Financial Services Guide

Version number 24.0
1 March 2024

The purpose of this Financial Services Guide

This Financial Services Guide (FSG) has been authorised for distribution by the authorising licensee, GPS Wealth Ltd ABN 17 005 482 726, Australian Financial Services (AFS) Licence no. 254544 ('GPS').

GPS is the AFS Licensee that authorises your GPS financial adviser ('Adviser') and their firm ('we', 'us', 'our') to provide financial services.

This is an important document designed to provide you with information to make an informed decision about whether to use the financial services that we provide.

This FSG is divided into two parts and both parts must be read together. Part One of this FSG provides important information about GPS and the financial services it is responsible for. Part Two of this FSG is an Adviser Profile and more specifically outlines the services, fees, and other important information applicable to us, as an authorised representative of GPS.

Part One

Part One of this FSG provides information about:

- GPS as the holder of the AFS License that authorises us to provide financial services;
- Relationships or associations with other entities;
- Other disclosure documents you may receive;
- The financial services and types of products we provide or recommend;
- Collecting your personal information and providing us with instructions;
- Fees or costs that may apply to you;
- Remuneration that GPS, us, your Adviser, or a related entity may receive; and
- What you can do if you are not happy with our services or have a complaint.

Not Independent

GPS and its authorised representatives maintain relationships with product issuers which prevents us from being classified as *independent*, *impartial*, or *unbiased* under s923A of the Corporations Act 2001.

Commission Payments

GPS and its authorised representatives may receive regulated commissions from life insurance product issuers where financial services are provided in relation to these products.

For more information on commission payments, refer to section 4.

GPS's Approved Product List (APL)

Authorised representatives of GPS are generally restricted from recommending products that are not part of GPS's APL.

GPS may utilise Lonsec Research as a primary research provider for the construction of GPS's APL. Lonsec Research is a wholly owned subsidiary of Lonsec Holdings Pty Ltd (ABN 41 151 235 406) (Lonsec Holdings). Lonsec Investment Solutions Pty Ltd (ABN 95 608) is also a subsidiary of Lonsec Holdings, and portfolios managed by this entity may appear on GPS's APL.

GPS has established a partnership program with a number of financial product issuers, through which it receives financial benefits. While these financial benefits are strictly governed for the purpose of funding education initiatives for GPS's authorised representatives, participating product issuers may also have products included on GPS's APL. For more information on GPS's APL, refer to 'Approved Products', in section 3, below.

Contacting GPS

If you need to contact us, you can speak with your Adviser. You can also contact GPS using the following details:

Writing:	GPS Wealth GPO Box 1453 Sydney NSW 2001
Phone:	1300 650 432
Email:	info@count.au

1. About GPS

GPS is a subsidiary of Count Limited ABN 111 26 990 832 ("Count"). Under these arrangements GPS provides client engagement services, training, licensing, compliance, investments advice and support services to the Advisers.

2. About Count

Count is a listed Financial Services provider (ASX: CUP). Count's purpose is to help Australians afford their dreams. Count educates clients and helps them make informed decisions about their future. So, whether you are just starting out or approaching retirement, Count can assist you by providing you with a financial plan which gives you greater control over your financial future.

Count has subsidiaries and associates that provide accounting and financial advice services.

3. Other relationships which might influence GPS in providing financial advice services

Hub24 Limited

Count is the owner of GPS. HUB24 Limited is an ASX listed provider of investment administration platform and technology services and holds a material shareholding in Count.

The Hub24 platform is available to us through an APL. We are obliged to always act in a client's best interests and will only recommend the use of the Hub24 platform if it is appropriate to do. We also continue to use other platforms to implement our investment advice and you are free to request us to use an alternative platform if you would prefer. Importantly, we are not under any incentive, sales target, or obligation to recommend the Hub24 platform.

CARE Managed Accounts

DWA Managed Accounts Pty Ltd ('DWA') (AFSL 264125), a subsidiary of Count, will receive fees for the provision of investment advice in their role as investment adviser to the CARE investment process (please contact your Adviser for more details of the CARE investment process). Any such fees will be outlined in the SoA, should it be applicable, and relate to the work done by DWA's Investment Committee in maintaining the CARE portfolios.

The CARE Portfolio Management fee is 0.297% (inclusive of GST) of funds invested as part of CARE. For example, if your account balance in the CARE Managed Account facility was $100,000, the fee would be $297 (inclusive of GST) for that year.

No part of this fee is paid to GPS.

4. Disclosure documents

You may receive the following documents when your Adviser provides financial services to you.

Statement of Advice (SoA)

If your Adviser provides personal advice tailored to your circumstances and needs, you will receive a SoA. The information contained in the SoA will help you make an informed decision in relation to the advice provided. It also sets out the advice, the reasons for the advice and details about any remuneration payable.

Record of Advice (RoA)

In certain circumstances, if you were previously issued with a SoA, your Adviser may provide further advice without the need for another SoA. Where this is the case, you will be provided with a Record of Advice (RoA). Additionally, in certain circumstances where you are provided advice on a small investment balance you may be issued with a RoA. Your Adviser may provide you with a copy of the RoA, which will outline the advice, the reason for the advice, and details about any remuneration payable.

Product Disclosure Document (PDS)

You will receive a PDS if your Adviser recommends a financial product or offers to arrange the issue of a financial product at your request. The PDS contains information about a financial product's features, fees, benefits and risks.

5. Services and products we offer

Having access to a comprehensive range of products and services helps ensure your Adviser can provide a tailored financial solution just for you.

Advice services we provide

GPS's AFS Licence authorises the provision of financial services related to the following classes of financial products:

- Basic deposit products
- Life insurance
- Government debentures, stocks and bonds
- Managed investment schemes
- Retirement Savings Accounts
- Securities
- Superannuation, and
- Standard margin lending

Approved products

Count's specialist product research team undertakes due diligence on product providers and also uses independent research providers to select a range of high-quality products which your Advisers may recommend.

While other products may also be suitable to your needs, your Adviser will generally only provide advice on products that are listed on the GPS APL.

All products included on the GPS APL must meet Count's rigorous selection criteria and approval process.

Depending on your objectives, financial situation and needs, your Adviser may need to recommend a financial product that is not on the GPS APL. If this occurs, any product recommended by your Adviser must still meet GPS's selection criteria and approval process. The specific financial services and types of products that your Adviser is authorised to provide are outlined in Part Two of this FSG.

Non-advised transactions

At times you may wish to make an investment transaction and do not need assistance from us with any decisions in relation to the product or transaction. In these cases, we can take your instructions and arrange for the transaction to be completed, without providing personal advice. If you wish to proceed without advice from us, we will ask you to confirm your instructions in writing and sign an acknowledgment form. Any assistance we provide to complete your transaction should not be taken as a recommendation or endorsement of the product or transaction.

Services GPS is not responsible for

GPS is only responsible for those financial services or products offered by your Adviser in their capacity as an authorised representative of GPS. This does not include any other services your Adviser may provide in any other capacity, including as an accountant or tax agent, such as:

- Taxation advice and services, e.g., completing tax returns,
- Accounting and audit services,
- Self-Managed Super Fund compliance and administration services,
- Advice on specific credit products (excluding Margin Lending),
- Business or legal advisory services,
- Advice on unlisted or private companies and investments, private development funds, franchises, high yield debentures, direct property, property syndicates, solicitor's or other mortgage schemes, derivatives, general insurance or direct international share holdings, and
- Any other services not provided as an authorised representative of GPS.

In all your interactions with your Adviser, it's essential to ensure that you understand who is accountable for the advice or services offered to you. If you need additional clarification, please feel free to contact your Adviser or GPS.

In order to provide tax (financial) services to you an Adviser must be a Qualified Tax Relevant Provider (QTRP). Based on the information collected from you, your Adviser will consider the tax consequences that relate directly to the financial advice being provided, however, this financial advice will not include an assessment of your overall tax position. To determine how your Adviser's financial advice fits with your overall tax position, you should seek separate tax advice about liabilities, obligations or entitlements that arise, or could arise, under taxation law.

6. Remuneration that we or GPS may receive

All advice fees, including non-advised fees, and commissions are paid directly to GPS as the licensee. GPS may retain a percentage, and the remainder, that is attributable to the financial services we provide, is passed on to us.

If the fees, commissions or benefits cannot be determined at the commencement of our services, we will describe the manner by which they are calculated and provide you with an estimate of the applicable remuneration.

Financial planning advice fees

The fees or other costs associated with the services we offer and products we recommend depend on the complexity of your situation and the nature of the advice provided.

Your Adviser will discuss and determine the fees with you before providing any advice or services. Typically, payment for our services is through our financial planning advice fees.

We will clarify the method for calculating costs and provide you the actual costs in an agreement before starting any work that you will be charged for. You can ask for more information about the fees and the remuneration we may receive. The fees and charges for our advice and service may be based on a fixed dollar amount, percentage of funds invested, an hourly rate, or any combination of these.

Where we are aware that you have used borrowed funds to invest, including where we recommend that you borrow to invest, we will not charge you percentage-based fees on the borrowed amount.

Our financial planning advice fees generally include charges for providing you with a SoA, RoA, ongoing advice and services, or other transaction-related fees. You may choose to pay these fees directly or from an eligible financial product which you hold, or which we recommend.

Please refer to Part Two of this FSG for further details on fees that we charge.

Insurance commission payments

When we advise on an insurance policy that you hold, or we recommend, we may receive initial and ongoing commission payments from the product issuer.

An initial commission is a one-off payment made upon entry to a financial product and an ongoing commission is paid each year, starting from the second year, as long as you hold the policy. These commissions are a percentage of the premiums you pay. They are not paid directly by you but instead paid by the product issuer. We only receive commission where we are entitled to receive these payments through existing arrangements with product providers.

If you are charged a financial planning advice fee, we may rebate some or all of the above commission to you.

Detailed Commission Rates

Additional cover added to an existing product which was issued before 1 January 2018

The initial commission we receive on insurance products may be up to 124% of the first year's premium. The ongoing commission we receive may be up to 33% per annum of the renewal premium.

Additional cover added to an existing product which was issued after 1 January 2018 and before 1 January 2020

Where additional cover is added on or after 1 January 2019 and before 1 January 2020, to an existing product issued after 1 January 2018, the initial commission that GPS will receive will be no more than 77% of the increase in premium. The ongoing commission that GPS can receive will not exceed 22% p.a. of the premium (33% p.a. of the premium for level commission structures).

Additional cover added to an existing product after 1 January 2020

Where additional cover is added on or after 1 January 2020, to an existing product issued after 1 January 2018, the initial commission that GPS will receive will be no more than 66% of the increase in premium. The ongoing commission that GPS can receive will not exceed 22% p.a. of the premium (33% p.a. of the premium for level commission structures).

New products issued on or after 1 January 2020

The initial commission that GPS may receive on insurance products applied for and issued on or after 1 January 2020 will be no more than 66% of the premium in the year of issue. The ongoing commission that GPS can receive will not exceed 22% p.a. of the premium (33% p.a. of the premium for level commission structures).

Referral fees

If you have been referred to your Adviser or us by a third party, Count, GPS or the Adviser's firm may also receive a benefit for referring you to third parties for specialist services. These benefits are not passed on to your Adviser.

Class Super is GPS's preferred third-party service provider of software to assist in the administration of Self- Managed Super Funds. In situations where you purchase this software Count may receive up to 17.5% of the annual software licence fee.

If applicable, further details will be disclosed in Part Two of this FSG or within your SoA.

Fee rebate or waiver

GPS, your Adviser and/or we may also receive fee waivers, fee subsidies and/or fee reimbursements. These fees are for the provision of support services provided by GPS to its authorised representatives, including expenses such as annual membership fees, software and data service fees, paraplanning fees, as well as travel and accommodation costs related to conferences and training events.

Professional Development Sponsorship

Count may receive sponsorship payments from product providers which are in no way linked to volume of sales. These sponsorship arrangements help Count to offset the organisational and running costs of providing education and training services to GPS's authorised representatives.

Safeguards Adopted

GPS has adopted safeguards to manage conflicts of interest that may arise wholly or partially in relation to the activities that we undertake. These may include:

- us providing full disclosure of the conflict of interest, potential conflict of interest, or perceived conflict of interest to you,
- us referring you to another adviser to provide advice to you, and
- us declining or withdrawing the services provided to you.

We consider these safeguards to be a robust and effective way to manage and prevent conflicts of interest. If we detect a conflict of interest, we will act as an impartial advisor would, prioritising advice that is in your best interests.

7. Complaints, privacy and compensation arrangements

How we handle your personal information

GPS is committed to ensuring the privacy and security of your personal information. As part of its continuing commitment to client service and maintenance of client confidentiality, GPS has adopted the principles set out in the Privacy Act 1988. For further details you can refer to GPS's Privacy Policy, available at: www.count.au/privacy

If you wish to review your personal information held by us, please contact your Adviser directly, or GPS by emailing info@count.au.

You may also contact the Australian Securities & Investments Commission (ASIC) on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights.

As a financial service provider, we have obligations under the Anti-Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as your passport or driver licence. We will also retain copies of this information. We cannot provide you with services if you are unwilling to provide this information.

What to do if you have a complaint

We are committed to resolving your concerns. If you are not fully satisfied with any part of the service or advice you have received, for whatever reason, you should take the following steps:

Step 1: Contact your Adviser

You should contact your Adviser in the first instance and discuss your concerns with them. Most complaints can be resolved quickly and fairly at this stage.

Step 2: Contact the GPS Complaints Manager

If your complaint is not resolved by your Adviser to your satisfaction, or if you would prefer to contact GPS directly to discuss the issue, it has an internal complaints process through which it independently reviews and seeks to address your concerns. In these circumstances your complaint will be escalated to the GPS complaints manager who will aim to resolve your complaint quickly and fairly and will communicate a proposed solution to you. GPS will try to resolve complaints as quickly as possible, and in any event within 30 days of receipt of your complaint. GPS will let you know if it needs more time to finalise your complaint.

Writing:	GPS Complaints Manager GPO Box 1453 Sydney NSW 2001
Phone:	1300 650 432 (option 2)
Email:	reportcomplaints@count.au

Step 3: Contact the Australian Financial Complaints Authority (AFCA)

If you remain dissatisfied with the outcome provided by our, or GPS's internal complaints processes, you are entitled to refer your complaint to the Australian Financial Complaints Authority (AFCA). AFCA is an external, independent body offering free and accessible dispute resolution services to individuals who have been unable to satisfactorily resolve their complaint.

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

The AFCA contact details are set out below:

Writing:	Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
Online:	www.afca.org.au
Phone:	1800 931 678 (free call)
Email:	info@afca.org.au

Our compensation arrangements

GPS has professional indemnity insurance cover in place and these arrangements comply with the requirements for compensation under the Corporations Act.

GPS's professional indemnity insurance is subject to terms and exclusions and generally covers claims arising from the actions of our current and former employees or authorised representatives whilst they acted on GPS's behalf.

Privacy Collection Statement

We collect and verify personal information about you (and where applicable, persons acting on your behalf) to manage our relationship with you, to ensure that we provide the products and services most appropriate to your needs and to make certain that we comply with our legal obligations under the Privacy Act 1988 (Cth) and under the Corporations Act 2001 (Cth). This Privacy Collection Notice forms part of our Privacy Policy, and together they form our notice for collecting personal information under Australian Privacy Principle 5.

The information required to be collected and verified by us depends on who you are and the nature of the service to be provided by us. If you fail to provide us with the required information, or if you provide us with incomplete, or inaccurate information we may not be able to provide you with the products or services you are seeking within the time periods contemplated. For a complete list of the information we may collect and verify please see our Privacy Policy.

If you elect not to provide us with the personal information you may be exposed to higher risks in respect of the recommendations made to you and this may affect the adequacy or appropriateness of advice given to you. Alternatively, we may elect to terminate our relationship with you if we believe we are unable to provide you with adequate service.

Personal information acquired by us in the course of providing our services may be provided to external service providers, product and platform providers, auditors, taxation and legal advisers and information technology consultants. Otherwise your personal information will not be disclosed unless:

- Australian law requires us to; or
- you authorise us to disclose it to a 3rd Party on your behalf, e.g. your tax adviser.

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might be stored or accessed in overseas countries, including but not limited to New Zealand, Sri Lanka, Singapore, United Kingdom, Philippines, India and the United States of America. Details of the countries we disclose to you may change from time to time. You can contact us for further details regarding where we may send your personal information.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, we will take reasonable steps to ensure that overseas providers do not breach the Privacy Act and that any third parties are subject to a similar level of protection or similar obligations that are offered by the Privacy Act. If you do not agree to the transfer of your personal information outside Australia, please contact us.

Some of our financial advisers may enter their own outsourcing arrangements to countries other than those detailed above. Those arrangements will be disclosed separately by the financial adviser to their clients.

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can always access the personal information held about you by contacting us.

A copy of our Privacy Policy is on our websites. Otherwise if you contact us, we can send you a copy.

This FSG Part 2 contains information specific to your adviser and should be read together with the FSG Part 1. GPS Wealth Ltd has authorised your adviser to distribute this FSG.

Who is providing the financial services?

Your Financial Adviser is Charitha Wasala (Charitha).

I am an Authorised Representative of GPS Wealth Ltd AFSL 254 544 and am authorised by GPS Wealth Ltd to provide the financial services described in this FSG.

My Authorised Representative number is 1266708.

What experience does your financial planner have?

1.Founder and Director
Growth-prof -Feb 2021 - Present
Growth-prop
Growth Guardian
LodgePro
2.Director
Sunnyside Accountants - Oct 2019 - Feb 2021
3.Senior Manager
CMPARTNERS- Feb 2018 - Oct 2019
4.Tax Senior
HLB Mann Judd -Jun 2017 - Feb 2018
5. Tax Consultant
M G Arthur & Associates - May 2016 - May 2017
6. Tax Senior
Lee and Alexander Chartered Accountants -Dec 2012 - Apr 2016
7. Tax Accountant
Tower Accountants Australia - Aug 2010 - Dec 2012

Does your adviser have any associations and conflicts of interest?

I am a sub-authorised representative of @Growth Financial Pty Ltd ABN 48 677 764 797, an authorised representative (no. 1266708) of GPS Wealth Ltd ABN 17 005 482 726

@Growth Financial Pty Ltd may have referral arrangements with other professional service providers. If a client is referred to us, we may pay the referrer a fee or other benefit. We will record the details of any referral fees in the Statement of Advice we prepare for you. If we refer a client to another service provider they may pay us a referrer fee. We will only refer you to third party professionals, where we believe it is in your best interest to do so.

All fees and commissions are paid to @Growth Financial Pty Ltd.

I am a Director / Shareholder of Growth Prop Pty Ltd which provides Accounting services (a separate entity to @Growth Financial Pty Ltd) and may therefore benefit from you using their services. We will only recommend you use these services where we believe it is in your best interest to do so, and with your agreement.

I am a Director / Shareholder of @GROWTH GUARDIAN PTY LTD which provides SMSF Administration services (a separate entity to @Growth Financial Pty Ltd) and may therefore benefit from you using their services. We will only recommend you use these services where we believe it is in your best interest to do so, and with your agreement.

I am a Director / Shareholder of LodgePro Pty Ltd which provides Accounting / Tax Advice services (a separate entity to @Growth Financial Pty Ltd) and may therefore benefit from you using their services. We will only recommend you use these services where we believe it is in your best interest to do so, and with your agreement.

Please refer to FSG Part 1, for further information on other relationships that might influence Count Limited (Count) in providing financial advice services, we will also disclose any associations or conflicts within the Statement of Advice, that we prepare for you.

What qualifications has your adviser completed?

Qualification Name
RG146 Superannuation & SMSF
Australian Commercial Law I (TAFESA TPB3)
Australian Commercial Law III (TAFESA TPB5)
Bachelor of Science

Authorised Products and Services

I am authorised in the following products and services:

Deposit and Payment Products – Basic Deposit Products

Government Debentures, Stocks or Bonds

Managed Investment Schemes including IDPS

Retirement Savings Accounts

Superannuation

Self-Managed Superannuation Funds

Schedule of Fees

These fees should be used as a guide only. We will discuss your individual needs and agree our fees with you before we provide advice. The actual agreed fees will depend on the complexity of your circumstances, goals and needs and the scope of advice we provide. Our fees are set out below:

- Plan preparation and implementation fees. These are the fees you pay when you have agreed to receive our advice and will be between and , inclusive of GST, depending on complexity and scope of advice.
- Annual Ongoing service fees. These are the fees you pay when you agree to receive our ongoing advice, and will be between pa and pa, inclusive of GST. Our ongoing services will be agreed with you in an ongoing services agreement.

How will your financial adviser be paid for the services provided?

All fees and commissions disclosed in the FSG which are attributed to the services provided to you by your adviser are paid to GPS Wealth Ltd.

GPS Wealth Ltd will pay up to 100% of those fees and commissions to @Growth Financial Pty Ltd.

@Growth Financial Pty Ltd may pass on up to 100% of those fees and commission to Charitha Wasala.

I am a Director / Shareholder of @Growth Financial Pty Ltd and am remunerated through the payment of salary and bonus / dividends / trust distributions.

How can you contact your financial adviser?

Charitha Wasala

@Growth Financial Pty Ltd

Website: https://envisoro.com.au/

Office Address: G04, 229 Miller Street North Sydney NSW 2060

Phone:

Mobile: 0291893075

Email: tax@growth-prof.com.au

Postal Address: PO Box 707 NORTH SYDNEY NEW SOUTH WALES 2059

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