



# Financial Services Guide

**This Financial Services Guide (FSG) sets out the services that we can offer you. It is designed to assist you in deciding whether to use any of those services.**

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**FOR INVESTORS, SOCIETY AND THE ENVIRONMENT**

(E) [louise@ethicalinvestment.com.au](mailto:louise@ethicalinvestment.com.au)  
LEVEL1, 1 ENOGERRA TCE  
RED HILL QLD 4059

(T) 07 3367 3332  
PO BOX 623  
PADDINGTON QLD 4064

**LOUISE EDKINS**

Costa Brava Nominees P/L Corporate Authorised Representative 267288

# ABOUT THE FSG

You have the right to ask us about our charges, the type of advice we will provide you, and what you can do if you have a complaint about our services.

This Financial Services Guide ("FSG") is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with a financial service. The matters covered by the FSG include, who we are, how we can be contacted, what services we are authorised to provide to you, how we (and any other relevant parties) are remunerated, details of any potential conflicts of interest, and details of our internal and external dispute resolution procedures, along with how you can access them.

It is intended that this FSG should assist you in determining whether to use any of the services described in this document.

When we provide you with initial advice regarding an issue, or further advice where your circumstances, objectives or needs or the basis of the advice we are providing you is significantly different to when we provided you earlier advice, you may be entitled to receive a Statement of Advice. The Statement of Advice will contain the advice, the basis on which it is given and information about fees, commissions and associations which may have influenced the provision of the advice.

If we provide you with further advice where your circumstances, objectives or needs or the basis of advice we are providing is not significantly different to when we provided you with earlier advice, we do not provide the advice in writing at the time, you may request a copy of record of that advice. A copy is available at any time up to 7 years from the date our representative gave the advice to you. Further advice may be given by our representative if your personal circumstances have not significantly changed, and that further advice is related to the advice we provided to you in a previous Statement of Advice.

You can request the record of the advice by contacting the representative or us in writing or by telephone or by email.

In the event we make a recommendation to acquire a particular financial product (other than securities or financial products that are listed on a financial market), we may also provide you with a Product Disclosure Statement containing information about the particular product, which should help you to make an informed decision in relation to the acquisition of that product.

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# BEFORE YOU RECEIVE OUR ADVICE

Before we provide any official advice to you, we would like to make sure that you're comfortable with the following details.

## Lack of Independence

While we always seek to meet our legal obligations of section 961B of Corporations Act 2001, we do not fall within the definition of independent, unbiased or impartial under Section 923A.

This is because we give our clients the option of allowing insurance companies to pay us a commission for services we provide rather than invoice our clients. We remain committed to continue to give our clients this important choice.

We have created ethical investment products under a wholly owned entity Ethical Advisers Funds Management. These were created to suit the needs and ethics of our clients. In most circumstances we rebate any Investment management fees we earn for our clients, however there may be times when it suits clients to be charged these fees In lieu of Invoiced fees.

## Who will be providing the financial service to me?

**Ethical Investment Advisers Pty Ltd**

**ABN: 26 108 175 819**

**Australian Financial Services Licence Number: 276544**

Ethical Investment Advisers has been established by financial advisers who have been working in the financial services industry for more than 20 years, providing a range of wealth advice and assistance to help people grow, manage and protect their wealth.

Costa Brava Nominees is a Corporate Authorised Representative of Ethical Investment Advisers. Costa Brava Nominees Corporate Authorised Representative number issued by the Australian Securities and Investments Commission (ASIC) is 267288.

**Location:** Terrace House,  
Level 1, 1 Enogerra Tce RED HILL QLD  
4059

**Tel No:** 07 3367 3332

**Postal Address:** P O Box 623,  
PADDINGTON QLD 4064



**Email:** [louise@ethicalinvestment.com.au](mailto:louise@ethicalinvestment.com.au)

## Who is my adviser?

Your adviser will be Louise Edkins who is authorised to act on behalf of the Authorised Representative and the Licensee.

Her qualifications are:

- Diploma of Financial Planning I to VIII (Financial Planning Association, 2000)



- Member & Past Board Member of the Responsible Investment Association of Australasia

Her Representative Number is 267287

**Do any relationships or associations exist which might influence you in providing me with the financial services?**

Louise Edkins is on the investment committee for the Ethical Advisers Funds Management Ethical SMA funds. Ethical Investment Advisers owns Ethical Advisers Funds Management. Louise Edkins is not paid for her investment committee position and does not receive any remuneration from recommending these investments.

**What kinds of financial services are you authorised to provide me, and what kinds of products do those services relate to?**

Costa Brava Nominees and Louise Edkins are authorised by Ethical Investment Advisers to offer the following:

- Wealth Creation
- Investment Management
- Strategy Review
- Financial Planning Strategies
- Retirement Planning
- Self Managed Superannuation Funds
- Superannuation Needs & Administration
- Direct Shares
- Margin Lending

**Disclosure:** Ethical Investment Advisers (AFSL 276544) has been certified by RIAA according to the strict disclosure practices required under the Responsible Investment Certification Program. See [www.responsibleinvestment.org](http://www.responsibleinvestment.org) for details.



As an Authorised Representative of Ethical Investment Advisers Pty Ltd, **Louise Edkins** can provide advice on and deal in the following products:

- Deposit Products
- Government Debentures, Stocks & Bonds;
- Managed Investment Schemes;
- Superannuation;
- Securities;
- Standard Margin Lending; and
- Retirement Savings Account Products;

We can advise you in respect of Securities and provide a service to buy or sell Securities. The cost of the purchase or sale of direct investments such as shares in listed companies or units in listed property trusts will be passed on to you. Current fees range from 0.55% to 1.10% of the value of the trade (usually subject to a minimum fee) and are payable to the relevant stockbroker.

**Investment Review:** Records are maintained detailing client's investments that were recommended by Ethical Investment Advisers. Investments are reviewed on a quarterly, semi annual or annual basis, subject to the client's discretion.

The fees for this service range from 0.8% to 1.2% per annum (incl GST) of funds under management with us, subject to a minimum fee of \$1,100 per annum. Our fees are charged on a monthly basis. For example, if your account balance was \$350,000 and we



charged 0.88% for portfolio reviews, we would receive \$3,080 per annum. In some cases, this fee may be capped, depending on the value of funds under management and the complexity of the work involved

**Who do you act for when you provide financial services for me?**

Ethical Investment Advisers is responsible for the financial services provided to you.

**How will I pay for the service?**

Costa Brava Nominees operates on a fee-for-service basis. We typically charge an hourly rate of \$275 per hour (incl GST). We charge a minimum fee of \$1,100.

All fees will be outlined to you in our letter of engagement and your written consent will be obtained before proceeding. No fees are payable unless you engage our services by signing the letter of engagement.

**Do you receive remuneration, commission, fees or other benefits in relation to your provision of financial services and how is that commission calculated?**

1. Ethical Investment Advisers receives 100% of the fees and commissions and pays Costa Brava Nominees those fees. Louise receives an income distribution from the Trust.
2. Louise is a director and shareholder of Ethical Investment Advisers Pty Ltd and may receive dividends/distributions from this entity.
3. Louise does not receive a bonus from the licensee based on income generated.
4. If you have been referred to us by another party neither Ethical Investment Advisers, nor Louise Edkins pay a fee to that party.
5. The exact amounts of any fees received by Louise and the licensee will be disclosed at the time advice is provided to you.
6. Ethical Investment Advisers may also receive additional remuneration as a Model Manager Fee calculated on the aggregated amount of funds it has placed within the Ethical Investment Mid Cap, Ethical Investment Large Cap, Ethical Investment Growth and Ethical Investment Income SMA in HUB24, and Praemium. This fee will be disclosed to you at the time advice is provided to you.



# WHEN YOU RECEIVE OUR ADVICE

## **Will you provide me advice, which is suitable to my needs and financial circumstances?**

Yes. When you have requested 'personal advice'. Where 'general advice' is provided, it may not be suitable to your personal needs or financial circumstances. Where 'personal advice' is provided, we need to find out your individual objectives, financial situation and needs before we recommend any financial products or services to you.

You have the right not to divulge this information to us, if you do not wish to do so.

In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully

## **What should I know about the risks of the financial products or strategies you recommend to me?**

We will explain to you any significant risks of financial products and strategies, which we recommend to you. If we do not do so, you should ask us to explain those risks to you

## **What information do you maintain in my file and can I examine my file?**

We maintain a record of the information that you have provided us which may include your personal profile, which includes details of your objectives, financial situation and needs. We also maintain records of any recommendations made to you.

We are committed to implementing and promoting a privacy policy, which will seek to ensure the privacy and security of your personal information. A copy of our privacy policy is enclosed for your information. Our website provides a detailed link to our Privacy Collection Statement.

If you wish to examine your file, we ask that you make a request in writing and allow up to fourteen (14) working days for the information to be forwarded.

We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise of the likely cost in advance and can help to refine your request if required.

## **Can I provide you with instructions and tell you how I wish to instruct you to buy or sell my financial products?**

Yes. You may specify how you would like to give us instructions, however we may at our discretion require email or written confirmation of instruction.



## IF YOU HAVE ANY COMPLAINTS

Ethical Investment Advisers is a member of the Australian Financial Complaints Authority. If you have any complaint about the service provided to you, please take the following steps:

1. Contact our representative and tell him about your complaint.
2. If your complaint is not satisfactorily resolved within 3 days, please contact the Manager of Ethical Investment Advisers or put your complaint in writing and send it to P O Box 623 Paddington Qld 4064. We will seek to resolve your complaint quickly and fairly. Complaints must be resolved within 30 days.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA via their link below. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

**Australian Financial Complaints Authority Contact Details:**

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

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

<https://www.afca.org.au/make-a-complaint>

To Find out more about how the AFCA assists investors, you can view their information on the website above.

## OUR PROFESSIONAL INDEMNITY INSURANCE

Ethical Investment Advisers will take reasonable steps to ensure that we have Professional Indemnity Insurance cover that will meet the requirements of s912B Corporations Act to provide compensation to persons who successfully claim for losses suffered due to breaches of licensee obligations by representatives and staff who are or were a representative or employee of Ethical Investment Advisers at the time the advice was provided.



# ETHICAL INVESTMENT ADVISERS PTY LTD

## PRIVACY COLLECTION STATEMENT

**The privacy of your personal information is important to us.**

### **1. Your adviser will ask you many questions. Why is so much information required?**

We collect your personal information to enable us to provide you with the products and services that are appropriate to your needs. Under certain legislation, including but not limited to the following, we may be authorised or required to collect your personal information:

- Corporations Act 2001,
- Australian Securities and Investment Commissions Act 2001,
- Anti Money Laundering and Counter Terrorism Financing Act,
- Taxation Administration Act 1953,
- Superannuation Guarantee (Administration) Act 1992 and
- Superannuation (Unclaimed Money and lost members) Act 1999

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

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

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

### **2. Access and correction**

You may (subject to permitted exceptions) access and update your information by contacting us. You may access the personal information we retain and request corrections. This right of access is subject to some exceptions allowed by law.

We will give you reasons if we deny access though will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependent to a large degree on the information you provide and you should advise us if there are any errors in your personal information.



### **3. Providing personal information**

We may provide personal information to:

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

### **4. Overseas disclosure**

We may transfer information to our related or associated entities or external service providers in locations outside of Australia, which may include but not be limited to, India, United States, China, the European Union or the Philippines, in the course of storing that information and when using or disclosing it for one of the purposes referred to above. When transferring information to foreign jurisdictions, we will ensure that we satisfy the following:

- we will take reasonable steps to ensure the overseas recipient does not breach the APPs in relation to the information;
- we form a reasonable belief that the overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the APP protect the information and there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme; or
- we will seek your informed consent prior to disclosing your information overseas. Most of the services that we provide are based on an integrated model of professional and reliable service providers that we have selected after thorough due diligence. If you do not agree to us disclosing your information outside Australia to our external service providers, we will not be able to provide services to you.

### **5. Identifiers**

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

### **6. Dealing with us anonymously or using a pseudonym**

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



transaction is being completed. However, in some instances we may be able to provide information or a service anonymously or to you under a pseudonym, for example, enquiries about products from a potential client.

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

## **7. Marketing Practices**

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

## **8. Sensitive Information**

We may also need to collect sensitive information if we organise insurance covers for you. Sensitive information includes health information, racial information and genetic information.

We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising you, acting for you and dealing with you

## **9. Privacy Complaints**

If you believe your privacy has been breached or you have a privacy complaint, you should write to us by email at [compliance@ethicalinvestment.com.au](mailto:compliance@ethicalinvestment.com.au) or to the Privacy Officer at PO Box 623 Paddington QLD 4064.

If Ethical Investment Advisers Pty Ltd does not satisfactorily address your complaint you can escalate it to the Office of Australian Information Commissioner.

## **10. Our Privacy Policy**

We have a more detailed Privacy Policy if you require more information please ask.