

Count Financial Limited

Financial Services Guide

ABN 19001 974 625 | AFSL NO 227232

Version number 17.00

The purpose of this Financial Services Guide

This Financial Services Guide (FSG) is for Count Financial Limited ABN 19 001 974 625 ('Count') and is an important document designed to provide you with information to make an informed decision about the advice and services that Count provides.

Count ('we', 'us' or 'our') provides financial services through its Australian Financial Services Licence (AFSL No. 227232).

Your Count Financial Adviser ('Adviser') provides financial planning services to you as an Authorised Representative of Count. Your Adviser acts on behalf of Count which means that we are responsible for the services outlined in this FSG.

Your Adviser will operate under one of Count's franchisees. Our franchises nominate the Advisers that Count appoints as Authorised Representatives for the purpose of providing financial advice.

This FSG is divided into two parts and both parts must be read in conjunction as together they form the full FSG. Part One of this FSG provides high level disclosure of the financial services and products provided by our Group whereas Part Two of this FSG more specifically outlines the financial services and products provided by your Adviser, as well as more detail about the franchise for which they work.

Contacting us

If you need to contact us, you can speak with your Adviser or we can be reached using the following details:

Writing:	Count Financial Limited GPO Box 3323 Sydney NSW 2000
Phone:	1300 650 432

Part One

Part One of this FSG provides information about:

- Count and who we are
- Our relationships or associations with other entities
- Other disclosure documents you may receive
- The financial services and types of products we provide
- Collecting your personal information and providing us with instructions
- Fees or costs that may apply to you
- Remuneration that we, your Adviser or a related entity may receive, and
- What you can do if you are not happy with our services.

1. About Count Financial Limited

At Count our purpose is to help Australians afford their dreams. Our Advisers educate clients and help them make informed decisions about their future. So whether you are just starting out or approaching retirement, our Advisers assist you by providing you with a financial plan which gives you greater control over your financial future.

Our relationship with the Commonwealth Bank Group

We are a wholly owned, but non-guaranteed subsidiary of the Commonwealth Bank of Australia, one of Australia's largest financial services organisations.

We have associations with and may deal or provide advice on products issued by a range of financial product providers or services issued by a range of entities, some of which include the following entities within the Commonwealth Bank Group:

Avanteos Investments Limited
Australian Investment Exchange Ltd (AUSIEX)
BankWest, a division of Commonwealth Bank of Australia
The Colonial Mutual Life Assurance Society Limited (CMLA trading as CommInsure)
Colonial First State Investments Limited
Commonwealth Bank of Australia (CBA)
Commonwealth Securities Limited (CommSec)
Finconnect (Australia) Pty Ltd Australian Credit Licence No. 385888
Realindex Investments Pty Limited

Count has a significant shareholding in Countplus Limited ABN 11 126 990 832 (Countplus). Countplus owns 100% of Pacific East Coast Pty Ltd ABN 87 003 135 617.

Class Super is Count's preferred third party service provider of software to assist in the administration of Self-Managed Super Funds. In situations where you purchase this software Count receives 17.5% of the annual software licence fee.

We are a Professional Partner of the Financial Planning Association of Australia (FPA). The FPA is the professional association for qualified financial advisers in Australia and we are committed to its Code of Ethics and Code of Professional Conduct.

2. Disclosure documents

You may receive the following documents when your Adviser provides financial services to you.

Statement of Advice (SoA)

If your Adviser provides personal advice tailored to your circumstances and needs you will receive a SoA. The information contained in the SoA will help you make an informed decision in relation to the advice provided. It also sets out the advice, the reasons for the advice and details about any remuneration payable.

Record of Advice (RoA)

If you were previously issued with a Count SoA, certain circumstances may allow the provision of further advice without the need for another SoA. Where this is the case, you are entitled to request a RoA within seven (7) years after the advice was provided. The RoA can be requested from your Adviser and will detail the further advice and the basis of those recommendations.

Additionally, in certain circumstances where you are provided advice on a small investment balance or strategy advice only, you may be issued with a RoA. Your Adviser is required to provide you with a copy of the RoA in this circumstance, which will outline the advice, the reason for the advice, and details about any remuneration payable.

Product Disclosure Document (PDS)

You will receive a PDS if your Adviser recommends a financial product or offers to arrange the issue of a financial product on your request. The PDS contains information about a financial product's features, fees, benefits and risks.

3. Advice services and products we offer

Having access to a comprehensive range of products and services helps ensure your Adviser can provide a tailored financial solution just for you.

Advice services we provide

Our licence can provide advice in the following areas:

- Basic deposit products
- Life insurance
- Government debentures, stocks and bonds
- Managed investment schemes
- Securities
- Superannuation, and
- Standard margin lending.

Count is registered with the Tax Practitioners Board as a Registered Tax (Financial) Adviser. Based on the information collected from you, your Count Adviser will consider the tax consequences that relate directly to the financial advice being provided. However this financial advice will not include an assessment of your overall tax position. To determine how your Count Adviser's financial advice fits with your overall tax position, you should seek separate tax advice about liabilities, obligations or claim entitlements that arise, or could arise, under a taxation law.

Financial product types we recommend

Based on the advice services we are authorised in, examples of the types of products that we are able to provide advice on include:

- Savings accounts and term deposits
- Insurance (life cover, total and permanent disability cover, trauma cover, income protection and business overheads insurance)

- Treasury bonds and notes
- Managed funds and pooled investments
- Listed shares and exchange-traded funds
- Retail superannuation funds, Self-Managed Superannuation Funds and Retirement Savings Accounts, and
- Margin loans.

Approved products

Our specialist product research team undertakes due diligence on product providers and also use independent research providers to select a range of high quality products worthy of recommendation to our clients.

While other products may also be suitable to your needs, your Adviser will generally only provide advice on products that are listed on the Count Approved Product List ('Count APL').

The Count APL contains both Commonwealth Bank Group products and financial products issued by other providers external to the Group. All products must meet our rigorous selection criteria and approval process to be listed on the Count APL.

Depending on your objectives, financial situation and needs, your Adviser may need to recommend a financial product that is not on the Count APL. If this happens, any product that your Adviser may recommend needs to meet our selection criteria and approval process. The specific financial services and types of products that your Adviser is authorised to provide are outlined in Part Two of this FSG.

In some instances, your Adviser may seek portfolio research advice from CommSec Adviser Services and incorporate this research into the advice that they provide to you. The cost of this advice will be incorporated into the total advice fee and detailed in your SoA.

Services we are not responsible for

We are only responsible for those financial services or products offered by your Adviser in their capacity as an Authorised Representative of Count. This does not include any other services your Adviser may provide in any other capacity, including as an accountant or tax agent, such as:

- Taxation advice and services, eg completing tax returns
- Accounting and audit services
- Self-Managed Super Fund compliance and administration services
- Business or legal advisory services and referrals
- Advice on unlisted or private companies and investments, private development funds, franchises, high yield debentures, direct property, property syndicates, solicitor's or other mortgage schemes, derivatives, general insurance or direct international share holdings, and
- Any other services not provided as a franchisee of Count.

In all your dealings with your Adviser you must satisfy yourself as to who is responsible for the advice or services provided to you. If you require further clarification, please do not hesitate to contact Count.

4. Your personal information and providing us with instructions

How we handle your personal information

Count and your Adviser are committed to ensuring the privacy and security of your personal information. As part of our continuing commitment to client service and maintenance of client confidentiality we have adopted the principles set out in the Privacy Act 1988. For further details you can refer to the

Commonwealth Bank Group's Privacy Policy which is available from the security centre page at <https://www.commbank.com.au/security-privacy/general-security/privacy.html>

We may share your information with other members of the Commonwealth Bank Group. We may also share your information with others for reasons mentioned in Section 4 of the Group's Privacy Policy. Please refer to Sections 4 and 5 of the Group's Privacy Policy for more information around why your information may be shared and who we may share it with.

If you wish to review your personal information held by Count, please contact us by phoning 1800 026 868 or emailing privacy@count.com.au

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as your passport or driver's licence. We will also retain copies of this information. We assure you that this information will be held securely. We cannot provide you with services if you are unwilling to provide this information.

Instructing your Adviser

You will generally need to instruct your Adviser in person and your signature will be required for verification. For some products and services though, special arrangements can be put in place to instruct your Adviser by electronic means, for example phone, e-mail or fax.

Non-advisory transactions

At times you may wish to make an investment transaction and do not need assistance from us with any decisions in relation to the product or transaction. In these cases, we can take your instructions and arrange for the transaction to be completed, without providing personal advice. If you wish to proceed without advice from us we will ask you to confirm your instructions in writing and sign an acknowledgment form. Any assistance we provide to complete your transaction should not be taken as a recommendation or endorsement of the product or transaction.

5. Our fees and other costs

Financial planning advice fees

The fees or other costs that your Adviser may charge for services provided or products recommended, depends on the nature and complexity of your situation and the advice that is provided.

Your Adviser will agree with you the form and amount of charges before they provide any advice or services. The general way you pay for our services is through our financial planning advice fees or commissions.

The methods are explained below and the actual costs will be disclosed in your Adviser's written advice to you or in the acknowledgment form completed when a transaction is requested. You have the right to request further information in relation to the remuneration, the range of amounts or rates of remuneration that we or your Adviser may receive.

The fees and charges for our advice and service may be based on a dollar amount, a percentage of the amount invested, an hourly rate, or any combination of these.

Where we are aware that you have used borrowed funds to invest through us, we will charge you a flat dollar advice fee.

Our financial planning advice fees generally include charges for providing you with a SoA, ongoing advice and services, or it can be for other fees, such as a fee for a transaction. You may choose to pay these fees directly or from the product(s).

Please refer to Part Two of this FSG for further details on fees that your Adviser charges.

Commission payments

When you invest in a product or commence an insurance policy through us, we may receive initial or ongoing commission payments from product providers.

An initial commission is a one-off payment made upon entry to a financial product and an ongoing commission is paid each year for which a financial product is maintained.

These commissions are based on a percentage of the funds you invest, or the premiums you pay. They are not paid directly by you and are instead deducted from the investment, superannuation, loan or insurance premium by the product provider. We only receive commission where we are entitled to receive these payments through existing arrangements with product providers.

If you are charged a direct fee, your Adviser may rebate some or all of the above commission to you.

Investment, superannuation and loan products

The initial commission we receive on an investment, superannuation or loan product may be up to 4.40% of the investment amount. The ongoing commission we receive may be up to 1.50% per annum.

We will only receive commission payments on investments, superannuation or loan products, or additional contributions or drawdowns to these products, where we are entitled to.

Life insurance products

Additional cover added to an existing product which was issued before 1 January 2018

The initial commission we receive on insurance products may be up to 123.75% of the first year's premium. The ongoing commission we receive may be up to 33% per annum of the renewal premium.

New products issued on or after 1 January 2018

The initial commission that Count Financial may receive on insurance products applied for and issued on or after 1 January 2018 will be no more than 80% of the premium in the year of issue. The ongoing commission that Count Financial can receive will not exceed 20% per annum of the premium (33% per annum of the premium for level commission structures).

Referral fees

If you have been referred to your Adviser by a third party they may pay that referrer a fee. The franchisee and/or your Adviser may also receive a benefit for referring you to third parties for specialist services.

If applicable, further details will be disclosed in Part Two of this FSG at 'Referral Arrangements' and in your SoA.

6. Benefits we may receive

Product Provider Payments

We receive payments from product providers on a monthly or quarterly basis each year. For investment products these payments are based on the average balance of funds placed by all Count Advisers in each relevant product provider's investment option(s). We will continue to receive payments where we have an entitlement to do so under an agreement with a product providers prior to 1 July 2013.

For insurance products these payments are based on the value of insurance placed by all Count Advisers either on the relevant product providers platform or in insurance products offered by the provider. The payments received are based on a number of factors including the date that the policy was issued (only policies issued before 31 December 2017 are eligible to be included) and the level of policy lapses/cancellation.

Incentive payments

Fee rebate or waiver

The franchisee and/or your Adviser may also receive fee waivers, fee subsidies and/or fee reimbursements. These fees are for the provision of support services provided by Count to the franchisee and include such items as annual membership fees, software and data service fees, Paraplanning fees and the travel and accommodation costs associated for attending conferences and training events.

Other benefits we may receive

Alternative remuneration

From time to time, Count and your Adviser may also receive other benefits from product providers. If other benefits are received, they can only be valued at less than \$300 per provider each year or will otherwise be declined.

Count and your Adviser maintain a public register of all other benefits we receive, regardless of whether they are accepted or declined. We also maintain a conflicts of interest register.

Conflicts of interests are circumstances where some or all your interests are inconsistent with, or diverge from, some or all of our interests or those of your Adviser. If you would like to see a copy of these registers, you can speak with your Adviser or contact us.

A Licensee Advice Fee is charged by the Licensee, Count Financial Limited, on some products. It is a payment for services related to the provision of advice. These include (among others):

- Access to and research of product and platform offerings;
- Technical and strategy advice;
- Technology and process support; and
- Professional and technical development.

Professional Development Conference Sponsorship

We may also receive sponsorship payments from product providers which are in no way linked to volume of sales. These sponsorship arrangements help us to offset the organisational and running costs of providing education and training services for our Advisers.

Safeguards Adopted

We have adopted safeguards to manage conflicts of interest that may arise wholly or partially in relation to the activities that we undertake. These include

- providing full disclosure of the conflict of interest, potential conflict of interest, or perceived conflict of interest to you,
- referring you to another adviser within our Group to provide advice to you, and
- declining or withdrawing the services provided to you.

We believe these safeguards are a sound and effective means for controlling and avoiding conflicts of interest. Where we have identified a conflict of interest, we will act as a reasonable advice provider without a conflict would do, including providing advice that is in the client's best interests.

7. Complaints, privacy and compensation arrangements

We always strive to provide quality advice and service and welcome any feedback that allows us to continue to improve our services.

What to do if you have a complaint

Count is committed to resolving your concerns. If you are not fully satisfied with any part of the service or advice for whatever reason, you should take the following steps:

Step 1: Contact your Adviser

If you have a complaint or are not satisfied with the advice or services provided to you, you should contact your Adviser in the first instance and discuss your concerns with them. Most complaints can be resolved quickly and fairly at this stage.

Step 2: Complaints Manager

If your complaint has not been resolved to your satisfaction, you can contact the CBA Group Customer Relations team.

CBA Group Customer Relations is the Commonwealth Bank Group's primary escalation point for client feedback with a particular responsibility for resolving complaints. You can contact them by:

Writing:	CBA Group Customer Relations Reply Paid 41 Sydney NSW 2001
Emailing:	customerrelations@cba.com.au
Phone:	1800 805 605

Step 3: Financial Ombudsman Service (FOS)

If a satisfactory outcome is still not reached, you have the right to make a complaint, free of charge, to the Financial Ombudsman Service (FOS). You can contact the FOS by:

Writing:	Financial Ombudsman Service Limited GPO Box 3 Melbourne VIC 3001
Emailing:	info@fos.org.au
Phone:	1300 780 808
Fax:	(03) 9613 6399

Information about your rights can also be obtained from the Australian Securities and Investments Commission on 1300 300 630.

If your concerns involve unethical conduct, you may wish to consider raising these concerns with the Financial Planning Association of Australia (FPA). They can be contacted at PO Box 109 Collins St Melbourne VIC 8007.

Our compensation arrangements

We have professional indemnity insurance cover in place and these arrangements comply with the requirements for compensation under the Corporations Act.

Our professional indemnity insurance is subject to terms and exclusions and generally covers claims arising from the actions of our current and former employees or authorised representatives whilst they acted on our behalf.

Count Financial Limited
Head Office
Level 3E Commonwealth Bank Place
11 Harbour Street
Sydney NSW 2000
Phone: 1300 650 432

Date of preparation: 1 January 2018



Apiary Financial Planning Pty Ltd

Financial Services Guide

ABN 18 010 821 360 | Authorised Representative No: 326572

Version number 17.01

PART TWO – FINANCIAL ADVISER PROFILE

This adviser profile is Part Two of the Count Financial Limited Financial Services Guide (FSG) and should be read in conjunction with Part One. Together these documents form the Count Financial Limited FSG.

Apiary Financial Planning Pty Ltd is an Authorised Representative of Count Financial Limited (Count).

The individuals listed in this FSG are authorised by Count to provide advice through Apiary Financial Planning Pty Ltd.

Our Contact Details:

Address: Level 2, 16 McDougall Street, Milton Qld 4064

Phone: (07) 3217 2477

Fax: (07) 3217 2533

Email: info@apiaryfinancial.com.au

Web: www.apiaryfinancial.com.au

Scott McDonald



Authorised Representative Number: 326573

Scott is an Authorised Representative of Count and a director of Apiary Financial Planning Pty Ltd and receives a share of the profits received within this company.

Scott is a Chartered Accountant and holds a Bachelor of Economics from Monash University, Melbourne, obtained in 1985. He is a registered tax agent, a registered company auditor, a Chartered Tax Adviser, a Fellow of The Tax Institute and a registered SMSF auditor.

Scott has been in public practice for over 28 years and became a partner of the firm in January 2003. Scott has 10 years' experience in the provision of financial planning advice. Prior to joining Apiary Financial Planning Pty Ltd, Scott was employed with an international accounting firm as a Director of Business Services where he obtained a broad range of experience in audit, business recovery, taxation and business services.

Financial services and product types

Scott McDonald is authorised to provide advice in the following areas:

- Deposit and payment products
- Life products
- Government debentures, stocks and bonds
- Managed investment schemes
- Retirement Savings Accounts
- Securities
- Superannuation, and
- Margin lending.

How to Contact me: s.mcdonald@apiaryfinancial.com.au or 07 3217 2477

Salvatore Russo



Authorised Representative Number: 326571

Salvatore is an Authorised Representative of Count and a director of Apiary Financial Planning Pty Ltd and receives a share of the profits received within this company.

Salvatore is a Chartered Accountant and holds a Bachelor of Commerce from the University of Queensland, obtained in 1995. He is a registered tax agent, a Chartered Tax Adviser, a Fellow of The Tax Institute and a registered SMSF auditor.

Salvatore has been in public practice with Apiary Financial since 1995 and became a partner of the firm in July 2005. Salvatore has 10 years' experience in the provision of financial planning advice. Salvatore has a broad range of experience in business services and taxation.

Financial services and product types

Salvatore is authorised to provide advice in the following areas:

- Deposit and payment products
- Life products
- Government debentures, stocks and bonds
- Managed investment schemes
- Retirement Savings Accounts
- Securities
- Superannuation, and
- Margin lending.

How to Contact me: s.russo@apiaryfinancial.com.au or 07 3217 2477

Suzanne Grayling



Authorised Representative Number: 298971

Suzanne is an Authorised Representative of Count and an employee of Apiary Financial Planning Pty Ltd and receives a salary only.

Suzanne has over 14 years of experience in the provision of financial planning advice. Suzanne attained a Diploma of Financial Planning from the Financial Planning Association and Deakin University in 2003 and is a CERTIFIED FINANCIAL PLANNER® Professional. Suzanne has been a member of the Financial Planning Association since 1999.

Financial services and product types

Suzanne is authorised to provide advice in the following areas:

- Deposit and payment products
- Life products
- Government debentures, stocks and bonds
- Managed investment schemes
- Retirement Savings Accounts
- Securities
- Superannuation, and
- Margin lending.

How to Contact me: s.grayling@apiaryfinancial.com.au or 07 3217 2477

Craig Dobbs



Authorised Representative Number: 1257695

Craig is an Authorised Representative of Count and a director of Apiary Financial Planning Pty Ltd and receives a share of the profits received within this company.

Craig is a member of the Institute of Chartered Accountants in Australia and New Zealand and holds a Bachelor of Commerce from the University of Queensland. He is a Chartered Tax Advisor, a Member of the Tax Institute and holds a Graduate Diploma in Chartered Accounting and a Diploma of Financial Planning.

Craig joined the Apiary Financial team in 2008, and became a partner of the firm in July 2015. Craig has been authorised to provide financial planning advice since 23rd August 2017. Craig offers experience in the areas of business advisory services and taxation.

Financial services and product types

Craig is authorised to provide advice in the following areas:

- Deposit and payment products
- Life products
- Government debentures, stocks and bonds
- Managed investment schemes
- Retirement Savings Accounts
- Securities and;
- Superannuation

How to Contact me: c.dobbs@apiaryfinancial.com.au or 07 3217 2477

Advice Preparation and implementation fee

Prior to the provision of personal advice we will agree upon a preferred payment option for both parties. Below is a summary of our available payment options that can be combined to pay for our services.

Where we are aware that you have used borrowed funds (i.e. funds that are either secured or unsecured) to invest through us, we will charge you a flat dollar fee.

These payment options include:

Time Based Charging

- i) The fee for the preparation and implementation of our advice is calculated based upon the time we spend developing the plan. Our hourly rate is \$400 per hour (incl. GST) with our advice preparation fee ranging from \$4,000 to a maximum of \$20,000 (incl. GST).

Price can vary depending on scope and complexity and we will provide you with an estimate of the overall cost. If extra charges apply, then we will inform you before proceeding with any work.

Service Based Charging

- ii) The fee for the preparation and implementation of our advice is calculated based upon a fixed price agreement. This fixed dollar amount will vary based upon the complexity of advice being provided and agreed upon prior to commencement. Our minimum fee for this is \$4,000 (incl. GST) up to a maximum of \$20,000 (incl. GST).

Asset Based Charging

- iii) The fee for the preparation and implementation of our advice is calculated as a percentage of the dollar amount invested. Our minimum fee for this is \$2,200 (incl. GST) and the maximum fee is calculated based upon fee schedule 1 below.

Schedule 1 (investments)

Maximum initial fee*	Investment amount	Average portfolio charge
4.40%	first \$50,000	\$2,200 on \$50,000
2.75%	\$50,001 - \$100,000	\$3,575 on \$100,000
2.20%	\$100,001 - \$200,000	\$5,775 on \$200,000
1.65%	\$200,001 - \$300,000	\$7,425 on \$300,000
1.10%	\$300,001 - \$1,000,000	\$15,125 on \$1 million
0.55%	over \$1,000,001	Up to a maximum of \$20,000

* Fees on tax effective products are capped at 4.4% with any excess refunded back to you.

Life Insurance

- i) The fee for the preparation and implementation of our advice is calculated as a percentage of the premium amount paid. Our minimum fee for this is \$4,000 (incl. GST), based on 10 hours at our hourly rate of \$400 per hour and the maximum fee is calculated based upon fee schedule 2 below.

Schedule 2 (Retail insurance)

Additional cover added to an existing product that was issued before 1 January 2018
The initial commission that we may receive can be up to 124% of the first year's premium. The ongoing commission that we can receive may be up to 33% per annum of the renewal premium.
New products issued on or after 1 January 2018
The initial commission that we may receive on insurance products applied for and issued on or after 1 January 2018 will be no more than 80% of the premium in the year of issue. The ongoing commission that we can receive will not exceed 20% per annum of the premium (33% per annum of the premium for level commission structures).

Schedule 3 (Group insurance)

The fee is calculated based on an hourly rate of \$400 per hour (incl. GST). Our minimum for this is \$4,000 (incl. GST) and the maximum fee is \$20,000 (incl. GST).

The ongoing fee for advice in relation to Group Insurance products is subject to a maximum fee of 30% of premium p.a.

If you decide not to implement our recommendations, the fee for the preparation of the Statement of Advice will be payable in full.

Supplementary service fees

For supplementary services, such as the provision of general research material or the completion of administrative tasks, our fee will be calculated on a time basis of \$400 per hour.

Ongoing service fees

Our ongoing advice fees vary depending on scope and complexity and range from \$400 to 1.50% per annum of your total portfolio balance (incl. GST) unless otherwise agreed. The exact cost of the ongoing review service will depend on the review offering we recommend and this will be disclosed within the Ongoing Service Agreement we provide to you.

Portfolio Value	Maximum Review Fee	Amount adviser is entitled to (\$)
\$500,000	1.50%	\$7,500

Should you require any additional services outside of any agreement between you and your adviser, an amount of up to \$400 per hour (incl. GST) may be applied.

With respect to platforms, as Licensee, Count may receive an ongoing fee which may be tiered based on the value of our portfolio of up to 0.6% p.a

Non-advisory implementation fees

Managed investments and bank accounts: A fee of \$150 per investment transaction (excluding any non-rebateable component of fund manager fees) will be applied, plus any applicable ongoing commission paid by the product provider.

Share transactions: A fee of 1.5% (includes both adviser and broker charges) of the amount to be invested will be applied, subject to a minimum of \$150.

Wealth Protection: A fee detailed in Schedule 2 (Retail Insurance) in the Advice Preparation and Implementation Fee – Insurance section above applies for this service.

Other: If we assist you on an execution only basis (i.e. where you have been offered and declined advice), a fee of up to \$1,400 (incl. GST) may be applied.

Referral arrangements

We have a referral arrangement in place with the providers detailed below. If you use the services of these providers we will receive the corresponding fee disclosed in the below table for the referral of your business. This will be paid for by the relevant provider and is not an additional cost to you.

Referral Arrangement	Description of Referrer	Payment Made to Adviser
TFSA	TFSA (AFSL No 224954) provides wealth protection solutions to clients. It is wholly owned subsidiary of Countplus Limited, a publicly listed company on the ASX. Count Financial Limited currently holds a 36% stake in Countplus Limited.	Apiary Financial Planning Pty Ltd receives 25% and Count Financial Limited 12.5% of any upfront commission paid by the Insurance Provider.
Finconnect	Finconnect provides lending and financing solutions to clients. These services will either be provided by a Finconnect lending manager or a loan writer at another Count Firm.	Apiary Financial Planning Pty Ltd receives 30% of any upfront commission paid by the Loan Provider. Apiary Financial Planning Pty Ltd receives 40% of any ongoing commission paid by the Loan Provider.
Pacific East Coast Property	Pacific East Coast Property is one of Australia's leading sources of property investments. They can assist clients that may be interested in investing in direct property.	A referral fee of 2% (plus GST) of the purchase price is paid to Apiary Financial Planning Pty Ltd. This is paid in two instalments 50% on exchange of Contract and the remainder at settlement. In addition 1% of the purchase price is paid to Count Financial Limited, and will contribute to our firm's annual revenue contribution to Count. These fees are paid by Pacific Eastcoast and are not an additional cost to you.

I may refer you to a third party for advice or services. Should this occur, you are not obliged to consult the professional person I have suggested, but where you do I may receive a referral fee or other benefit from the business transacted on your behalf.

Other Associations and Relationships

Scott McDonald, Salvatore Russo and Craig Dobbs are directors and shareholders of Apiary Financial Planning Pty Ltd and Partners of Apiary Financial which are separate entities. Referrals may pass between these two entities. Whilst there is no direct payment received by either party, there may be a potential financial benefit received by the owners of either business as a result of fees charged for services provided to the referred party.

Other costs

All fees and commissions will be disclosed in your Statement of Advice. Count may also charge transaction fees in respect of particular products. These include the following.

- Where trades are executed using our approved stockbrokers, Count charges a Transaction Fee in addition to the brokerage charged by the broker. This fee ranges from \$25 to \$29.

- For listed securities held off platform \$110 p.a. for non-advised portfolios and up to 0.22% p.a. for advised portfolios.

In addition to the commissions outlined above, we may also receive the following fees and/or commissions in respect to particular products.

Schedule 4 (Margin Lending)

We receive an ongoing commission in relation to margin loan facilities and it is calculated at 0.55% of your loan balance.

Schedule 5 (Term Deposits and Cash)

We receive an ongoing commission of up to 0.44% of your account balance.

Schedule 6 (Protected Equity Investments)

We receive an upfront commission of up to 1.375% and ongoing commission of 0.55% of your investment amount.

Schedule 7 (Intra-Fund Advice)

Count may receive payments from the trustee of a superannuation fund with which it has entered into an intra-fund services agreement. These payments will generally be up to \$80 pa per member and are paid periodically to Count. Count may pass a portion of this payment on to me.

Other benefits - contributions to Count (CTCs)

CTCs are a points-based rewards system primarily calculated on revenue contributed to Count. For investments placed by Apiary Financial Planning Pty Ltd (a franchisee of Count) in approved administration platforms and retail products, CTCs are calculated based on your total balance and are allocated annually.

The following table shows the level of CTCs allocated in relation to Count's approved administration platforms and retail products, calculated per \$100,000 invested.

\$100,000 invested in the following platform	CTC Value	\$100,000 invested in the following platform	CTC Value
IOOF IPS, platform ² and wealth-e-account	250	Perpetual WealthFocus*	250
IOOF Pursuit	250	Colonial First State FirstChoice*	250
Star Portfolio	250	Colonial First State FirstChoice Wholesale	250
wealth-e-account Wrap Essentials*	250	Praemium Customised Portfolio	250
BT Panorama	250	Insurance via wealth e-account and platform ²	70**

[^] For insurance this is a reference to \$100,000 of insurance premiums.

* Closed to new business.

** Points will only be allocated on policies issued before 31 December 2017.

CTC points may also be earned on the following (allocations of points for each activity differ): advice fees and commissions, lending commissions, listed securities fees, leasing/asset finance revenue, conference fees, authorised representative fees, adviser planning and administration tool costs and the Count membership fee.

With respect to advice fees and ongoing commissions paid from Retail Investments and insurance, Apiary Financial Planning Pty Ltd will receive one CTC for each \$1 paid to Count. The amount will be set out in the advice document provided to you.

Each year Count sets a CTC target for our firm. If we exceed this target, we are entitled to a cash payment equivalent to 5% of our CTC total (plus GST). As a worked dollar example, if we were to assume that our firm accumulates 100,000 CTCs over the year, Count will pay us $100,000 \times 5\%$ (plus GST) = \$5,500 (GST inclusive).

If we achieve at least 102,000 CTC's then we will be entitled to a rebate of our membership fee to Count for the following financial year.

We may also qualify for scale based rebates, i.e. once we have exceeded 204,000 CTCs we may qualify for cash payments starting from \$10,000 including GST.

Count Financial Limited

Supplementary Financial Services Guide

ABN 19001 974 625 | AFSL NO 227232

This Supplementary Financial Services Guide (SFSG), version 2.0 dated 1 May 2019, is to be read in conjunction with the FSG Count Financial Services Guide Part 1 Version 17 dated 1 January 2018 and the corresponding Part 2 given to you at the same time as Part 1 (FSG).

The FSG and SFSG have been authorised for distribution by the authorising Licensee:

Count Financial Limited ABN 19 001 974 625

Australian Financial Services Licence No. 227232

11 Harbour Street Sydney NSW 2000

Date of Preparation: 1 May 2019

Version Number: 2.0

In section 1 titled 'About Count Financial Limited' in Part 1 of the FSG, replace the content under subtitle 'Our relationship with the Commonwealth Bank Group' with the following:

Our relationship with the Commonwealth Bank Group

We are a wholly owned, but non-guaranteed subsidiary of the Commonwealth Bank of Australia, one of Australia's largest financial services organisations.

We have associations with and may deal or provide advice on products issued by a range of financial product providers or services issued by a range of entities, some of which include the following entities within the Commonwealth Bank Group:

Avanteos Investments Limited
Australian Investment Exchange Ltd (AUSIEX)
BankWest, a division of Commonwealth Bank of Australia
The Colonial Mutual Life Assurance Society Limited (CMLA trading as CommInsure)
Colonial First State Investments Limited
Commonwealth Bank of Australia (CBA)
Commonwealth Securities Limited (CommSec)
Finconnect (Australia) Pty Ltd Australian Credit Licence No. 385888
Realindex Investments Pty Limited

Note: The Commonwealth Bank of Australia (CBA) has announced the sale of CMLA, among other entities, to the AIA Group. CBA, CMLA and AIA Australia Limited have also agreed to enter into a 20-year Distribution Agreement for the provision of life insurance products to customers in Australia. From the date of completion, CMLA will form part of the AIA Group and will no longer be part of the CBA Group. The sale is targeted to complete in the first half of calendar year 2019 but is subject to a number of conditions and regulatory approvals. Please ask me for information on whether the sale has completed to confirm details of the Licensee's current associated entities.

Any reference to 'Commonwealth Bank Group product' in this FSG relates to products issued by the CBA or its subsidiaries.

Count has a significant shareholding in Countplus Limited ABN 11 126 990 832 (Countplus).

We are a Professional Partner of the Financial Planning Association of Australia (FPA). The FPA is the professional association for qualified financial advisers in Australia and we are committed to its Code of Ethics and Code of Professional Conduct.

In section 3 titled 'Advice services and products we offer' in Part 1 of the FSG, add the following as the last paragraph:

Important information

The advice that you receive cannot be considered to be independent, impartial or unbiased because:

- Count is part of a corporate group that includes certain product providers, as described in section 1 of the FSG;
- there is an approved product list (APL) and an off-APL approval process that your Adviser is required to follow, as explained in section 3 of the FSG; and
- Your Adviser, the firm or Count may receive (as referred to in section 5 and 6 of the FSG):
 - commissions on life insurance;
 - commissions on some other products acquired prior to 1 July 2014;
 - stamping fees paid to facilitate a capital raising;
 - remuneration calculated on the basis of the volume of business placed with product providers; and
 - one-off gifts or non-monetary benefits of less than \$300 in value per product provider per year.

In section 3 titled ‘Approved products’ in Part 1 of the FSG, remove the following paragraph:

In some instances, your Adviser may seek portfolio research advice from CommSec Adviser Services and incorporate this research into the advice that they provide to you. The cost of this advice will be incorporated into the total advice fee and detailed in your SoA.

In section 4 titled ‘Your personal information and providing us with instructions’ in Part 1 of the FSG, add the following sentence at the end of the second paragraph under the subtitle ‘How we handle your personal information’ with the following:

We may also disclose your information with overseas paraplanning service providers located in Serbia.

In section 5 titled ‘Our fees and other costs’ in Part 1 of the FSG, replace the content under subtitle ‘Life insurance products’ with the following:

Life insurance products

Additional cover added to an existing product which was issued before 1 January 2018

The initial commission we receive on insurance products may be up to 124% of the first year’s premium. The ongoing commission we receive may be up to 33% per annum of the renewal premium.

Additional cover added to an existing product which was issued after 1 January 2018

Where additional cover is added on or after 1 January 2019 and before 1 January 2020, to an existing product issued after 1 January 2018, the initial commission that Count Financial will receive will be no more than 77% of the increase in premium. The ongoing commission that Count Financial can receive will not exceed 22% per annum of the premium.

New products issued on or after 1 January 2019 and before 1 January 2020

The initial commission that Count Financial may receive on insurance products applied for and issued on or after 1 January 2019 and before 1 January 2020 will be no more than 77% of the premium in the year of issue. The ongoing commission that Count Financial can receive will not exceed 22% per annum of the premium (33% per annum of the premium for level commission structures).

In section 5 titled ‘Our fees and other costs’ in Part 1 of the FSG, replace the content under subtitled ‘Referral fees’ with the following:

If you have been referred to your Adviser by a third party they may pay that referrer a fee. The franchisee and/or your Adviser may also receive a benefit for referring you to third parties for specialist services.

- Class Super is Count’s preferred third party service provider of software to assist in the administration of Self-Managed Super Funds. In situations where you purchase this software Count receives 17.5% of the annual software licence fee.
- SUPERCentral is Count’s preferred third party service provider for preparing trust deeds. In situations where you utilise their services Count receives between 25% and 46% of revenues that SUPERCentral receives as a result of the referral.
- Australian Executor Trustees is a third party service provider for trustee services which Count has a referral arrangement with. In situations where you utilise their services as a result of the referral, Count receives 10% of any amounts that are billed to you.
- Count also has a referral arrangement in place with Townsends Business and Corporate Lawyers (Townsends). If you use the services of this provider as a result of a referral from us, Count Financial Limited will receive up to 10% of the invoice payable by you to Townsends.

If applicable, further details will be disclosed in Part Two of this FSG at ‘Referral Arrangements’ and in your SoA.

In section 6 titled ‘Benefits we may receive’ in Part 1 of the FSG, remove the following paragraph under the subtitle ‘Alternative remuneration’:

A Licensee Advice Fee is charged by the Licensee, Count Financial Limited, on some products. It is a payment for services related to the provision of advice. These include (among others):

- Access to and research of product and platform offerings;
- Technical and strategy advice;
- Technology and process support; and
- Professional and technical development.

In section 6 titled ‘Benefits we may receive’ in Part 1 of the FSG, add the following paragraph under the subtitle ‘Alternative remuneration’:

For Morningstar managed portfolios, a fee equivalent to 0.2% per annum of your portfolio value is charged by Count Financial Limited for the ongoing review of the managed portfolios, and oversight of the investment policy and investment program with respect to the managed portfolio investment options.

In section 7 titled ‘Complaints, privacy and compensation arrangements’ in Part 1 of the FSG, replace the content under subtitle ‘Step 3: Financial Ombudsman Service (FOS)’ with the following:

Step 3: Australian Financial Complaints Authority (AFCA)

If you’re not satisfied with our handling of your complaint or our decision, you may refer your complaint to the Australian Financial Complaints Authority (AFCA). AFCA offers a free independent dispute resolution service for consumer and small business complaints.

Writing:	Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
Online:	www.afca.org.au
Phone:	1800 931 678 (free call)
Email:	info@afca.org.au

Information about your rights can also be obtained from the Australian Securities and Investments Commission on 1300 300 630.

If your concerns involve unethical conduct, you may wish to consider raising these concerns with the Financial Planning Association of Australia (FPA). They can be contacted at GPO Box 4285 Sydney NSW 2001.

In section titled ‘Advice preparation and implementation fee’ in Part 2 of the FSG, replace the content under subtitle ‘Life Insurance – Schedule 2 (Retail insurance)’ with the following:

Life Insurance – Schedule 2 (Retail insurance)

The maximum fees are based on the commission payments detailed in the section titled ‘Our fees and other costs’ in Part 1 of the FSG under ‘Life Insurance Products’.

**Count Financial Limited
Head Office
11 Harbour Street
Sydney NSW 2000
Phone: 1300 650 432**

Date of preparation: 1 May 2019

