

# FINANCIAL SERVICES GUIDE

Preparation Date: 01 January 2019



**bombora**

## Contents

|   |                 |
|---|-----------------|
| <b>PART 1: About Bombora</b>  | <b>3</b>        |
| <b>SECTION 1: FINANCIAL SERVICES GUIDE</b>  | <b>3</b>        |
| What other information should you consider before deciding whether to proceed with our recommendations? | 3               |
| Who provides the financial services described in this FSG?  | 4               |
| Who is responsible for those financial services?  | 4               |
| What financial services do we offer?  | 4               |
| What products are available?  | 4               |
| How do we ensure that the advice we give you suits your needs and objectives?                           | 5               |
| What documents do you get if we provide further advice?   | 5               |
| How can you instruct us?  | 5               |
| Other services  | 6               |
| How are we paid for our services?   | 6               |
| What type of fees, commissions, payments and other benefits do we receive for our services?             | 6               |
| Does Bombora charge any fees?   | 8               |
| Other benefits  | 8               |
| Will any other parties benefit from the financial services offered in this FSG?                         | 8               |
| What arrangements may influence our advice to you?  | 8               |
| What fees do we pay to someone who refers you to us?  | 8               |
| <b>SECTION 2: PRIVACY STATEMENT</b>   | <b>8</b>        |
| Why we collect your personal information  | 8               |
| Collecting and disclosing your personal information   | 9               |
| Other important information   | 9               |
| Definitions   | 9               |
| <b>SECTION 3: ARE YOU SATISFIED?</b>  | <b>9</b>        |
| What to do if you have any concerns about our services  | 9               |
| <b>PART 2: Advisor Profile</b>  | <b>attached</b> |



This Financial Services Guide has been authorised for distribution by the authorising licensee:

Bombora Advice Pty Ltd  
 (Bombora)  
 ABN 40 156 250 565  
 Australian Financial Services  
 Licence No. 439 065 ('AFSL')  
 Level 2, 406 Collins Street,  
 Melbourne VIC 3000.  
 Email:  
[info@bomboraadvice.com.au](mailto:info@bomboraadvice.com.au)  
 Website:  
[www.bomboraadvice.com.au](http://www.bomboraadvice.com.au)

## PART 1

This Financial Services Guide ('FSG' or the 'Guide') provides you with important information about Bombora Advice Pty Ltd ('Bombora' or 'Licensee'), and its Authorised Representatives, who will provide you with the financial services described in this Guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your Adviser.

This Guide consists of two parts. Part 1 of this Guide contains important information about:

- the financial services we offer as Authorised Representatives of Bombora;
- Bombora as the holder of an AFSL;
- the financial services that Bombora offer;
- the process we follow to provide financial services;
- how we, our associates, and Bombora are paid;
- any arrangements which may influence our advice to you;
- how we and Bombora protect your privacy; and
- who to contact if you have a complaint or if you are not satisfied with the services provided.

Part 2 of this Guide is an Adviser Profile and includes information on the services we are authorised to provide on behalf of Bombora. References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either Bombora or your 'Authorised Representatives' of Bombora, as the context requires.

### Part 1 contains the following sections:

- Financial Services Guide (Section 1);
- Privacy Statement (Section 2); and
- Are you satisfied? (Section 3).

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG which we, as Authorised Representatives, are required to provide.

## About Bombora

**Bombora Pty Ltd was formed in July 2013 by a group of like-minded Advisers who wanted to form a business to provide the highest levels of professional advice to their clients in a business relationship which matched their collective views on advice preparation, advice delivery and client service.**

Bombora is a privately owned licensee with a network of Advisers operating nationally.

Bombora holds AFSL No. 439065 issued by the Australian Securities and Investments Commission and is a Professional Partner of the Financial Planning Association of Australia (FPA), and a member of the Association of Financial Advisers Ltd. As a member of these bodies, we adhere to set standards in terms of ethics, conduct and continuing education.

As an Authorised Representative, we act on behalf of Bombora when providing the financial services we are authorised to provide under Bombora's AFSL. Further information on these services is set out in Part 2 of the FSG, Adviser Profile.

### Bombora Advice Pty Ltd Registered Office:

Level 2, 406 Collins Street  
Melbourne VIC 3000  
**Ph:** 1300 653 097  
**Fax:** (03) 9602 4243  
**E:** info@bomboraadvice.com.au

### Bombora Advice Pty Ltd Corporate Office is:

Suite 12, 333 Canterbury Road  
Canterbury VIC 3126  
**Ph:** 1300 653 097  
**Fax:** (03) 9602 4243  
**E:** info@bomboraadvice.com.au

## SECTION 1 FINANCIAL SERVICES GUIDE

### What other information should you consider before deciding whether to proceed with our recommendations?

If you receive personal financial advice this will be documented in a Statement of Advice (SoA), or in specific circumstances a Record of Advice (RoA), that confirms the discussions you have had with us, the recommendations we are making and the basis for those recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations with financial product providers.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

## Who provides the financial services described in this FSG?

The financial services described in this FSG are provided by us as Authorised Representatives of Bombora.

Part 2 of this Guide contains further details about your Adviser, our experience, qualifications and professional memberships.

## Who is responsible for those financial services?

As the holder of an AFSL, Bombora is responsible for the financial services we provide to you. Bombora acts on its own behalf when these financial services are provided to you.

In relation to the financial services offered in this FSG, Bombora, as the holder of an AFSL, does not act on behalf of any other person or licensee. Bombora is only responsible for the services offered in this FSG.

The law requires Bombora to have arrangements in place to compensate certain persons for loss or damage they suffer from certain breaches of the Corporations Act by Bombora and/or its Authorised Representatives. Bombora has internal compensation arrangements as well as professional indemnity insurance that satisfy these requirements.

## What financial services do we offer?

**Bombora is able to provide financial product advice and to deal in a wide range of products (unless otherwise stated in Part 2 of this Guide) including:**

- Deposit products;
- Government debentures, stocks or bonds;
- Life investment and life risk products;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Retirement savings account products;
- Securities (e.g. shares); and
- Superannuation products.

**Some of the services you are able to access through Bombora include:**

- Personal and business insurance advice
- Superannuation and rollover advice
- Retirement planning advice
- Investment planning advice; and
- Portfolio review services

**Bombora is registered with the Tax Practitioners Board as a Tax (Financial) Adviser. A Tax (Financial) Advice service is:**

- Provided in context of the advice provided by an Adviser under an AFSL; and
- The part of financial advice that interprets and applies the tax laws (including tax, superannuation and SMSF laws) to your personal circumstances.

Whilst Bombora is registered as a Tax (Financial) Adviser, we are not registered tax agents and only provide services directly related to the nature of the advice provided to you. We recommend you consult with a registered tax agent to confirm your taxation position.

Bombora also has access to a referral network who provide advice on tax and estate planning. Where required, these specialist areas of advice will be provided only by referral. Whether you use our referred partner, or a professional that you currently have an involvement with, they will be responsible for the advice provided to you. If you require advice on a wider range of products or complex issues you may be referred to another financial services provider.

## What products are available?

A range of financial products offered by many leading financial product providers are available for recommendation by us. Details of the available investment products we can recommend are contained within our Approved Product List (APL).

We have an open APL when providing risk insurance advice, meaning we are able to provide advice on all personal and group risk insurance products.

Research houses provide us with financial product research, which is used to carefully select and maintain an extensive list of Approved Products for us to select from.

We will only recommend a product to you after considering its appropriateness to your individual objectives, financial situation and needs. The recommendations will be made after conducting an investigation into the financial products and may require us to investigate and consider a financial product which is not on the APL.

Bombora has established a Risk Partner Program with various life insurance underwriters, which provides support and resources to assist us in the delivery of life insurance advice.

## How do we ensure that the advice we give you suits your needs and objectives?

To ensure your Adviser provides personal advice that is appropriate, we firstly need to understand your objectives, financial situation and needs.

### Your Adviser (referred to as 'we' below) will follow a step-by-step process as outlined below:

- 1) We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services we can offer.
- 2) We will collect all the information we need from you, including your objectives, financial situation and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing all of this information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter you request. Please ensure you keep your Adviser updated with any changes to your personal situation including matters of health and finance.
- 3) We will help you identify your goals and may discuss your attitude towards investment risk.
- 4) We may consider strategies and areas such as income, social security, insurance, cash and estate planning requirements. Where we recommend a financial or insurance product we will also conduct a reasonable investigation into that product, ensuring it is suitable to implement the recommended strategy. Based on these and other considerations, we will prepare and present to you a written SoA, or in some cases depending on the circumstances, an RoA. We will explain in the SoA (or RoA) the basis for the advice, and any remuneration, benefits or associations which could have influenced the advice. Where we recommend financial or insurance products, we will provide you with a PDS or other disclosure documents containing information about each product recommended, to help you make an informed decision about whether to invest in or acquire that product.

- 5) We will discuss our recommendations with you, make any changes you require and ask you whether you would like us to implement those recommendations on your behalf.
- 6) Carefully consider our advice, including the implications and risk associated with our recommendation before making your decision to proceed.
- 7) We will meet with you periodically to review your financial circumstances and/or insurance needs. In some circumstances we may enter into an ongoing advice service arrangement, this will be documented in an Ongoing Advice Service Arrangement letter and/or SoA. Where you have entered into an ongoing fee arrangement after 1 July 2013, we will renew your arrangement with you at a minimum of every two years.

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further.

Where general advice is provided, we will not provide you with personal advice via a SoA or RoA. General advice is received by attending one of our seminars or receiving one of our newsletters. If you would like further information regarding the general advice and how it may benefit you, please contact your Adviser.

## What documents do you get if we provide further advice?

Where we provide further advice and your circumstances have not significantly changed, we will provide you with a Record of Advice (RoA).

In the event your circumstances have changed significantly from our previous advice, we will provide you with a SoA.

## How can you instruct us?

You may specify how you would like to give us instructions, for example, by phone, fax or email using any of the contact details set out in Part 2 of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

## Other services

We may provide services other than financial planning and personal risk insurance services. For example, we may also act as your accountant or legal adviser, or advise you on real estate investments, health insurance or your finance needs. While we may provide these other services, you should understand that these other services are not provided under Bombora's AFSL and Bombora does not train, support or supervise the provision of these other services and has no responsibility in relation to these services.

### Examples of the services which Bombora is not responsible for include:

- general insurance services (e.g. car, home, landlord insurance);
- real estate and direct property advice;
- taxation services, such as completion of tax returns;
- accounting and audit services;
- legal services;
- credit activities;
- private health insurance;
- consulting services; and
- administration and compliance of Self-Managed Superannuation Funds.

## How are we paid for our services?

### We and Bombora may receive:

- fees paid by clients;
- commissions paid by product providers;
- other payments by product providers; and
- other benefits.

Fees and commission payable (as directed by your Authorised Representative) to Bombora, Authorised Representatives, Corporate Authorised Representatives or to any other approved party. We may receive up to 100% of any fees and commissions received by Bombora.

Details of any fees, commission or other benefits that we, Bombora or other associated persons are entitled to receive if you implement our recommendations in relation to a specific financial product, will be disclosed to you in your SoA or RoA when personal advice is given.

## What type of fees, commissions, payments and other benefits do we receive for our services?

If the fees, commission or other benefits are not calculable at the time we provide personal advice, we will describe the manner in which they are calculated at the time the advice is given or as soon as practicable after. If you receive general advice you may request particulars of the fees, commissions and other benefits that we may receive, within a reasonable time after this FSG is given to you.

The types of fees, commissions and other benefits that may be received by us and by Bombora include the following:

### SERVICE FEES

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination or part of, any of these fees.

#### Fees for advice

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement to the fees before we provide you with advice.

#### Ongoing advice fees

We may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be agreed with you and is either a set amount, or an amount based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio and circumstances.

#### Referral fees

If we refer you to another business to provide you with services, we may receive referral fees. Those fees may vary according to the party to whom we are referring, and the products involved. We will provide written notification to you if we are likely to receive referral fees for referring you to another service provider.

#### Payment methods

Our fees are either invoiced to you directly or deducted from your investments, paid by product providers or a combination of these methods.

Where it is debited from your investments, it is normally referred to as the Adviser Service Fee.

In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

#### Commissions

Initial and ongoing commissions from insurance providers may be received by Bombora. These commissions are paid to Bombora by the company that issues the product that Bombora's Advisers recommend to you and are included in what you pay for the product. The commissions vary and are based on the policy cost, which is the sum of the premiums you pay and may include other fees related to the product.

The initial commission is paid in the first year by the product issuer to Bombora. Ongoing commissions are payments paid by product issuers to Bombora in the years after the first year. If you initiate an increase to your cover, Bombora may receive initial and ongoing commissions on the annual increase to your policy cost. The ongoing commission on a client initiated increase is only paid in respect of the period that starts from the first anniversary of the increase.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), Bombora may receive up to 80% (excl. GST) of your annual policy cost. If the initial commission is higher than the ongoing commissions, the maximum commission that Bombora may receive is set out in the table below.

| Date a new product is issued       | Initial Commission (% of annual policy cost Or increase excl. GST) | Ongoing Commission pa (% of annual policy cost Or increase excl. GST) |
|------------------------------------|--|---|
| January 2018 - 31 December 2018*   | 0 - 80%  | 0 - 20%   |
| 1 January 2019 - 31 December 2019* | 0 - 70%  | 0 - 20%   |
| From 1 January 2020*               | 0 - 60%  | 0 - 20%   |

\* Bombora may receive the pre 1 January 2018 commission rates above from the product issuer if:

- > your policy was issued before 1 January 2018 and you exercise an option to establish new or additional cover under your policy after 1 January 2018; or
- > your policy was issued before 1 January 2018 and is replaced after 1 January 2018 to correct an administrative error.

#### Example

We recommend an insurance product to you and it is issued on 2 February 2018. The annual policy cost is \$450. Bombora may receive up to \$360 (80% excl. GST) as an initial commission and may pass up to \$360 to us. Assuming the policy cost stays the same each year, Bombora may receive up to \$90 pa (20% excl. GST) as an ongoing commission and may pass up to \$90 pa to us.

From 2 April 2018, you decide to increase your insurance cover. The cost of this increased cover is \$100. The initial commission payable to Bombora in respect of this increase will be \$80 (80% excl. GST) as the increase has occurred in 2018. The ongoing commission payable to Bombora in respect of this increased policy cost will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2019). These commissions may be passed onto us.

From 2 April 2020, you decide to increase your insurance cover again. The cost of this increased cover is \$100. The initial commission payable to Bombora in respect of this increase will be \$60 (60% excl. GST). The ongoing commission payable to Bombora in respect of this increase will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2021). These commissions may be passed onto us.

You'll find details of how your insurance policy cost is calculated in the relevant PDS that we provide you. Where personal advice is provided to you, you'll also find details of the commission that Bombora and we are entitled to receive if you decide to purchase a life insurance product, in your SoA or RoA.

#### INSURANCE PARTNER PROGRAM

In addition, Bombora may receive benefits as part of the Insurance Partner Program in the form of education, training and other support and resources to assist in the delivery of life insurance advice. Participants in the Insurance Partner Program may pay a fee to Bombora. Participants may be given the opportunity to provide training about their life insurance products. The total amount of fees, or the fees that may be paid by each individual life insurance product provider, will depend upon the commercial arrangements that may be negotiated from time to time between Bombora and each product provider. These payments will not change the amount of the policy cost payable by you.

Bombora or its Advisers may be entitled to receive partnership payments from product issuers. This may be by way of additional commission. Payments are dependent on in force premiums as at 31 December 2017 taking into account premium increases and lapse rates for Bombora and its Advisers collectively or individually.

Bombora and your Adviser may have these types of arrangements in place with any product issuer on its APL. A copy of our APL is available on request from your Adviser.

## Does Bombora charge any fees?

Bombora will not charge you any additional fees. Bombora will remit to its Advisers all fees and commissions we receive for the advice and services provided to you. Bombora does charge your Adviser an annual fee for licensing and support services, which will be collected from your Adviser on a monthly basis.

## Other benefits

From time to time we may accept alternative forms of remuneration from product providers or other parties. These benefits may include benefits 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 over \$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.

A copy of the register is available on request for a small charge.

## Will any other parties benefit from the financial services offered in this FSG?

Our Authorised Representatives may be associated with other services providers outside of the services they are authorised to provide under Bombora's AFSL. When these products or services are provided to you, details of these fees or benefits and how they are calculated will be disclosed in the relevant PDS or other disclosure document that will be provided to you.

## What arrangements may influence our advice to you?

Bombora's Approved Product List includes a range of financial products from product providers not associated with Bombora. We will assess your individual needs and circumstances, ensuring we recommend products that are in your best interest. After completing our research, if we believe a product is better suited to your individual needs and circumstances that is not on our approved product list, we will follow our non approved product process.

Neither Bombora nor our Advisers are associated with any financial product issuer. However, Bombora does have an agreement with MLC whereby MLC provides Bombora with a range of back office support services to assist us in running our AFSL. These support services include, software, product research, compliance and other related services. MLC is a part of the NAB Group of companies.

Bombora has an agreement with BT Select to provide Bombora with ongoing Governance support in the form of training, risk and compliance framework assistance, compliance policies and procedures. BT Select is part of the Westpac Group of companies.

Bombora has an agreement with Assured Support for our audits, which is required to maintain a licence with ASIC.

Any other relationships or associations we have that may influence our advice to you will be disclosed in Part 2 of this FSG.

## What fees do we pay to someone who refers you to us?

If you are referred to us we may pay the referrer a fee. We may also provide the referrer with gifts such as branded promotional items, hampers or gift vouchers.

The fee varies according to the referrer and financial products involved.

The fee may be a percentage of our fees, a percentage of the total amount invested paid through the referral, or a flat fee. We may pay these fees upfront when the financial service is provided, or the financial product is provided, or periodically as ongoing fees.

# SECTION 2 PRIVACY STATEMENT

## Why we collect your personal information

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.



## Collecting and disclosing your personal information

We may disclose your personal information to members we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties such as a complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

We may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Bombora is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations.

We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

## Other important information

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy.

**Our privacy policy is available at [www.bomboraadvice.com.au](http://www.bomboraadvice.com.au). It covers:**

- how you can access the personal information we hold about you and ask for it to be corrected;
- how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and;
- how we collect, hold, use and disclose your personal information in more detail.

We will update our privacy policy from time to time.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

## Definitions

"We", "our", "us" means Bombora Advice Pty Ltd and its Authorised Representatives

## SECTION 3 ARE YOU SATISFIED?

### What to do if you have any concerns about our services

Both we and Bombora endeavour to provide you with quality financial and personal risk insurance advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

- 1) Contact your Adviser first about your concern.
- 2) If your concern is not resolved to your satisfaction, you may contact Bombora by:

**Writing:**

General Manager  
Bombora Advice Pty Ltd  
Level 2, 406 Collins Street  
Melbourne VIC 3000

**Email:** [info@bomboraadvice.com.au](mailto:info@bomboraadvice.com.au)

**Phone:** 1300 653 097

- 3) If your concern is not resolved, or if you are not satisfied with the decision, you may contact the Australian Financial Complaints Authority (AFCA).

AFCA independently and impartially resolves disputes between consumers and financial service providers.

You may contact AFCA by:

**Writing:**

Australian Financial Complaints Authority  
GPO Box 3  
Melbourne VIC 3001

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Website:** [www.afca.org.au](http://www.afca.org.au)

**Phone:** 1800 931 678

- 4) The Australian Securities & Investments Commission (ASIC) is Australia's corporate, markets and financial services regulator. ASIC contributes to maintaining Australia's economic reputation by ensuring that Australia's financial markets are fair and transparent, and is supported by informed investors and consumers alike. ASIC seeks to protect consumers against misleading or deceptive and unconscionable conduct affecting all financial products and services.

You may contact ASIC by:

**Writing:**

Australian Securities & Investments Commission  
GPO Box 9827  
Your Capital City

Or

PO Box 4000  
Gippsland Mail Centre  
Victoria 3841

**Website:** [www.asic.gov.au](http://www.asic.gov.au)

**Phone:** 1300 300 630

Before you send your concern to any of these respective bodies, please contact them first to understand the process of lodging your concern with them.

- 5) The Association of Financial Advisers (AFA) is a professional association. Members of the AFA are required to comply with a Code of Conduct and are subject to investigation and disciplinary action.

In accordance with their by-laws, the AFA will appoint an investigating officer to review your complaint, which may then be escalated to a disciplinary committee to take necessary action that could include a reprimand, suspension or termination of membership.

Where your Adviser is a member of the AFA and you have a complaint in relation to the service you received, you may contact the AFA by:

**Writing:**

The Investigations Manager  
Association of Financial Advisers  
PO Box Q279  
Queen Victoria Building  
Sydney NSW 1230

**Email:** [info@afa.asn.au](mailto:info@afa.asn.au)

**Website:** [www.afa.asn.au](http://www.afa.asn.au)

**Phone:** (02) 9267 4003

- 6) The Financial Planning Association of Australia Limited (FPA), is the peak professional body for financial planning in Australia. The FPA provides the leadership and professional framework that enables members to deliver quality financial advice to their clients. All FPA members are bound by professional, technical and ethical standards as provided in the FPA Code of Professional Practice. The FPA has effective and appropriate policies and procedures in place to assist you with your complaint and ultimately help protect consumers and those planners doing the right thing. You may contact the FPA by:

**Writing:**

The Investigations Manager  
Financial Planning Association of Australia Ltd  
GPO Box 4285  
Sydney NSW 2001

**Website:** [www.fpa.asn.au](http://www.fpa.asn.au)

**Phone:** 1300 626 393

Before you send your concern to any of these respective bodies, please contact them first to understand the process of lodging your concern with them.



**bombora**

Bombora Advice Pty Ltd  
ABN 40 156 250 565 AFSL 439065

# FINANCIAL SERVICES GUIDE

Part 2 (Adviser Profile)

Date: 1 April 2019



**bombora**

## PART 2

**Part 2 (Adviser Profile) contains the following sections:**

About Your Advisers (Section 1);  
Services our Advisers Provide (Section 2); and  
Fees and Charges (Section 3);

This document is Part 2 (Adviser Profile) of the Financial Services Guide (FSG) dated 1 January 2019 and should be read together with Part 1.

Part 2 sets out specific details about our Authorised Representatives of Bombora Advice Pty Ltd (Bombora). We are authorised by Bombora to provide the financial services described in Part 1 and Part 2 (Adviser Profile) of the FSG. We have also been authorised by Bombora to distribute this FSG.

Bombora Advice Pty Ltd ('Bombora')  
ABN 40 156 250 565 holder of Australian Financial Services Licence No.439065 ('AFSL')  
Level 2, 406 Collins Street, Melbourne VIC 3000

**Email:** [info@bomboraadvice.com.au](mailto:info@bomboraadvice.com.au)  
**Website:** [www.bomboraadvice.com.au](http://www.bomboraadvice.com.au)

## SECTION 1 ABOUT YOUR ADVISERS

### Who is your Adviser?

In this document, the terms 'I', 'me', 'us', 'we' and 'our' refer to your Adviser and David Davidson Financial Services, T/A Priority Life.  
ASIC No. 242396.

The term 'Representatives' refers generally to Bombora's Authorised Representatives.

Office contact details:

**Street Address:** 5c 28-30 Jackson Street,  
Toorak, VIC 3142

**Postal Address:** 5c 28-30 Jackson Street,  
Toorak, VIC 3142

**Phone:** 1300 122 436

**Fax:** 03 81999049

**Website:** [www.prioritylife.com.au](http://www.prioritylife.com.au)

### How can you provide your instructions to us?

You may provide us with instructions by using any of the contact details above.

## SECTION 2

### SERVICES OUR ADVISERS PROVIDE

#### David Davidson

**Authorised Representative**

**No.** 242298

**Mobile:** 0422 236 330

**Email:** david@prioritylife.com.au



#### What experience does your adviser have?

David has worked in the Financial Services sector for over 20 years, and is widely regarded as one of Australia's leading risk insurance advisers. He has a passion for the relationships with his clients, and working with them to find the best possible solution for them. David specialises in complicated medical and underwriting issues, and is well known for always working to find the best outcome available on the market for his clients.

#### What qualifications and professional memberships does your Adviser have?

David holds a Bachelor of Economics and Accounting, and a Diploma in Financial Planning. He is also a member of the Association of Financial Advisers.

#### Does your Adviser have any associations or relationships?

David receives director fees and profit share as a director of David Davidson Financial Service, T/A Priority Life as determined by the company as appropriate from time to time.

David receives a salary as an employee of David Davidson Financial Service, T/A Priority Life. David could also receive a performance bonus which may be based on certain performance criteria, such as the revenue David generates for David Davidson Financial Service, T/A Priority Life as well as several factors including successful audit results, meeting KPI's for client servicing and reviews. His bonus potential does not influence his advice, or any recommendations made.

#### What areas is your Adviser authorised to provide advice on?

David is authorised by Bombora to provide general and personal advice and deal in financial products and

financial services, including advice or services in the following areas:

- Life investment and life risk products;
- Superannuation products

#### Are there any services your Adviser is not authorised to provide?

David is not authorised by Bombora to provide advice or services in the following areas:

- Deposit products;
- Government debentures, stocks or bonds;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Derivatives;
- Consumer credit advice and assistance;
- Strategic advice about consumer credit and consumer credit referrals;
- Retirement savings account products;
- Securities (e.g. shares);
- Self-Managed Super Funds; and
- Finance broking

Please ask David if you would like a referral for these services. If David receives a specific fee for this referral, it is disclosed below in 'Fees and Charges'. It may also be disclosed in an advice document such as a Statement of Advice ('SoA'), if David provides you with personal advice.

## Bradley Gecelter

### Authorised Representative

No. 397714

Mobile: 0413 215 630

Email: brad@prioritylife.com.au



## What experience does your Adviser have?

Bradley Gecelter is a Priority Life Partner and has been part of the team for over 12 years. Throughout that time, he has grown to be a key contributor to the growth and success of Priority Life. Brad is kind and courteous and approaches his work with professionalism, integrity and with an understanding of the most complex insurance issues. Brad has significant expertise in getting claims paid and has been instrumental in having some of the largest claims our firm has ever been involved in paid to our clients. In some cases, Brad has negotiated multi-million dollar claim payouts for policy holders who did not even know about their eligibility to claim.

## What qualifications and professional memberships does your adviser have?

Bradley holds a Bachelor of Business and an Advanced Diploma of Financial Planning. He was a graduate of the MLC Advice Scholarship program and also received RMIT's most outstanding Management Student award in 2003. He is also a member of the Association of Financial Advisers.

## Does your Adviser have any associations or relationships?

Bradley receives profit share as a partner of David Davidson Financial Service, T/A Priority Life, as determined by the company as appropriate from time to time.

Bradley receives a salary as an employee of David Davidson Financial Service, T/A Priority Life. Bradley could also receive a performance bonus which may be based on certain performance criteria, such as the revenue Bradley generates for David Davidson Financial Service, T/A Priority Life, as well as several factors including successful audit results, meeting KPI's for client servicing and reviews. His bonus potential does not influence his advice, or any recommendations made.

## What areas is your Adviser authorised to provide advice on?

Bradley is authorised by Bombora to provide general and personal advice and deal in financial products and financial services, including advice or services in the following areas:

- Life investment and life risk products;
- Superannuation products

## Are there any services your Adviser is not authorised to provide?

Bradley is not authorised by Bombora to provide advice or services in the following areas:

- Deposit products;
- Government debentures, stocks or bonds;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Derivatives;
- Consumer credit advice and assistance;
- Strategic advice about consumer credit and consumer credit referrals;
- Retirement savings account products;
- Securities (e.g. shares);
- Self-Managed Super Funds; and
- Finance broking

Please ask Bradley if you would like a referral for these services. If Bradley receives a specific fee for this referral, it is disclosed below in 'Fees and Charges'. It may also be disclosed in an advice document such as a Statement of Advice ('SoA'), if Bradley provides you with personal advice.

## Aaron Zelman

### Authorised Representative

No. 277185

Mobile: 0412 366 643

Email: aaron@prioritylife.com.au



## What experience does your Adviser have?

Aaron lives and breathes Life insurance for doctors. Put another way, he loves helping his clients care for themselves and their families. Aaron has personally advised over 500 doctors and their families. His clients have successfully claimed over \$4m in disability and trauma claims throughout his 15-year career.

## What qualifications and professional memberships does your adviser have?

Aaron holds a Masters in Financial Planning and a Bachelor of Arts/Business. Aaron was awarded Risk Adviser of the year in 2015 and is a member of the Association of Financial Advisers.

## Does your Adviser have any associations or relationships?

Aaron receives profit share as a partner of David Davidson Financial Service, T/A Priority Life, as determined by the company as appropriate from time to time.

Aaron receives a salary as an employee of David Davidson Financial Service, T/A Priority Life. Aaron could also receive a performance bonus which may be based on certain performance criteria, such as the revenue Aaron generates for David Davidson Financial Service, T/A Priority Life, as well as several factors including successful audit results, meeting KPI's for client servicing and reviews. His bonus potential does not influence his advice, or any recommendations made.

## What areas is your Adviser authorised to provide advice on?

Aaron is authorised by Bombora to provide general and personal advice and deal in financial products and financial services, including advice or services in the following areas:

- Life investment and life risk products;
- Superannuation products

## Are there any services your Adviser is not authorised to provide?

Aaron is not authorised by Bombora to provide advice or services in the following areas:

- Deposit products;
- Government debentures, stocks or bonds;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Derivatives;
- Consumer credit advice and assistance;
- Strategic advice about consumer credit and consumer credit referrals;
- Retirement savings account products;
- Securities (e.g. shares);
- Self-Managed Super Funds; and
- Finance broking

Please ask Aaron if you would like a referral for these services. If Aaron receives a specific fee for this referral, it is disclosed below in 'Fees and Charges'. It may also be disclosed in an advice document such as a Statement of Advice ('SoA'), if Aaron provides you with personal advice.



## Wayne Boudrie

### Authorised Representative

No. 242269

Mobile: 0417 113 427

Email: wayne@prioritylife.com.au



## What experience does your Adviser have?

Wayne's history in the Financial Services industry is extensive both in Australia and overseas, stretching back to 1981 in the UK where he was the director of a major firm looking after partners of International law firms, members of British Parliament and the House of Lords. Wayne's wealth of experience and knowledge of the insurance market really shows through in his approach to assessing his client's needs and supporting them through to the best coverage option available.

## What qualifications and professional memberships does your adviser have?

Wayne holds an Advanced Diploma in Financial Planning and an Associate LIA Diploma (UK). Wayne is also a member of the Association of Financial Advisers.

## Does your Adviser have any associations or relationships?

Wayne receives a salary as an employee of David Davidson Financial Service, T/A Priority Life. Wayne could also receive a performance bonus which may be based on certain performance criteria, such as the revenue Wayne generates for David Davidson Financial Service, T/A Priority Life, as well as several factors including successful audit results, meeting KPI's for client servicing and reviews. His bonus potential does not influence his advice, or any recommendations made.

## What areas is your Adviser authorised to provide advice on?

Wayne is authorised by Bombora to provide general and personal advice and deal in financial products and financial services, including advice or services in the following areas:

- Life investment and life risk products;
- Superannuation products

## Are there any services your Adviser is not authorised to provide?

Wayne is not authorised by Bombora to provide advice or services in the following areas:

- Deposit products;
- Government debentures, stocks or bonds;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Derivatives;
- Consumer credit advice and assistance;
- Strategic advice about consumer credit and consumer credit referrals;
- Retirement savings account products;
- Securities (e.g. shares);
- Self-Managed Super Funds; and
- Finance broking

Please ask Wayne if you would like a referral for these services. If Wayne receives a specific fee for this referral, it is disclosed below in 'Fees and Charges'. It may also be disclosed in an advice document such as a Statement of Advice ('SoA'), if Wayne provides you with personal advice.

## Gary Douglas

### Authorised Representative

No. 1004854

Mobile: 0455 993 199

Email: gary@prioritylife.com.au



## What experience does your Adviser have?

Gary joined Priority Life in January 2018 and is a specialist risk insurance adviser with 25 years+ of experience. For the previous ten years Gary managed the personal and business insurance requirements for a Private Bank's high net worth clients in Melbourne and Adelaide. Gary's specialty is structuring tailored insurance portfolios for high income earning clients and negotiating the best terms available with insurance company underwriters. His strong communication skills combined with his professional and personal approach makes him a popular speaker; he has delivered insurance presentations to clients and advisers in New Zealand, South Africa, Vietnam, Thailand and Cambodia.

## What qualifications and professional memberships does your adviser have?

Gary holds a Diploma of Business and Education and a Diploma in Financial Planning. He is also a member of the Association of Financial Advisers.

## Does your Adviser have any associations or relationships?

Gary receives a salary as an employee of David Davidson Financial Service, T/A Priority Life.

Gary could also receive a performance bonus which may be based on certain performance criteria, such as the revenue Gary generates for David Davidson Financial Service, T/A Priority Life, as well as several factors including successful audit results, meeting KPI's for client servicing and reviews. His bonus potential does not influence his advice, or any recommendations made.

## What areas is your Adviser authorised to provide advice on?

Gary is authorised by Bombora to provide general and personal advice and deal in financial products and financial services, including advice or services in the following areas:

- Life investment and life risk products;
- Superannuation products

## Are there any services your Adviser is not authorised to provide?

Gary is not authorised by Bombora to provide advice or services in the following areas:

- Deposit products;
- Government debentures, stocks or bonds;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Derivatives;
- Consumer credit advice and assistance;
- Strategic advice about consumer credit and consumer credit referrals;
- Retirement savings account products;
- Securities (e.g. shares);
- Self-Managed Super Funds; and
- Finance broking

Please ask Gary if you would like a referral for these services. If Gary receives a specific fee for this referral, it is disclosed below in 'Fees and Charges'. It may also be disclosed in an advice document such as a Statement of Advice ('SoA'), if Gary provides you with personal advice.

## Raoul Shemer

### Authorised Representative

No. 239279

Mobile: 0418 541 623

Email: raoul@prioritylife.com.au



## What experience does your Adviser have?

Raoul is an accomplished risk adviser and has been in the insurance industry since 1983. Originally from South Africa, Raoul has vast experience in giving professional advice and supporting his clients through the various stages of their life. Empathetic and personable, Raoul injects care and compassion into his client relationships and builds special bonds with those he works with. He has exceptional communication skills and takes great joy in patiently listening to his clients and understanding their needs.

## What qualifications and professional memberships does your adviser have?

Raoul holds a Diploma of Civil Engineering and an Advanced Diploma in Financial Planning. Raoul is also a member of the Association of Financial Advisers.

## Does your Adviser have any associations or relationships?

Raoul receives a salary as an employee of David Davidson Financial Service, T/A Priority Life. Raoul could also receive a performance bonus which may be based on certain performance criteria, such as the revenue Raoul generates for David Davidson Financial Service, T/A Priority Life, as well as several factors including successful audit results, meeting KPI's for client servicing and reviews. His bonus potential does not influence his advice, or any recommendations made.

## What areas is your Adviser authorised to provide advice on?

Raoul is authorised by Bombora to provide general and personal advice and deal in financial products and financial services, including advice or services in the following areas:

- Life investment and life risk products;
- Superannuation products

## Are there any services your Adviser is not authorised to provide?

Raoul is not authorised by Bombora to provide advice or services in the following areas:

- Deposit products;
- Government debentures, stocks or bonds;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Derivatives;
- Consumer credit advice and assistance;
- Strategic advice about consumer credit and consumer credit referrals;
- Retirement savings account products;
- Securities (e.g. shares);
- Self-Managed Super Funds; and
- Finance broking

Please ask Raoul if you would like a referral for these services. If Raoul receives a specific fee for this referral, it is disclosed below in 'Fees and Charges'. It may also be disclosed in an advice document such as a Statement of Advice ('SoA'), if Raoul provides you with personal advice.

## Joshua Davidson

### Authorised Representative

No. 1271014

Mobile: 0402 287 081

Email: [josh@prioritylife.com.au](mailto:josh@prioritylife.com.au)



## What experience does your Adviser have?

Joshua is an Associate Adviser at Priority Life and has worked within our firm for 5 years. He has a Bachelor of Business from Monash University and a Diploma in Financial Planning. He has strong expertise in technical research and analytics and can skillfully navigate through a variety of policy differences to deliver suitable insurance options for our clients. Approachable and understanding, Joshua listens to his clients and makes them feel comfortable.

## What qualifications and professional memberships does your adviser have?

Joshua holds a Bachelor of Business from Monash University and a Diploma in Financial Planning. Joshua is also a member of the Association of Financial Advisers.

## Does your Adviser have any associations or relationships?

Joshua receives a salary as an employee of David Davidson Financial Service, T/A Priority Life. Joshua could also receive a performance bonus which may be based on certain performance criteria, such as the revenue Joshua generates for David Davidson Financial Service, T/A Priority Life, as well as several factors including successful audit results, meeting KPI's for client servicing and reviews. His bonus potential does not influence his advice, or any recommendations made.

## What areas is your Adviser authorised to provide advice on?

Joshua is authorised by Bombora to provide general and personal advice and deal in financial products and financial services, including advice or services in the following areas:

- Life investment and life risk products;
- Superannuation products

## Are there any services your Adviser is not authorised to provide?

Joshua is not authorised by Bombora to provide advice or services in the following areas:

- Deposit products;
- Government debentures, stocks or bonds;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Derivatives;
- Consumer credit advice and assistance;
- Strategic advice about consumer credit and consumer credit referrals;
- Retirement savings account products;
- Securities (e.g. shares);
- Self-Managed Super Funds; and
- Finance broking

Please ask Joshua if you would like a referral for these services. If Joshua receives a specific fee for this referral, it is disclosed below in 'Fees and Charges'. It may also be disclosed in an advice document such as a Statement of Advice ('SoA'), if Joshua provides you with personal advice.

## Privacy Statement

In addition to the information provided in the Bombora FSG Part 1 on how we collect, hold, use and disclose your personal information, and how we manage this information, further details around privacy are available at: [www.prioritylife.com.au](http://www.prioritylife.com.au) and/or by calling us on 1300 122 436.

## SECTION 3 FEES AND CHARGES

### How will your Adviser be paid for services provided?

**All fees and commissions disclosed in this FSG which are attributed to the services provided to you by us are paid to Bombora.**

Bombora receives all fees and commissions payable for the services provided and pays 100% of all the fees and commissions it receives to David Davidson Financial Service, T/A Priority Life.

### What is your Advice fee structure?

As part of our advice process, there may be costs to you at various stages of the process. Before making any recommendations, your adviser will discuss any such fees and agree on these with you.

Commissions are payable to David Davidson Financial Service, T/A Priority Life, based on the premiums you pay, the commissions are not an additional fee to you. David Davidson Financial Service, T/A Priority Life, will not charge you a fee for researching and preparing your customised personal plan, nor will we charge a fee for implementing our recommendation.

**Claims Management Fee:** For existing clients, there is no fee for the advice, care and attention for our work related to managing standard claims. In exceptional cases, we may request from you an additional fee to handle complex or contested claims. This fee may be on a success basis of 5-10% of proceeds paid plus GST. This fee will be agreed with you at the time of claim.

**Note:** Full details of all fees and commissions for financial services will be provided to you in a Statement of Advice (SoA) or Record of Advice (RoA) and Product Disclosure Statements (PDS) at the time of receiving any recommendation.

### What other benefits does your Adviser receive?

In addition to the remuneration detailed above, our Advisers are eligible to qualify for other benefits and entitlements as detailed below:

From time to time, our advisers may accept alternative forms of remuneration from product providers or other parties (up to a value of \$300), such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences) and other benefits that relate to information technology software support provided by a product issuer or that relate to educational and training purposes. A copy of the register is available on request for a small charge.

### Will your Adviser be paid when making a referral?

We may receive a payment for making a referral to an external specialist such as an accountant, mortgage broker or solicitor. Any amount payable will be disclosed in the SoA provided to you. This will be paid by the external specialist and will be at no additional cost to you.

If you have been referred to us by an external party and you accept the services provided, we may make a payment to the external party for that referral. Any amount payable will be disclosed in the SoA provided to you. This will be paid by us to the external party and will be at no additional cost to you.

**bombora**

**Bombora Advice Pty Ltd**  
ABN 40 156 250 565, Australian Financial Services Licence 439065  
Level 2, 406 Collins Street, Melbourne VIC 3000