



SENTINEL  
FINANCIAL GROUP

Sentinel Financial Group Pty Ltd ABN 26 104 456 288 ASFL 230542

## FINANCIAL SERVICES GUIDE



SENTINEL  
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This is a guide to the financial services that Sentinel Financial Group is authorised to provide under an Australian Financial Services Licence (AFSL) and includes the range of financial products to which our services typically relate. Accordingly, it is an important document and should be read and then kept with your financial records.

Make sure that you ask for clarification of any point in this Financial Services Guide (FSG) which is not clear. Please feel free to ask for more information about any point.

The purpose of this FSG is explained on the following page. Its contents are as follows:

- A. **Who is Sentinel?**
- B. **Who will be providing the services to you?**
- C. **What financial services does Sentinel Financial Group provide and to what financial products do they relate?**
  - Dealing Services
    - How to instruct us to buy, sell or apply for financial products.
  - Advisory Services
    - Product specific advice (General Advice)
    - Advice appropriate in light of your personal circumstances (Personal Advice)
  - How to address Investment Risk
- D. **If I use Sentinel Financial Group's services, what fees, commission or any other benefits will be payable to Sentinel Financial Group or received by our directors, employees, related bodies corporate or any associate?**
- E. **What associations or relationships are there between Sentinel Financial Group, or any related bodies corporate, and issuers of financial products which might reasonably be expected to be capable of influencing us in providing any of our financial services? Does Sentinel Financial Group act under a binder in providing any financial services?**
- F. **Does Sentinel Financial Group have complaint resolution procedures?**
- G. **Is the Personal Information I provide to Sentinel Financial Group private and confidential?**

This Financial Services Guide is dated 21st March 2023, Version 5.0

## IMPORTANT INFORMATION

### What is the purpose of this Financial Services Guide?

This Financial Services Guide (FSG) is designed to assist you in deciding whether to use any of the services offered in this Guide. It contains information about the range of financial services we are authorised to provide. Those financial services, and the financial product, covered by these services, are complex and subject to special regulatory requirements. Our aim has been to provide sufficient information in relation to the range of our services. Dealings in certain financial products will require us to provide you with prescribed information about that product. Should you wish to discuss in more depth the detail of 'mechanics' of particular services, please contact us. It contains information about remuneration that may be paid to Sentinel Financial Group and other relevant parties in relation to the services offered. Importantly, it also contains information on what to do if ever you have a complaint and how your complaint would be dealt with.

If you choose to use our financial services you may receive a Statement of Advice and/or a Product Disclosure Statement.

#### Statements of Advice (SoA)

Statements of Advice present or confirm recommendations which we believe are appropriate for you personally. They include detail of the advice, the basis for the advice, relevant disclosures and any applicable warning. They are only relevant in the context of personalised advice, not product-only advice (i.e. general advice). However, you will not always receive a SoA as a consequence of personal advice.

There is a sub-category of personal advice called 'Further Advice' which will not usually result in a SoA being given to you. Instead, you will be given a verbal statement at the same time as the Further Advice of certain information that would have appeared in a SoA, and if you want to you can request (within the next 7 years) a written record of that Further Advice.

For personal advice other than Further Advice, unless you expressly instruct us that the advice is time-critical and, as a consequence, must be executed immediately or by a specified time, the SoA will be provided to you before the advice can be put into effect. In the non-Further Advice time-critical scenario, a verbal statement of certain information that will appear in the SoA will be given to you at the same time as the advice, and the SoA will then follow within 5 days. When investing or trading in 'live' markets such as ASX's equities and derivatives markets, it is in your interests to instruct us that the personal advice is time-critical.

#### Product Disclosure Statements (PDS)

When required, these accompany personal advice about a financial product, or accompany the issue or sale of an unquoted financial product. A PDS is a very important document in that it sets out all the necessary information you may require about the product to make an informed investment decision about the particular financial product. In the case of ASX Market traded derivatives, a PDS may accompany the Explanatory Booklet prescribed by ASX for that derivative product. A PDS will not accompany personal advice on quoted securities. Issues or sales of unquoted securities are accompanied by a Disclosure Document (e.g. a prospectus), which serves the same purpose.

#### Not Independent

Sentinel are specialist investment managers that operate exclusively via the stockmarket.

It is standard practice in the stockmarket to calculate brokerage charges based on a percentage of the value of funds transacted and Sentinel also adopts this same practice.

As Sentinel is remunerated by receiving a portion of your brokerage charge (known as a 'commission'), we are deemed not to be independent.

Sentinel has rigid procedures in place to manage any potential conflict of interest and to ensure your best interests are placed above all else.

## A. Who is Sentinel?

### Sentinel Financial Group

The Sentinel Financial Group encompasses a range of financial services businesses trading under the 'Sentinel' banner.

Sentinel offers a complete range of investment management and financial services over Australian listed securities and derivatives.

As a holder of an Australian Financial Services License (No 230 542), we are able to provide an array of advisory, wealth management, corporate and transactional services.

We are able to assist everyone from first time investors to financial professionals, with a strong focus on flexibility and innovation. Whatever your stockmarket requirements, Sentinel will be able to assist you in a friendly, professional manner.

## B. Who will be providing the services to you?

Your primary point of contact will be your Investment Advisor who is a representative of Sentinel Financial Group. For matters relating to financial services, your Advisor will be acting on behalf of Sentinel Financial Group. It is Sentinel Financial Group that is therefore ultimately responsible to you for any advisory or dealing services your Advisor provides.

Sentinel Financial Group and its associated financial services businesses have in place Professional Indemnity Insurance which meets the standards set out by the government in regards to retail compensation arrangements. This Insurance includes coverage for claims in relation to representatives and employees who no longer work for Sentinel but did so at the time of relevant conduct.

## C. What financial services does Sentinel Financial Group provide and to which financial products do they relate?

### General Overview

Sentinel provides a wide range of stockmarket investment and financial services. These include:

- Transactions (so that you can buy and sell on the stockmarket)
- Advice (to help you decide on your investment actions whether to buy, sell, hold)
- Research (with information, data and analysis to help your investment decisions)
- Technology (such as our online investment portal to manage your investments)
- Reporting & Administration (so that you can review your performance and create taxation summaries)
- Combinations of the above to form packaged services (such as our flagship "Sentinel Select" service)

### Licensing

Our Australian Financial Services License (AFSL 230542) authorises us to provide advice on and to deal in the following:

- Securities (for example, shares, exchange traded funds and listed investment companies)
- Derivatives (for example, options and warrants)
- Interests in managed investment schemes excluding investor directed portfolio services (for example, listed or unlisted managed funds)
- Managed Discretionary Accounts (MDAs)
- Basic deposit products (for example, cash management accounts)

These services may be provided to both retail and wholesale clients.

### It is important to be aware of what our services DO NOT cover

Sentinel's services only relate to investments in listed financial markets. Sentinel are specialist stockmarket investment managers and do not provide any broader financial services (such as financial planning or accounting). As such, our focus is exclusively on the listed financial markets and their associated financial products. In this context, we are not able to assist with those aspects of your personal circumstances, needs and objectives outside of our particular field of expertise. For example, we cannot provide service over broader aspects such as risk profiling, taxation, insurance, cash flow management, entity structuring, borrowing and the like.

It is therefore important to note that any advice we provide relies on the key assumption that you have already consulted with your external financial advisor (such as accountant and financial planner), or conducted your own analysis, and concluded that investment in the stockmarket is appropriate for you. This includes determining your appropriate Risk Profile (asset allocation) and amount to invest in the stockmarket.

If you are unsure on any of these additional services, please ask us and we will be happy to refer you to appropriate relevant service providers outside of Sentinel.

### Sentinel Account Opening

Before using our services for the first time we require you to substantiate your identity, confirm settlement arrangements and sign a client agreement. You may also have to sign and return certain prescribed product-specific agreements (for example, an ASX Warrants Agreement).

## Account Types & Services

Sentinel provides a range of different account types to provide specific solutions to common investment needs including:

### Sentinel Select

Our flagship account type is known as "Sentinel Select".

This service assists investors to design, construct and then maintain their investment allocations across all asset classes, entirely utilising the stockmarket.

Sentinel Select works by capturing the inherent benefits of the stockmarket and its modern investment products and making them easily accessible via a centralised platform (our technology) for design, reporting and ongoing management.

A key feature of this service is the use of Exchange Traded Funds and other 'grouped investments' which create a broad diversification (spread) of investments, while maintaining an ongoing focus on quality without the need for substantial investor workload.

Advantages include:

- Secure, Direct Ownership
- Liquid
- Transparent
- Flexible
- Low Cost
- Self-managing
- No/Low Corporate Actions
- Diverse and Tailorable

Sentinel Select comes in various levels of management support depending on investor preferences including self-directed, Sentinel-assisted, financial advisor-assisted or fully managed (discretionary).

### 'Traditional' Stockbroking-Style Investment

Sentinel offers 'traditional' stockbroking-style accounts which provide clients with personal assistance over their stockmarket investments. We offer the following services in relation to stockmarket-listed securities and their derivatives:

- Transactions (purchases or sales) of securities, derivatives, or other financial products, on your behalf in accordance with your instructions.
- Advice on the timing of purchases and sales, which includes identifying opportune trading situations.
- Identifying securities, derivatives or other financial products undervalued by the market.
- Portfolio advice and reviews, and advice on particular securities and derivatives.
- Depending on your requirements, advice personalised to your objectives, situation and needs, or general advice based solely on the investment or trading merits of the particular financial products.
- Information and research on listed companies, market developments and special situations.
- Assistance with deceased estates, off-market transfers and the like.
- Advice on floats (i.e. IPOs) and new issues by listed companies. We also provide advice on unlisted managed funds. In either case, we can assist or arrange application or redemption on your behalf.

Our traditional stockbroking-style accounts come in two types:

- Standard Account – providing transactions and investment advice
- Premium Account – providing, transactions, advice and detailed reporting services.

### Discretionary Services

Sentinel is licensed to provide Managed Discretionary Account (MDA) services.

'Discretionary' means that Sentinel is able to manage and transact on your account without first seeking your approval. The advantage of this is that Sentinel takes on all the management decision workload that you would normally need to handle yourself, plus you gain the speed and agility to invest quickly in fast moving market conditions. The account also provides complete transparency over investments activity and direct/individual ownership for investor security and peace of mind.

Sentinel provides its MDA services over both Premium account types and Sentinel Select account types.

The Premium discretionary account type is branded as a "Sentinel Managed Portfolio" and is actively managed (traded frequently) by Sentinel with a focus predominantly on Australian holdings.

The Sentinel Select discretionary account type is branded as "Sentinel Select Managed Portfolio" and is passively managed (traded infrequently) by Sentinel and focuses on full asset allocation utilising Exchange Traded Funds.

For full details on our discretionary account services, please see our specific Supplementary Financial Services Guide for MDA Services.

## General Information and Guidelines On Our Stockmarket Services

There are many specific terms, guidelines and procedures associated with regulated environments such as the stockmarket and we have summarised the key matters below for your information:

### Dealing Services

#### **Secondary Markets** (investments already listed and trading on the stockmarket)

Sentinel has rapid access when the market is open to the order execution systems for equities and derivatives. Subject to the relevant dealing and settlement regulations, Sentinel can transact your orders and facilitate settlement (via our relationship with specialist providers) in relation to market quoted products in accordance with your instructions. It should be noted that there may be rare circumstances where restrictions on orders exist and we cannot fulfil your instructions. Where we are unable to execute your order for some reason, we will explain the circumstance behind the restriction and endeavour to make alternative arrangements for you. The ASX also maintains discretionary powers to cancel or amend executed transactions and under these provisions, it is possible that orders confirmed to you may be annulled for reasons beyond our control. Confirmation of your market transactions, usually in the form of a "Trade Confirmation", will be dispatched to you following execution. These Trade confirmations confirm the details of the transaction and the terms and conditions applying to the transaction.

*You must instruct us in certain ways*

You may specify how you would like to give us instructions. For example, by telephone, fax or other means. As time is of the essence in 'live' markets, the telephone is the preferred means. Please note that order instructions should be given in terms of volume (i.e. number of Shares to be purchased or sold), not value (i.e. \$ amount).

#### *Best Execution Policy*

Sentinel delivers access to various licensed Australian markets through its third party Execution and Settlement providers. Accordingly, all dealing services by Sentinel will be bound by both its own Best Execution Policy, and the respective policies of each Execution and Settlement provider. These documents explain how your dealing instructions will be handled and executed, as required under the ASIC Market Integrity Rules.

#### **Primary Markets** (investments about to list and trade on the stockmarket)

Sentinel can assist with applications in response to Initial Public Offerings (IPOs), new issues or interests in managed investment schemes (e.g. listed property trusts).

### Advisory Services

**General (Product Only) Advice:** Advice which is not Personalised (i.e. Advice based on the attributes of the financial product alone without any consideration of the question of appropriateness to your financial circumstances)

You should not assume that all advice or recommendations are suitable for you personally. The process of profiling your financial circumstances is not relevant in relation to General Advice (e.g. research reports or newsletters, but it may also be verbal), which is based solely on the investment or trading merits of the securities or other financial products in question, prepared without consideration of the investment needs and financial circumstances of any particular client. General Advice will be accompanied by the warning that the advice is not a recommendation that a particular transaction in those financial products is personally appropriate or suitable for any particular person. In these circumstances, you will need to assess whether acting on the advice is appropriate in light of your financial circumstances.

**Personal Advice** (i.e. Advice which recommends certain financial products as appropriate for you based on consideration of your personal financial circumstances)

If you ask your Advisor for advice about whether a particular security or investment is suitable for you, he or she is obliged to consider your best interests for such a personalised recommendation. To ensure this is the case, your Advisor needs to consider your investment objectives, financial situation and particular needs (i.e. your financial circumstances).

We will therefore request that you provide us with accurate information so that we can provide advice that is in your best interests. Once received we will incorporate your information into a single confirmation document known as a "Statement of Advice". This is an important document as it clearly sets out the guidelines upon which we will provide you with advice. Once you verify that your Statement of Advice - Record of Relevant Circumstances is appropriate for you, unless otherwise advised, our advice will not exceed the parameters as set out in this document.

It is also important that you update us regarding any changes to your circumstances that may be relevant when recommendations are given in future. You have the right not to divulge some or all of this information to us if you do not wish to do so, but your Advisor will be limited in his or her ability to make recommendations specific to your requirements. It may mean that recommendations made to you are not entirely appropriate to your needs and objectives. If you decline to provide sufficient information we are required to warn you about the possible consequences of not doing so (i.e. the Personal Advice is based on personal information provided by you which is incomplete or inaccurate). You should consider these warnings carefully. Unless the Personal Advice we provide is Further Advice, it will be presented or confirmed in an individual Statement of Advice (SoA).

## Further Advice

Further Advice ("FA") is a sub-category of Personal Advice. When we first provide Personal Advice to you, we would usually be required to issue you with a SoA including detail of your financial circumstances on which that advice and further advice of that type will be based. Thereafter, for further episodes of Advice (i.e. FA), we are not required to provide an SoA to you unless there is a significant change in your personal circumstances relevant to the advice, or in the basis of the advice (i.e. the strategy being pursued or the product involved). However, you may request a record of the FA and related information from your Advisor within 7 years of the Further Advice being provided, or such other longer period specified by regulation.

## What are the limitations of advice, research, newsletters and other information Sentinel Financial Group provides about financial products?

The research undertaken by investment managers, such as Sentinel Financial Group is basically the opinion of specialist analysts or Advisors. It can never be guaranteed. It may only be valid for a limited time and is often subject to market movements. For example, a 'buy' recommendation for a short term investor could turn into a 'sell' recommendation where the market price of a security appreciated by a small amount. For a longer term investor, this market movement may not be significant, although a larger movement might be.

The mere fact that a security is recommended in a research report or a newsletter as a 'buy', 'sell', 'hold' or 'accumulate' does not necessarily mean that the particular advice is appropriate for you specifically and you should consult your Advisor before acting on any research report or newsletter.

## How to address Investment Risk

What should I know about risks associated with the investments or investment strategies you recommend to me?

We will explain any significant risks associated with investments and strategies which we recommend to you. If we do not do so, you should ask us to explain them.

Shares and other equity securities or derivatives, in common with all other asset classes (e.g. real property and government bonds), can decline in value as well as appreciate. The measure of this change in value is often referred to as volatility. The more the value varies over time, the more volatile the asset is and therefore the more risk involved in investing in it. On the other hand the less volatile an asset is, the less likelihood there is for any significant capital gain or loss from investing in that asset.

Equity securities and their derivatives are generally more volatile than other asset classes. However the markets for other asset classes are not as efficient or transparent as ASX 'live' markets in terms of the information available to investors and the process for continuously determining and making public the real market value of the particular asset. For this reason the real volatility of those other 'unlisted' assets is often not fully appreciated.

In general, the main risks associated with investing or trading in equities can be categorised in the following manner. Other categories of risk may also be relevant to you. Please note that the lists of examples in each category are not exhaustive, as it is not feasible to list all the possible risks in each category:

*Overall Market Risk* - This is the risk of loss by reason of movements in the stock market (eg. each ASX operated market) generally. These can be caused by any number of factors including political, economic, taxation or legislative factors. Specific examples are changes in interest rates, changes of government, changes in taxation or superannuation laws, international crises or natural disasters.

*Domestic versus International Risk Factors* - The vulnerability of the listed company to international events or other factors affecting the markets for its products or services, influences the value of its securities. These would include movements in exchange rates, changes in trade or tariff policies and changes in other stock or bond markets.

*Sector Specific Risk Factors* - These would include falling demand for the product the listed company produces, weakening commodity prices, the economic cycle of industry, changes in consumer behaviour, lifestyle changes and changes in technology.

*Stock Specific (The Particular Financial Product Being Considered) Risk Factors* - These would include the 'quality' of the listed company's directors, the strength of the company's management and the significance of any key personnel, the company's profit history, the company's tangible asset base, debt level and fixed cost structure, litigation, profits or losses on particular contracts, drill results, competition from within the sector, and whether the company already has a profitable business or whether it is exploring for recoverable resources or is developing a new product.

## Time Horizon

The period of time over which an investor seeks returns on their investment is referred to as the time horizon. Investors with short time horizons (three months or less) are usually known as traders (i.e. they buy and sell securities with a view to benefit from short-term price movements). Short time horizons generally involve a high level of risk and uncertainty. Investors with long time horizons (over one year) generally involve a lower level of risk and greater certainty. In very general terms, the longer an investment is held the less volatile the returns over the time horizon will usually be.



## **As an investor, how should I address 'Risk'?**

All investments have associated risks. The key to addressing these risks is understanding them and rationally modifying your investment (and/or trading) strategy accordingly. Understand what could happen to your investments if things go wrong. Two age-old rules should be kept in mind. "Don't put all your eggs in one basket" (i.e. diversify by investing in companies in different sectors, and by doing so, spread rather than concentrating your risk) and "Don't over-extend yourself" (i.e. don't over-gear yourself financially, don't be too greedy).

You should have a long term outlook, accepting that you will make losses as well as profits, with the latter outweighing the former given your particular investment strategy. In considering your "Attitude to Risk", ask yourself "Can I afford to lose money on the way to reaching my financial goals and, if so, how much would be sustainable in relation to each transaction/investment holding"? Remember that the market price may move against you, but a loss is only crystallised when you actually sell. Therefore, it is better to be in a position of selling when you want to rather than when you have to.

In broad terms, what are the alternative investment strategies available to me?

*Income* - You need an income stream, perhaps to meet your living expenses. You may also tend to avoid securities or other financial products which do not pay franked dividends or other forms of tax effective distributions.

*Growth* - A secure income stream is not necessary, as your income needs are met from other sources. However, you wish to achieve capital growth to provide a hedge against inflation, to accumulate wealth and/or to defer taxation. Securities which are likely to provide capital growth can also result in capital losses and in fact the securities with the greatest potential for growth may also have the greatest potential for loss in value.

*Mix of Growth and Income* - Your needs may include both an income stream and some measure of capital growth.

*Short Term Trading* - You wish to trade in shares or related derivatives with a view to profiting from short term price movements in the stock market.

## **Asset Classes**

All asset classes can be accessed through the Australian stockmarket using modern investment products such as Exchange Traded Funds (ETFs) or Listed Investment Companies or Trusts. Broadly speaking, these asset classes have different financial payoffs in terms of risk and reward as outlined below:

- Domestic (Australian) Companies – growth orientated with generally higher risk and reward
- International Companies – growth orientated with generally higher risk and reward
- Property & Infrastructure – growth orientated with generally more moderate risk and reward
- Fixed/Floating Income – defense orientated with generally lower risk and reward
- Cash – defense orientated with generally very low risk and reward
- Alternative Assets – blend of risk and reward depending on specific individual investment

- D. If I use Sentinel Financial Group's services, what fees, commission or any other benefits will be payable to Sentinel Financial Group or received by our directors, employees, related bodies corporate or any associate?

How will I pay for the services?

Sentinel has three broad types of charges, which are applied differently depending on the service provided:

*Brokerage* – a fee for transacting on the stockmarket, charged per incidence of buying or selling.

*Reporting & Administration* – a fee for providing reporting (such as performance calculations and tax summaries) and administration (such as managing banking activity and lodging information with share registries) over your holdings.

*Performance Fees* – a fee based on a share of your portfolio returns.

Each of Sentinel's account types has a different fee associated with it and these are summarized below:

**Sentinel Select** (including Sentinel Select Managed Portfolios – MDA)

- Brokerage 0.33% of transaction value (minimum fee of \$66)
- Reporting & Administration 0.52% per annum of portfolio value, capped at \$100 per month
- Performance Fee Nil

**Standard Account**

- Brokerage 1.1% of transaction value (minimum fee of \$110)
- Reporting & Administration Nil
- Performance Fee Nil

**Premium Account**

- Brokerage 0.33% of transaction value (minimum fee of \$66)
- Reporting & Administration \$45.84 per month
- Performance Fee Nil

**Sentinel Managed Portfolio** (Australian MDA account)

- Brokerage 0.22% of transaction value (minimum fee of \$55)
- Reporting & Administration \$45.84 per month
- Performance Fee 22% of Net Performance (refer to Supplementary FSG)

## How are the commissions, brokerage and fees calculated and charged?

### **Brokerage Charges**

Brokerage on each purchase or sale of securities or other financial products traded on ASX markets is typically calculated as, the greater of either a minimum amount or a percentage of the dollar value of the transaction. For example, if your brokerage rate was \$100 or 1.1%, then for a \$1,000 transaction, you would pay the minimum \$100 (as this is greater than the percentage rate –  $1.1\% \times \$1,000 = \$11$ ). However if the transaction was \$20,000 in value, the percentage rate would apply as it is greater than the minimum so your brokerage would be  $\$20,000 \times 1.1\% = \$220$ .

For a purchase, the brokerage, together with any applicable duty or tax, is added to the transaction value and the total is the overall consideration due. If payment in full is not received by the time and date shown on the contract note, you may be charged interest and/or an administration fee or, ultimately, the holding may be sold-out at your risk and expense. For a sale, the brokerage, together with any duty or tax payable, is deducted from your proceeds. All these amounts are specified on the Trade Confirmation sent to you confirming your purchase or sale. You may also be charged 'fail fees' if you fail to settle a sale by the time and date shown on the Trade Confirmation. Ultimately, the unsettled position may be bought-back at your risk and expense.

Where Exchange Traded Options are transacted, the ASX levies its own fee per contract on top of Sentinel's brokerage amount.

Both the minimum fee and the percentage brokerage rate may be negotiated and will be agreed with you prior to accepting your order instructions. The negotiation of brokerage will be influenced by the size of the transaction(s), the types of shares or other securities likely to be dealt in and whether you are Broker Sponsored. Brokerage arrangements may also change over time but again will be agreed on prior to the execution of any transactions.

### **Reporting & Administration Fee**

Sentinel offers various levels of Portfolio Management and Administration services which clients may elect to utilise. Sentinel charges a percentage fee of between 0% and 1.1% including GST based on the value of the portfolio being administered. Minimum portfolio sizes may apply and in some circumstances a flat fee may be charged rather than a percentage rate. Full details of these services can be obtained from your advisor.

### **Ongoing Fee Arrangements**

If Sentinel has an ongoing fee arrangement with you which exceeds 12 months, then you will receive from Sentinel a Fee Disclosure Statement annually setting out the fees you have paid to us, the services that we contracted to provide and what services we did provide to you over that period. Additionally every year we will send you a renewal notice requesting your consent for us to continue to provide services for you. We must have your consent within 150 days of that notice in order for us, by law, to continue to provide services to you.

### **Interest Charges**

Sentinel charges interest on the value of all unsettled transactions or margins owing past the relevant due date, as determined by our Settlement providers.

### **Other Charges**

We have the ability to arrange on your behalf, completion of transactions in securities other than ASX quoted securities (e.g. foreign income securities and CFDs) with organisations that specialise in the relevant securities. In these circumstances, brokerage will be negotiated with you prior to accepting your instructions.

Duties, taxes and other fees may also be payable depending on the securities involved. Our third party trade executors and clearers may levy various fees and these amounts may be passed on to clients of Sentinel Financial Group. Full details of any such fees will be disclosed in the Financial Services Guides of the relevant providers.

If you apply for securities in a new issue, privatisation or float and your application is stamped by us and is successful, Sentinel Financial Group receives a lodgement fee from the company, government or relevant issuer. This similarly applies in relation to applications for units in managed funds (e.g. Cash Management Trusts). All lodgement and other fees would be disclosed in the offer documentation (eg prospectus or product disclosure statement) for the issue.

Generally, Sentinel Financial Group does not charge separately for retail advice. However, a percentage rate or flat fee may be charged for specialist advice (for example corporate management advice). In all cases, any fees or charges will be negotiated and agreed with you when discussing your request.

## How are we paid for the Financial Services provided to you?

For most of our services, such as our Reporting & Administration, you will pay us directly. However, for our On-Market Dealing (Transaction) Services, you will pay our selected third party stockmarket provider e.g. Australian Investment Exchange Limited (AUSIEX). What you pay to them will include both what is due to them and also what is due to us for arranging the service (i.e. a portion of what you pay to them is rebated to us). In the case of some stockmarket capital raising 'Applications' (for example, Initial Public Offerings) which we arrange on your behalf, we will usually be paid by the 'Issuer/Seller' and this payment may usually be in the form of a percentage of the investment made and will be specifically disclosed at the time to you.

## How is your Adviser paid?

Your Adviser is remunerated through a salary and bonuses. No commissions or volume based remuneration is received.

## Do you get details of the specific benefits your Adviser gets if you act in accordance with the recommendations made to you?

Yes, in the case of Personal Advice (i.e. advice tailored to relevant elements of your 'objectives, situation and needs'). When your Adviser recommends that you take a particular course of action in relation to a Financial Product(s), the regulations oblige us to provide details of the commissions and other benefits your Adviser (and we) will or may receive if you act as recommended. This information will be provided to you orally and/or in writing (e.g. in the form of a 'Statement of Advice').

Whether providing 'Personal Advice' or 'General Advice' (i.e. a 'rating' or 'opinion' in relation to 'Financial Product', based solely on its 'investment-merits', without considering the question of its 'appropriateness' for you) to you, your Adviser must also inform you of any association, relationship or other interest(s) that they, Sentinel Financial Group or any associate of either has that may reasonably be expected to be capable of influencing the 'opinion' or 'rating' of the Financial Product(s) concerned or the recommended course(s) of action being presented to you.

## **E. What associations or relationships are there between Sentinel Financial Group or any related bodies corporate, and issuers of financial products which might reasonably be expected to be capable of influencing us in providing any of our financial services?**

Sentinel accesses listed markets through outsourcing relationships with specialist stockbroking services providers known as Third Party Trading and Settlement Participants. These outsource providers connect directly to the stockmarket, allowing Sentinel to specialise and focus on delivering its high level of stockmarket services to you.

As part of these relationships, any brokerage charged to you by Sentinel is first collected by the relevant Third Party Participant and then rebated (less service costs) to Sentinel.

Sentinel's current Third Party Participant outsource providers include:

- AUSIEX
- CMC Markets

## F. Does Sentinel Financial Group have complaint resolution procedures?

If you have a complaint about, or are dissatisfied with, the service provided to you, you should take the following steps:

1. Contact your Advisor and tell your Advisor about your complaint.
2. If your complaint is not satisfactorily resolved over the telephone within 5 business days, please contact the Complaints Manager of Sentinel Financial Group or put your complaint in writing, together with relevant documentation, and send it to us addressed to:

**Complaints Manager  
Sentinel Financial Group  
GPO Box 2514  
Perth WA 6001**

When the complaint is received, our Complaints Manager will contact you within 48 hours in relation to resolving your complaint or to advise you of the steps that will be taken to address it. We will try and resolve your complaint quickly and fairly.

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

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

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

**Telephone: 1800 931 678 (free call) [1]**

**In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001**

Sentinel Financial Group is a Member of this Scheme. The Australian Securities and Investments Commission ('ASIC') also has a free call infoline on 1300 300 630 which you may use to make a complaint and obtain information about your rights.

## G. Is the Personal Information I provide to Sentinel Financial Group private and confidential?

Sentinel Financial Group is committed to protecting and maintaining the privacy, accuracy and security of the personal information we will hold about you. The personal information you provide and that we collect for our use or as requested by our trade execution and settlement providers is handled in accordance with the respective Privacy Policies of each organisation, copies of which are available upon request.

Your personal information will be used for establishing and maintaining you as a client, to facilitate execution of transactions and registration of your holdings of securities, derivatives and other financial products, and for the purpose of providing our various services to you. Should you choose not to provide us with the personal information requested, we may be unable to provide some or all of the advisory or dealing services you require. Regulatory requirements oblige us to record your identity and to know your financial circumstances sufficiently to ensure personalised advice is suitable for you. Consequently, you must notify us of changes to personal information we hold about you.

In relation to transaction services we would usually disclose personal information about your identity and address to our trade execution and settlement providers, the Australian Clearing House Pty Ltd ("ACH"), the operator of CHESSE, and Share Registries. In general, your personal information will be disclosed internally, including to other members of the Sentinel Financial Group, for matters of internal administration and operations. We may be required to disclose your information to the ASX (and ASX Group members), SEGC and any court or tribunal, authority or regulatory body such as ASIC and operators of disputes or complaints resolutions scheme to enable compliance with relevant legislation and regulations. We may be required to disclose your information to debt collectors, credit reporting agencies, our auditors, contractors or service providers and to other parties authorised and/or required by law to collect your information. Unless required by law or regulation, your personal information will not be passed to any third-party without your consent. Your personal information is stored securely and you have the right to review it and request its correction if in error.

If you are a company and have provided personal information about an officer or employee of yours to us in respect of your account with us, you must show this disclosure statement to your officer or employee.

If you wish to receive a copy of our Privacy Policy, review and correct personal information we hold about you, or if you do not wish to receive further information about other services or products, or if you have a complaint in relation to the privacy of your personal information, please contact our office on (08) 9225 0000.

By accepting these terms and conditions you give consent for Sentinel Financial Group Pty Ltd to disclose your name, residential address and date of birth to a credit reporting agency and ask the credit reporting agency to provide an assessment of whether the personal information so provided matches (in whole or in part) personal information contained in a credit information file in the possession or control of the credit reporting agency to assist in verifying your identity for the purposes of the Anti-Money Laundering and Counter-Terrorism Act 2006.

The credit reporting agency may prepare and provide Sentinel Financial Group Pty Ltd with such an assessment and may use your personal information including the names, residential addresses and dates of birth contained in credit information files of you and other individuals for the purposes of preparing such an assessment.

If you disagree with having your identity verified by a credit reporting agency, please select another data source or contact Sentinel Financial Group Pty Ltd so that we can discuss other options with you.



**SENTINEL**  
FINANCIAL GROUP

## CONTACT DETAILS

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Email:	<a href="mailto:info@sentinelgroup.com.au">info@sentinelgroup.com.au</a>