

# FINANCIAL SERVICES GUIDE

Date: 1 August 2024



**bombora**

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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 5, 600 Bourke 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 offers
- The process we follow to provide financial services
- How we, our associates, and Bombora are paid
- Any arrangements that 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 provide the highest levels of professional advice to their clients in a business relationship that 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 (ASIC) and is a Professional Partner of the Financial Advice Association Australia (FAAA). As a member of this body, 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 that 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.

### Not Independent

As Bombora receives commissions from life risk insurance products held by our clients, we are not able to refer to ourselves or our advice as 'independent', 'impartial' or 'unbiased'.

### Bombora Advice Pty Ltd Registered Office:

Level 5, 600 Bourke Street  
Melbourne VIC 3000

Ph: 1300 653 097

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

### Bombora Advice Pty Ltd Corporate Office is:

43 Railway Road  
Blackburn VIC 3130

Ph: 1300 653 097

E: [info@bomboraadvice.com.au](mailto: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 can provide financial product advice and 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 can access through Bombora include:**

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

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 can 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 who provide 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 the 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 you 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 for 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. You should 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, which will be documented in an Ongoing Advice Service Agreement and/or SoA. Where you have entered into this agreement, we may renew it with you every year.

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 an 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 and/or our advice has not significantly changed, we will provide you with an RoA.

In the event your circumstances have changed and/or our advice is significantly different from our previous advice, we will provide you with a new SoA.

## How can you instruct us?

You may specify how you would like to give us instructions, for example, by phone 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

### 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.

All fees and commissions are paid to Bombora who may in turn pay 100% of those fees and commissions to the Corporate Authorised Representative.

Details of any fees, commission or other benefits that we, Bombora or other associated persons are entitled to receive, 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?

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 will be based on the value of the 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.

### Insurance 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 60% (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)
From 1 January 2020	0 - 60%	0 - 20%

If your policy commenced prior to 1 January 2018, Bombora may receive ongoing commission rates of up to 38.5% (excl. GST) from the product issuer if:

- Your policy was issued before 1 January 2018 and you exercise an option or apply for 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**

From 1 January 2020, 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 \$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. 1 January 2021). These commissions may be passed to us.

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

#### **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 a fee is debited from your investments, it is normally referred to as an 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.

**Note:** 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 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.

#### **Insurance Partner Program**

As part of the Insurance Partner Program, Bombora may receive benefits 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. The total amount of fees, or the fees that may be paid by each life insurance product provider, will depend on 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.

#### **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 is collected monthly from your Adviser.

#### **Other benefits**

From time to time, we may accept alternative forms of remuneration from product providers or other parties. These benefits may include hospitality or support connected with our professional development, such as training or sponsorship to attend conferences.

We maintain a register detailing any benefit valued between \$100 and \$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.

#### **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 or we may refer you to another provider who can advise on the relevant product.

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. 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 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 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 that 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 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
- Further details on how we collect, hold, use and disclose your personal information.

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 may use technology to accept digital signatures on select documents. Details of our digital signature use, collection and storage of information can be found in our Privacy Policy.

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.

#### Compensation arrangements

Bombora has arrangements in place to 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.

## SECTION 3 ARE YOU SATISFIED?

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

We 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 5, 600 Bourke Street  
Melbourne VIC 3000

**Email:**

info@bomboraadvice.com.au

**Phone:**

1300 653 097

We will review your concerns and provide a full written response within 30 days of receipt of your complaint unless the matter is complex or circumstances beyond our control delay our review of your complaint. If this occurs, we will notify you within 30 days of the reason for the delay and provide you the option to escalate the matter to Australian Financial Complaints Authority (AFCA) if you are dissatisfied.

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 at no cost to you. You may contact AFCA by:

**Writing:**

Australian Financial Complaints Authority  
GPO Box 3  
Melbourne VIC 3001

**Email:**

info@afca.org.au

**Website:**

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 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

**Phone:**

1300 300 630

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

In accordance with their by-laws, the FAAA 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 FAAA and you have a complaint in relation to the service you received, you may contact the FAAA by:

**Writing:**

Professional Accountability Manager  
Financial Advice Association of Australia Ltd  
GPO Box 4275  
Sydney NSW 2001

**Email:**

professional.standards@faaa.au

**Website:**

https://faaa.au

**Phone**

1300 337 301

Before you send your concern to the FAAA, please contact them first to understand the process of lodging your concern with them.

The logo for Bombora, featuring the word "bombora" in a dark blue, lowercase, sans-serif font. The letter "o" is stylized with a white crescent shape inside it.

**bombora**

**Bombora Advice Pty Ltd**

ABN 40 156 250 565, Australian Financial Services Licence 439065  
Level 5, 600 Bourke Street, Melbourne VIC 3000

# FINANCIAL SERVICES GUIDE

Part 2 (Adviser Profile)

Date: 01 August 2024



**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) and should be read together with Part 1 dated 01 August 2024.

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 5, 600 Bourke 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 Matthew Gates ASIC No. 235260

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

#### Office contact details:

**Street Address:** 26 Juliette Street  
Annerley QLD 4103

**Postal Address:** PO Box 503  
Carina QLD 4152

**Phone:** 1300 784 581

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

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

#### Privacy Statement

In addition to the information provided in the Bombora Advice 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 by calling us on 1300 784 581.

## SECTION 2

### SERVICES OUR ADVISERS PROVIDE

#### Matthew Gates

**Authorised Representative No.** 235260

**Mobile:** 0432 125 571

**Email:** mgates@brightkey.com.au

#### What experience does your adviser have?

Matthew Gates has over 20 years' experience in the financial services industry, providing strategic advice in personal insurance, business insurance and superannuation to individual and business professionals.

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

Matthew holds a Graduate Diploma of Financial Planning (GradDipFinPlan), Diploma (DFP) and Advanced Diploma (ADFP) of Financial Planning. Matthew also has a degree in Health Science and the designation of Associate Charter Financial Practitioner (AChFP).

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

Matthew has an association with Brightkey Pty Ltd as a director and employee. Fees and commissions are paid to Brightkey Pty Ltd by Bombora. Brightkey Pty Ltd is also a Corporate Authorised Representative of Bombora and is not a related company of Bombora. Brightkey' Authorised Representative number is 285374.

Matthew receives a salary as an employee of Brightkey Pty Ltd. As a director of Brightkey Pty Ltd, Matthew could also receive a profit share.

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

Matthew 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
- Government debentures, stocks or bonds
- Superannuation
- Deposit & Payment Products – Non-basic Deposit Products
- Managed investment schemes including investor directed portfolio services
- Retirement savings account products
- Securities (e.g. shares)
- Superannuation

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

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

- Standard margin lending facilities
- Derivatives
- Consumer credit advice and assistance
- Strategic advice about consumer credit and consumer credit referrals
- Finance broking

Please ask Matthew if you would like a referral for these services. If Matthew 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 Matthew provides you with personal advice.

## 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 Brightkey Pty Ltd are paid to Bombora.**

Bombora pays 100% of those fees and commissions to Brightkey. Brightkey is charged a monthly Licensee Fee by Bombora which is a combination of flat fees plus a percentage of revenue.

What is your Adviser's fee structure?

While commissions payable to Brightkey Pty Ltd are based on the insurance premiums you pay, the commissions are not an additional fee to you.

Brightkey Pty Ltd may charge an agreed fee for the following services:

- Researching, preparing and presenting your customised personal plan
- Implementing our recommendations or assisting you at claim time.

This fee is calculated on an hourly rate of \$250+GST and can range from a minimum of \$1,000+GST to \$20,000+GST.

The advice fee payable is waived if there is progress to implementation and attainment of recommended or altered policies. However, if these policies are subsequently cancelled within the first 2 years from inception, the agreed fee will be payable as commissions earned are clawed back by the insurer.

**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, we 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). We maintain a register detailing any benefit that we receive 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 received 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**

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