Authorised Representative Profile

This document is part of a Financial Services Guide and should be read in conjunction with Part 1 (A Guide to Our Relationship with You and Others) version 18 dated 1 January 2020.

Dulwich Group Financial Services Pty Ltd is a Corporate Authorised Representative of Paragem Pty Ltd (ASIC Authorised Representative number 1240611) and is partially owned by your Adviser, John Grocke. John is also authorised by Paragem and his ASIC Authorised Representative number is 245970. Dulwich Group Financial Services trades as Johnston Grocke.

John was the founding financial planning Principal of Johnston Grocke in 1990. John’s expertise has developed over this time using strategies to assist people in achieving financial goals. He provides holistic personal financial planning with special attention to Superannuation, Wealth Accumulation and Retirement Planning.

John is a Certified Financial Planner® (CFP®) and a member of the Financial Planning Association. In addition, John holds an appointed position as a Trustee of a National Superannuation Scheme with about 7,000 members.

John provides proactive, responsive client service on an ongoing basis to bring comfort and peace of mind to his clients. He is assisted by a team of dedicated staff.

John is authorised by Paragem to advise and deal in the following financial products:

- Deposit products (cash and Term Deposits)
- Debentures, stock and bonds issued by a government
- Life Insurance risk products
- Life Insurance investment products
- Managed Investment Schemes (Unit Trusts)
- Securities (shares)
- Superannuation, including Self-Managed Superannuation Funds
- Retirement Savings Accounts
- Standard Margin Lending Facility
Remuneration

The following is a schedule of the fees that are payable for our services and/or the commissions we may receive from product issuers. Note that you may pay a fee for a service and we may also receive commissions as a result of you accepting our recommendations. The costs applicable to the services you require will be discussed with you by your adviser.

Paragem will pay Dulwich Group Financial Services Pty Ltd at least 91% of the fees and/or commissions detailed in this schedule and Paragem will retain the balance.

John Grocke is a Director of Johnston Grocke and is remunerated by way of annual salary and may receive distributions/dividends from this entity.

Fees

All fees charged will be advised to you prior to engaging our services. The following methods may apply:

- You may be charged a Statement of Advice preparation fee. This can range between $1,600 and $3,300 (inclusive of GST) depending on the complexity and the time spent.
- For any ongoing services, our fees will be charged by either a flat fee or an hourly rate of up to $330 per hour, inclusive of GST.
- For Certain products such as insurance, we may receive ongoing commissions, and on occasions may be received by us in lieu of a fee. For example, an ongoing service cost of $4,000 pa could be met with insurance commissions of $2,000 pa and a flat fee of $2,000 pa.

Any invoice must be paid within fourteen (14) days of the date of it being issued to you.

**Transaction Fees: Australian Shares:**

You will be charged a brokerage fee for each buy and sell transaction executed on your behalf.

Brokerage is a minimum of $19.95 plus GST, and a maximum of 0.11% plus GST

*For example, if your transaction value is $100,000 the brokerage will be from $19.95 + GST up to a maximum of $110 + GST.*

All equities trading must be settled within T + 2 (trading date plus two business days). If you fail to settle on a transaction additional fees may apply.

**Commissions**

**Investment products**

We can only receive commissions from investment products if we have an existing agreement with the product provider prior to 1st of July 2013.

The issuers of the investment products we recommend may pay an ongoing commission. This commission can vary depending on the product and manager but is generally in a range of between 0% and 1% of the balance in your account per annum. This commission is paid each quarter.

*For example, if your account balance was $11,000 and we charged 1% ongoing commission we would receive $110 per annum.*

**Insurance Products**

Commissions can be received for life insurance products with the exception of life insurance implemented after 1 July 2014 for a member in a default superannuation or a group life policy in a superannuation fund.

We receive a level commission rate from the insurers we use. The rate of commission can vary depending on the product and insurer and generally ranges from 10% to 30% of the annual premium initially and every year the policy is renewed.

For example if your premium is $500 and the insurer pays us 30% we will receive $150.
Potential Conflicts of Interest

Ownership
Paragem Pty Ltd, our licensee, is a wholly owned subsidiary of HUB²⁴ Limited, an ASX listed company that provides an investment administration and reporting platform. If you use the HUB²⁴ platform, Paragem’s employees and Authorised Representatives may benefit financially by virtue of being shareholders in the company. John Grocke is a shareholder of HUB²⁴.

We are obliged to always act in a client’s best interests and will only recommend the use of the HUB²⁴ platform if it is appropriate to do so. We also continue to use other platforms to implement our investment advice. If you would like additional information on how HUB²⁴ compares to other platforms or would like to use an alternative platform please let us know.

Additional Commissions
Dulwich Group Financial Services Pty Ltd may also receive additional commissions calculated on the aggregated amount of funds it has placed with a platform provider. The additional commission is calculated as a percentage of the administration fee after the deduction of all costs. Therefore the amount is already included in the fees the product provider deducts from your investment account or insurance premium. We are only able to receive these commissions where we had an existing arrangement with the platform provider prior to the 1st of July 2013.

To illustrate this point, as a result of the funds that Dulwich Group Financial Services Pty Ltd already has under administration with Asgard, the percentage of additional commission is up to 7.5% of the Administration Fee.

Privacy Statement

The privacy of your personal information is important to us.

1. Your representative will ask you many questions. Why is so much information required?
   We collect your personal information to enable us to provide you with the products and services that are appropriate to your needs. Under the following Australian laws we may be authorised or required to collect your personal information:
   - Corporations Act 2001,
   - Australian Securities and Investment Commissions Act 2001,
   - Anti Money Laundering and Counter Terrorism Financing Act,
   - Taxation Administration Act 1953,
   - Superannuation Guarantee (Administration) Act 1992, and
   - Superannuation (Unclaimed Money and lost members) Act 1999,
   as those acts are amended and any associated regulations. From time to time other acts may require or authorise us to collect your personal information.

   We are required to collect sufficient information to identify a person’s needs, objectives and financial circumstances so that we can provide appropriate financial advice.

   We will gather the information by asking you numerous questions about you and possibly your family. We will record this information. We endeavour to retain accurate, complete and up to date personal information about you so we will ask you to review the information from time to time.

   If the information you provide to us is incomplete or inaccurate this will impact on our analysis of your requirements and may result in advice that is not appropriate to your needs and circumstances. If this does occur you will need to make your own assessment concerning the appropriateness of our advice.

   At times, we may collect personal information from someone other than yourself and you may not be aware that we collect or have collected this information.

2. Access and correction
   You may (subject to permitted exceptions) access and update your information by contacting us. You may access the personal information we retain and request corrections. This right of access is subject
to some exceptions allowed by law. We will give you reasons if we deny access and will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependent to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

3. Providing personal information

We may provide personal information to:

- organisations (who are bound by strict confidentiality) to whom we outsource certain functions, such as our auditors (in these circumstances, information will only be used for our purposes);
- other professionals, such as solicitors, accountants, stockbrokers, as well as other advisers specialising in aged care, Centrelink or insurance when a referral is required;
- entities based overseas (see below for details);
- third parties when required to do so by law, e.g. legislation or Court Order.

4. Overseas disclosure

Sometimes we need to provide personal information to or get personal information about you from persons located overseas. For example we may outsource a function involved in the financial planning business to someone based overseas. Nevertheless, we will always disclose and collect your personal information in accordance with Privacy Principles.

5. Identifiers

Although in certain circumstances we are required to collect government identifies such as tax file numbers, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

6. Dealing with us anonymously or using a pseudonym

The nature of the provision of financial services does not lend itself to treating customers with anonymity. All transactions require personal information about the individual for whom the transaction is being completed.

In some instances we may be able to provide information or a service anonymously or to you under a pseudonym, for example, enquiries about products from a potential client.

You can deal with us anonymously where it is lawful and practicable to do so.

7. Marketing practices

Every now and then we might let you know about news, products and services that you might be interested in, via mail, email, SMS, telephone or online. We will engage in marketing unless you tell us otherwise. You can contact us at any time to update your marketing preferences.

8. Sensitive information

We will not collect sensitive information about you, for example where information is provided by you for insurance or risk purposes, without your consent. Exceptions to this include where the information is required by law or for the establishment, exercise or defence of a legal claim.

9. Privacy complaints

If you believe your privacy has been breached or you have a privacy complaint you should write to the Privacy Officer at Paragem, by email at info@paragem.com.au or at PO Box R1135, Royal Exchange NSW 1225.

If Paragem does not satisfactorily address your complaint you can escalate it to the Office of the Australian Information Commissioner: www.oaic.gov.au.

10. Our Privacy Policy

If you require more information please ask for a copy of our Privacy Policy or refer to Paragem’s website.