

### **Trilogy Group Australia Pty Ltd**

ABN 80 078 111 654 AFSL 218770  
Level 14 360 Collins Street Melbourne Vic 3000  
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www.trilogygroupaustralia.com.au

### **Atlantic Pacific Securities Pty Ltd**

*trading as ASR Wealth Advisers*  
ABN 72 135 187 085 appointed by  
Trilogy Group Australia Pty Ltd as Corporate  
Authorised Representative No 339207

## **FINANCIAL SERVICES GUIDE**

### **What is a Financial Services Guide?**

This Financial Services Guide (FSG) is issued to retail clients and assists you to understand and also to decide if you wish to use the financial services we may offer you.

It provides you with information about the entities that may provide you with financial services, including:

- Atlantic Pacific Securities Pty Ltd (APS) trading as ASR Wealth Advisers (ASR Wealth Advisers) which is a corporate authorised representative of Trilogy Group Australia Pty Ltd (Trilogy) being the authorising Licensee;
- individual authorised representatives of ASR Wealth Advisers; and
- representatives and authorised representatives of Trilogy.

In this FSG, we collectively refer to authorised representative(s) as 'us, our, we'. APS is referred to by its trading name, ASR Wealth Advisers. Trilogy and APS are each a providing entity for financial products and services offered under the Trilogy Australian Financial Services Licence.

This FSG sets out the services we provide and explains:

- who we are and how we can be contacted;
- who the licensee is and how it can be contacted;
- what services and products we are authorised to provide to you;
- how we (and any other relevant parties) are paid; and
- how we deal with complaints.

Please retain this FSG for your reference and any future dealings with us. We may also add supplementary documents at a later date which will also form part of this FSG, and these should be read together with the FSG. These documents will include the word 'Supplementary FSG' in the heading.

### **Purpose of this FSG**

This FSG provides information to you about your client rights and obligations under the Corporations Act 2001 and Regulations (Corporations Act) and about our services, charges, and obligations to our retail clients. This FSG contains information on investment risk, interests of ours which may conflict with yours, and remuneration/benefits payable to Trilogy and others if you use our services. Charges, commissions, or fees not listed in the body of this FSG are listed in a separate fees schedules which will be provided when you complete an account application and before you commence trading, and also on request, and available from [compliance@trilogygroupaustralia.com.au](mailto:compliance@trilogygroupaustralia.com.au).

This FSG also tells you what to do if you have a complaint and how we will handle it. It explains the protection of, and why we need and how we use, the Personal Information that you may provide to us, if our services are used.

It is our objective to provide you with clear, concise, and effective disclosure about our products and services which may assist you to determine whether to use any of our products and services. Should you choose to use any of our services and products, you may also receive other documents relevant to the services or products which you should also read carefully and ensure that you understand.

### **Warning**

Nothing contained in this FSG constitutes the giving of personal advice for a recommendation concerning an investment in a particular financial product. In preparing this FSG, Trilogy has not taken into account the investment objectives, financial situation or particular needs of any individual client. This FSG only contains factual information or general advice. Before making a decision whether to invest in a particular financial product you should speak to your financial service provider and obtain independent tax advice taking into account your own particular objectives and financial circumstances and needs.

## Amendments to this FSG

Trilogy may at its discretion and without any prior or subsequent notice to you, amend or remove any part of this FSG at any time to reflect changes in our practices and or applicable law and regulation.

The current FSG is available at [www.trilogygrouppaustralia.com.au](http://www.trilogygrouppaustralia.com.au)

If you need to refer to the FSG from time to time to ensure that you are aware of any changes or updates to the FSG, we recommend that you check the website or request a current version which will be indicated by a change in the version number and date noted in the footer of the document. If you do not have access to electronic communication or our website, you may request a copy of this FSG by contacting us.

## Who will be providing the financial services to you?

### The Licensee

The licensee discussed in this FSG is the authorising licensee for the financial services provided to you, and is responsible for those services.

The licensee authorises, and is also responsible for, the content and distribution of this FSG.

The authorising licensee will also appoint and be responsible for the corporate authorised representative and its sub-authorised representatives (these are the advisers who will provide general advice on securities to you and/or arrange execution of your trades).

### Licensee details

<b>Licensee name:</b>	<b>Trilogy Group Australia Pty Ltd</b>
<b>AFSL number:</b>	218770
<b>Address:</b>	Level 14 360 Collins Street Melbourne Vic 2000
<b>Website:</b>	<a href="http://www.trilogygrouppaustralia.com.au">www.trilogygrouppaustralia.com.au</a>
<b>Phone:</b>	+61 3 8686 3880 or 0414 810 535
<b>Email:</b>	<a href="mailto:compliance@trilogygrouppaustralia.com.au">compliance@trilogygrouppaustralia.com.au</a>

### The Authorised Representative

ASR Wealth Advisers is the providing entity and provides the financial services to you in its capacity as an authorised representative of the licensee.

### Authorised representative details

<b>Name:</b>	Atlantic Pacific Securities Pty Ltd CAR number 339207 <i>trading as ASR Wealth Advisers</i>
<b>Address:</b>	Level 13, 124-130 Pitt Street, Sydney
<b>Website:</b>	<a href="http://www.asrw.com.au">www.asrw.com.au</a>
<b>Phone:</b>	+61 2 8356 9356 (for dealing or settlement services)
<b>Email:</b>	<a href="mailto:clientservices@asrw.com.au">clientservices@asrw.com.au</a>

Atlantic Pacific Securities Pty Ltd trading as ASR Wealth Advisers is a related entity of the Amalgamated Australian Investment Group Limited ABN 81 140 208 288 ("AAIG") and its related entities.

You can provide instructions to us by the contact details above or by phone or email to your adviser.

The licensee may also authorise individual authorised representatives who may share the same office as ASR Wealth Advisers. The role of these individual authorised representatives, who are employees of ASR Wealth Advisers, is discussed further below in relation to our PATS desk and general advice adviser service offerings.

ASR Wealth Advisers offers a text-to-trade (T2T) service which requires clients to agree to specific terms and conditions. If you would like to participate in our text-to-trade service, please speak with your adviser and we can arrange for the relevant arrangements with you.

The licensee and the authorised representatives discussed in this FSG act on your behalf when financial services are provided to you.

## What services and products are we authorised to provide to you?

ASR Wealth Advisers is authorised to deal in, and provide general advice, for the following classes of financial products to retail and wholesale clients:

- basic deposit products;
- derivatives;
- foreign exchange-contracts; and
- exchange traded securities both Australian and international
- Interests in Managed Investment Schemes including IDPS, securities and standard margin lending facilities .

We are authorised to provide these services and products to both retail and wholesale clients. Please note that while the licensee is authorised to provide personal advice, you will not be provided with personal advice at any time for any financial products or services.

#### **We offer two different service offerings to clients:**

1. **PATS (premium active trading service) desk** - for a subscription fee, clients of the PATS desk receive regular trading ideas and can then place trades on securities themselves or by their adviser with *\*Ascot Securities Pty Ltd* or a broker of their own choice.
2. **General Advice adviser** – once you are a subscriber to an ASR Wealth Advisers Report, you can talk to an adviser who will assist you with your portfolio on a general advice basis and arrange for your trades to be placed with *\*Ascot Securities Pty Ltd* for execution and settlement with a third party clearer or with a broker of your choice.

*\*Ascot Securities Pty Ltd AFSL 246718 is a related entity of the Amalgamated Australian Investment Group Limited ABN 81 140 208 288 (“AAIG”) and its related entities.*

ASR Wealth Advisers provide financial services in relation to interests in managed investment schemes that are managed by APSEDC Funds Management Pty Ltd (ABN 30 142 148 409) (APSEC) and by DomaCom Australia Limited (ABN 33 153 770) (DomaCom).

In providing our services, other financial matters may arise, however, we are not authorised to assist with any financial and product services except those explained above. You should seek specific advice from the appropriate professionals on other matters relevant to you.

If you do not understand any of the information in this Financial Services Guide, or have any other questions relating to the terms on which we will be acting, please contact us at the Licensee details above.

#### **General Advice**

Trilogy and its authorised representatives will only ever provide you with General Advice which is a rating or assessment based solely on the attributes of the financial product, the portfolio or investment strategy alone without considering whether it is also appropriate for your investment objectives, financial situation or particular needs.

General Advice includes research reports and newsletters and may also be provided verbally by your adviser. You must not assume that Trilogy’s research recommendations or ratings are appropriate for you personally. The process of profiling a client’s circumstances and objectives is not relevant in relation to General Advice. General Advice may be derived from fundamental analysis; ie. analysis of financial reports, or technical analysis (patterns in market trading and price-movement behaviour).

#### **General Advice Warning**

General Advice will be accompanied by the warning that the advice is not prepared for you personally and may not be appropriate for any particular person, and that you will need to consider whether acting on the advice is appropriate in light of your investment objectives, financial circumstances or particular needs. If a Disclosure document or PDS is relevant for the product recommendation, the warning will also highlight the need, before making a decision to invest, to ensure you read and carefully consider the Disclosure document or PDS. The fact that you may see our General Advice; eg. research reports, does not mean we are providing advice tailored to you personally.

Additionally, we will not monitor or manage your portfolios or enter trades on your behalf without your instructions and consent.

#### **Product Disclosure Statement**

If required for specific products, we will provide you with a Product Disclosure Statement (PDS) which you should read before making a decision whether or not the product is right for you.

A PDS is issued by the product provider and contains information about the product to assist you in making an informed decision about the financial product. It will outline relevant terms, significant risks, and fees and charges associated with the product.

#### **What do you pay for our services?**

The fees you may need to pay for our services includes, but is not limited to:

- Brokerage fees on trades executed by one of our trading platform service partners;
- Administration fees;
- Subscription or service fees for regular reports that are calculated as a fixed price, paid at periodic intervals. Your adviser will notify you of the amount of the relevant subscription fee;
- Advice fees relevant to any Macrovue account you hold; and
- Other fees or benefits that are paid with your consent.

All fees described in this FSG include GST.

You may be charged some or all of these fees, or a combination of them, based on the particular services you agree to use.

### **Brokerage (excluding transactions conducted and executed on the Macrovue platform)**

We receive brokerage fees when we introduce you to a trading platform service partner through our execution or general advice service, and you buy or sell one of the following financial products:

- **Securities transactions** - The brokerage fee charged for each transaction will typically be the greater of 1.1% or \$110 unless otherwise stated. Brokerage fees are added to the purchase price of a buy transaction and deducted from the proceeds of a sell transaction. Brokerage is settled on T+2 (being two Business Days after the trade date) for share transactions.

These may be amended from time to time and you may request an update from [compliance@trilogypgroupaustralia.com](mailto:compliance@trilogypgroupaustralia.com).

### **Macrovue platform**

Macrovue Pty Ltd ABN 98 600 022 679 AFSL 484264 operates a platform on which you can trade domestic and international securities. It also provides ongoing research on thematic portfolios of stocks (called a Vue) in which you may choose to invest. ASR Wealth Advisers receives the following remuneration for providing general advice and execution services in relation to you if you have a Macrovue account.

Macrovue fees are available on their website <https://www.macrovue.com.au/pricing> which include:

- **Vue research fee** is payable for the ongoing general advice provided via the Macrovue platform;
- **Platform access fee** is charged annually for providing access to the Macrovue platform;
- **Brokerage fees** for arranging execution of Australian and international equities.

Where you trade with the assistance of our general advice advisers, a brokerage fee will be charged in each transaction:

1. a dollar value for transactions with a trade value of up to \$12,500; and
2. a percentage of the trade value, for transactions with a trade value of \$12,501 or more.

Where you place your orders with our **PATS trading desk**,

1. a flat brokerage fee will apply for orders with a value of up to \$10,000, or
2. a percentage of the trade amount for orders of \$10,001 or more.

These fees include trades of all equities (shares) in a Vue.

- **FX conversion fee:** ASR Wealth Advisers receives 0.5% (or as updated on the website from time to time) of the value of foreign currency needed to buy the international equities (shares).

These fees may be amended and you must check the Macrovue website for amendments.

## **How are we and third parties remunerated?**

### **ASR Wealth Advisers**

Directors of ASR Wealth Advisers are paid by way of set salaries and contract fees. Each of these parties may receive bonuses based on overall company, team and personal performance.

Where eligible, your adviser will receive a portion of the amount received by ASR Wealth Advisers, whether as a salary or a bonus or both. This is discussed further below. ASR Wealth Advisers also pays a fixed monthly fee to the licensee.

Where ASR Wealth Advisers provides advice or another service that leads to the purchase of a new subscription or service provided by a related entity in the AAIG group, ASR Wealth Advisers will pay 20% of the subscription or service fee to that related entity.

Where a related entity in the AAIG group provides advice or another service that leads to the purchase of an ASR Wealth Advisers Report or subscription, that entity will retain 80% of the subscription fee.

ASR Wealth Advisers pays DomaCom Limited 20% or \$200 (whichever is the lesser) of the first annual subscription fee paid to ASR Wealth Advisers by all Property Report subscribers.

These may be amended from time to time and you may request an update from [compliance@trilogypgroupaustralia.com](mailto:compliance@trilogypgroupaustralia.com).

### **Employees**

#### **General Advice advisers**

General Advice advisers who are appointed by the licensee are paid a salary. General Advice advisers will be eligible to receive a bonus if their advice leads to a certain volume of financial product transactions within a particular calendar year. Once eligible,

general advice advisers receive the following:

- up to 40% of net brokerage fees up to maximum \$40 per trade that ASR Wealth Advisers receive (whether those transactions were conducted via Macrovue or another platform) and that are referred to the adviser's services;
- 0.2% of the value of all equities in a Vue referable to the adviser's services; and
- up to 20% of subscription fees referable to the adviser's services.

These may be amended from time to time and you may request an update from [compliance@trilogygrouppaustralia.com](mailto:compliance@trilogygrouppaustralia.com).

### **PATS desk advisers**

PATS desk advisers may also receive a bonus if they achieve certain customer-service related performance targets within a particular calendar year. Any such bonus is awarded on a discretionary basis (for example, as a lump sum or a percentage of the adviser's salary) and is not based on volume of trading.

ASR Wealth Advisers' (Atlantic Pacific Securities Pty Ltd) shareholders may also receive a benefit based on its ongoing company performance.

**Sub Authorised Representatives** (advisers) of ASR Wealth Advisers are employed by and are appointed by Atlantic Pacific Securities Pty Ltd.

### **The Licensee**

Trilogy directors and employees (including any employees of a related body corporate) may be remunerated by salary and may also be awarded an annual bonus. Bonuses will depend on several factors including:

- company performance;
- professionalism and adherence to compliance procedures; and
- team performance.

Trilogy shareholders (including any shareholders of a related body corporate) may also receive a benefit based on the Licensee's ongoing company performance.

You may request more details about the way these people or entities are remunerated within a reasonable time after receiving this document and before any financial services are provided to you.

### **What arrangements may influence our advice to you?**

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued at or above \$300, and other benefits that relate to information technology, software or support provided by a product issuer, or that relate to educational and training purposes. All alternative forms of remuneration require management approval.

### **What is 'Investment Risk'?**

By 'risk' we mean the possibility that you will suffer some financial harm by investing. Your preparedness and capacity to carry a particular level or type(s) of risk in pursuit of your investment strategy is a fundamental element of your financial circumstances.

**General risk disclosure statement and guidance for investors** We will explain to you any significant risks associated with investments or strategies which we recommend to you. If we do not do so, you should ask us to explain those risks to you. Other Risks in general, the risk of investing in financial products can be categorised in the following manner however, these do not purport to be complete because it would not be feasible to list all the possible risks in each category.

**Equity securities** Equity securities in common with all the other asset classes; eg. interest rate securities and property investments, can decline in value as well as appreciate. The measure of this change in value is often referred to as 'volatility'. The more the value varies over time, the more volatile the asset is and therefore the more risk involved in investing in it. On the other hand the less volatile an asset is, the less likelihood there is for any significant capital gain or loss from investing in that asset. Equity securities (e.g. shares) are generally more volatile than other asset classes however, the markets for other asset classes are not as efficient or transparent as the stock market in terms of the information available to investors and the process for continuously determining and making public the real market value of the particular asset. For this reason the real volatility of those other assets is often not fully appreciated. Only General Advice is offered for Equities.

**Overall market risk** This is the risk of loss by reason of movements in the share market generally. These movements can be caused by any number of factors including political, economic, taxation or legislative factors. Specific examples are changes in interest rates, political changes, changes in taxation or superannuation laws, international crises or natural disasters.

**Limitations of research** By 'research' we are referring to printed material that expresses an opinion about particular securities, companies or economic news. The research produced internally and/or outsourced by Trilogy, is basically the opinion of specialist analysts. It can never be guaranteed and it is only valid for a limited time and is often subject to market movements. For example, for short term investors a 'buy' recommendation could turn into a 'sell' recommendation if the market price of a

share appreciated by a small amount. For the longer term investor, this market movement may not be significant, although a larger movement may be.

The mere fact that an entity is recommended by an analyst in a research report as a “Buy”, “Sell” or a “Hold” does not necessarily mean that the entity or that recommendation is a suitable investment for you. The recommendation is based on consideration of the investment merits of the entity alone. You should always consult your adviser before acting on any research report. Likewise, any share price targets that may be forecast in a report are based on particular assumptions made by the analyst at the time the report is prepared. A forecast ‘target’ price is not a guarantee that the price will actually reach that level.

### **What should you do if you have a complaint?**

If you are dissatisfied with the services, we have provided to you which we consider to be a complaint, you can contact your adviser and the Licensee to discuss your complaint.

We encourage you to contact your adviser to discuss your concerns as soon as possible. If you are still dissatisfied, we ask that you put your complaint in writing together with a copy of the relevant documents to evidence your complaint, and send it to:

Complaints Officer  
Trilogy Group Australia Pty Ltd  
By email to [compliance@trilogygrouppaustralia.com.au](mailto:compliance@trilogygrouppaustralia.com.au)  
OR

By mail to Level 14 360 Collins Street Melbourne Victoria 3000

The Complaints Officer will resolve your complaint or advise you of the steps that Trilogy shall take to review and address your complaint. The issues involved may be complex and subject to special regulations. We will do our best to resolve your complaint quickly and fairly.

If we are unable to resolve your complaint to your satisfaction within the relevant period 45 days (and effective 5 October 2021 within 30 days) of receiving it, we will advise you in writing of that outcome. We will advise you if this longer period is required. These periods are specified by the Rules of the Australian Financial Complaints Authority (AFCA) and they may change. Trilogy is a member of AFCA.

If your complaint isn't resolved to your satisfaction within the relevant period, you may then refer the matter to AFCA, an ASIC authorised complaints resolution authority for the financial services industry.

Australian Financial Complaints Authority  
GPO Box 3, Melbourne Victoria 3001  
Phone Toll Free on: 1800 931 678 (Australia wide) Fax: +61 3 9613 6399  
Email: [info@afca.org.au](mailto:info@afca.org.au) Website [www.afca.com.au](http://www.afca.com.au)

The ASIC also has a free call infoline on 1300 300 630 which you can use to make a complaint about our or your FSP's services and to obtain information about your rights.

### **Compensation arrangements**

We maintain adequate professional indemnity insurance as required by s912B of the Corporations Act. This insurance provides cover for claims made against us and our representatives, including claims in relation to the conduct of representatives who no longer work for us but who did so at the time of the relevant conduct.

### **Privacy**

We are committed to protecting the privacy, accuracy and security of the personal information provided to us about you by you or others who you have consented to provide such information. The information is protected in accordance with our Privacy Policy.

Your personal information will be used for establishing and maintaining you as an account holder, to facilitate transaction execution and settlement, registration of your holdings of financial products, and to provide other related services to you through your adviser. If you choose not to provide the personal information requested, we may be unable to provide some or all of the services required. We are obliged to confirm and record your identity in accordance with legislation including the Corporations Act and AML/CTF Act. Consequently, you must notify us immediately of changes to personal information; eg. change of address.

Your Personal Information will only be disclosed internally within Trilogy and third party service providers in accordance with our Privacy Policy and as required by law. Please refer to our Privacy Policy statement which is available at [www.trilogygrouppaustralia.com.au](http://www.trilogygrouppaustralia.com.au) or can be sent directly to you via email or post on request.

### **Recording telephone conversations**

You acknowledge that Trilogy and its authorised representatives may record telephone conversations between us. If a dispute arises between you and Trilogy or its authorised representatives, you have the right to listen to any recording of those conversations, if recorded. Please contact [compliance@trilogygrouppaustralia.com.au](mailto:compliance@trilogygrouppaustralia.com.au) for more information on this.