



FINANCIAL SERVICES GUIDE

Your Adviser

Michael Carlton - Authorised Representative Number - 239724

Mascar Holdings Pty Ltd ATF Carlton Family Trust ABN: 51 283 954 577
Corporate Authorised Representative Number -1233485

Trading as PECUNIA Private Wealth Management

Telephone +61 2 6583 7446
1300 112 676

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Address Suite 4, 106 Horton Street, Port Macquarie, NSW, 2444
P.O Box 5720, Port Macquarie BC, NSW, 2444

Website www.pecunia.com.au

Arrow Securities Group Pty Ltd

AFSL 448218

ABN 30 165 731 144

Address PO Box 111, Vaucluse, NSW, 2030

Telephone +61 2 8006 7573

What is the purpose and content of this Financial Services Guide?

This Financial Services Guide (FSG) is an important document which provides you with information about Michael Carlton & Mascar Holdings Pty Ltd ATF Carlton Family Trust and help you decide whether to use our financial services. It contains information on:

- Who We are and how we can be contacted;
- The services We offer;
- How We, Our representatives and other parties involved in providing the financial services are paid in relation to the services We offer;
- Potential conflicts of interest
- Compensation arrangements; and
- Internal and external dispute resolution procedures and how you can access them.

Who is our Licencee?

Arrow Securities Group Pty Ltd (ASG) is an Australian Financial Services Licence holder (AFSL No. 448218) under which it is licensed to provide general and personal financial product advice about, and deal in, certain financial products on behalf of retail and wholesale clients.

Who will be providing the financial services to me?

Michael Carlton & Mascar Holdings Pty Ltd ATF Carlton Family Trust t/a PECUNIA Private Wealth Management will be providing the financial services to you.

Michael Carlton is appointed as an Individual Authorised Representative (No: 239724) of Arrow Securities Group Pty Ltd AFSL 448218, ABN 30 165 731 144.

& Mascar Holdings Pty Ltd ATF Carlton Family Trust is appointed as Corporate Authorised Representative (No. 1233485) of Arrow Securities Group Pty Ltd AFSL 448218, ABN 30 165 731 144.

Michael Carlton & Mascar Holdings Pty Ltd ATF Carlton Family Trust
ABN 27 619 484 749

Business Address: Suite 4,
106 Horton Street
PORT MACQUARIE NSW 2444

Phone No: 02 6583 7446

Email: admin@pecunia.com.au

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

PECUNIA Private Wealth Management can provide advice on and deal in the following products:

- Superannuation and Self-Managed Super Funds
- Retirement Savings Account Products
- Interests in Managed Investment Schemes (incl. IDPS)
- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Securities
- Life Products, including:
 - Investment Life Insurance Products
 - Life Risk Insurance Products

We will only recommend a product or strategy to you after considering its suitability for your individual situation and needs.

We do not provide advice in any other area of insurance or investments but can refer you to a professional who specialises in other areas if requested.

Any arrangements you make with the other professional will be strictly between you and that person and neither Arrow Securities Group nor our Authorised Representative accept any responsibility or liability for the advice given.

Do you receive remuneration, commission, fees or other benefits in relation to providing the financial services to me and how is that commission calculated?

Michael Carlton & Mascar Holdings Pty Ltd ATF Carlton Family Trust will be paid the remainder of the brokerage and/or fees received by Arrow Securities minus a Licensing Fee for the provisions of professional services from Arrow Securities Group. The Licensing Fee is a tiered fee that increases as volume increases. The fees received are used to provide income after paying for the normal expenses incurred with running a business (e.g. rent, vehicle, computer, stationery, professional fees etc.).

Insurance Monitoring:

Internal databases are maintained detailing client's insurances that were recommended by our Authorised Representative on behalf of Arrow Securities Group. This does not constitute portfolio monitoring. Portfolios are reviewed on a regular basis, subject to the client's discretion.

Note: This Financial Services Guide (Version. 4 – Issue 1 dated 1 November 2018) is for the sole use by Michael Carlton & Mascar Holdings Pty Ltd ATF Carlton Family Trust and was prepared on 27 June 2018 issued with the authority of Arrow Securities Group Pty Ltd, Australian Financial Services Licence No. 448218

Trading, advice and research

ASG or its representatives may have interests in particular financial products, research subjects or derivatives through various roles. In addition, ASG or its representatives may buy or sell the financial products or research subjects and derivatives and as such may effect transactions which are not consistent with recommendations provided to you by your advisor at ASG.

Do we have any relationship or association with any product providers?

Neither Mascar Holdings Pty Ltd or Michael Carlton(PECUNIA Private Wealth Management) hold any commercial arrangements with any product providers .

ASG may have commercial arrangements in place with various product and or service providers to enable Us to execute transactions and provide financial service and products on your behalf. Any related fees and charges are described in this FSG.

We do not have any other relationships or associations which might influence us in providing you with our services. If we believe a conflict may arise we will advise you in the SoA or otherwise prior to providing such product or service.

Getting Personal Advice

When we provide you with general advice about products and services, the advice will be provided without investigating or commenting on their suitability for you. You should consider the appropriateness of the advice provided in light of your own objectives, financial situation or needs.

When we provide personal advice that takes into account your personal needs we will provide you with a statement of advice (“SoA”). The SoA will contain the advice, the underlying basis for our recommendations and information regarding commissions, fees or associations with third-parties that may influence that advice.

We may also provide you with a Record of Advice (‘RoA’) where further advice is sought in relation to that provided in the SoA and where there is no significant change to your circumstances.

A Fee Disclosure Statement, which contains information about the services you are entitled to receive and actually received, and the fees paid, may also be provided to you where you pay an ongoing fee for a period of more than 12 months.

The advice and recommendations provided will be impacted if you provide incorrect, incomplete or limited information.

In other circumstances we may provide you with only general advice. In such circumstances we are obligated to warn you that our general advice provided to you as a retail client does not take into account your objectives, financial situation or needs.

Where relevant, to assist you in making an informed decision about a particular financial product, you will be provided with a disclosure document such as a prospectus or product disclosure statements (PDS) supplied by the product issuer, who will give you information about that product

How may you provide instruction to Us:

You may give Us instructions by telephone, in person and in writing (including email and fax where authorised by Us) in relation to any of Our services and transactions for execution. Please note that your telephone conversations with ASG may be recorded.

However, we reserve the right to request written instructions from you relating to the subject matter of your instructions where necessary and where subject to the terms and conditions of any applicable agreement with you

How we are paid for our services:

All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

Initial Meeting

This initial meeting is at no cost to you. This meeting is to determine if there is a fit between you and PECUNIA Private Wealth Management. Our main aim is to gather information about yourself and to determine your primary goals and objectives in seeking advice. At the end of this meeting, we will outline the next steps and detail any fees applicable if we believe we can add value to your position.

Advice Preparation Statement of Advice Fee Paraplanning Fee

Strategy	Advice Fee	Implementation Fee
Basic	\$1,100 minimum	\$550 minimum
Intermediate	\$2,200 minimum	\$1,100 minimum
Advanced	Per case basis	Per case basis
Business	Per case basis	Per case basis

Implementation of Initial Advice Fee

Our fee structure is flexible and is driven by your needs. They are based on the time and service level required and the amount of benefit that you gain. The SOA preparation fee will depend on the complexity of your individual circumstances and the type of advice you require. The Implantation Fee will depend on the level of complexity of your situation and the advice provided. This fee may be paid by invoice or where authorised by you, deducted from your superannuation or investment account.

SOA Presentation Appointment

This meeting is to present your strategy. The presentation of your strategy will be at our offices or at a mutually agreed venue and will outline any further fees/commissions inherent in implementing your strategy.

Ongoing Service Fee for advice

The ongoing advice fee can range from \$1,100 per annum minimum. This fee may be paid by invoice or where authorised by you, deducted cost to you. The fee is determined by the levels of services that you request and the ongoing complexity of the circumstances. This is generally a fixed rate per month as agreed. Between your adviser and yourself.

Hourly Fee for Advice & Ad Hoc Advice

Where you do not wish to participate in an ongoing advice fee arrangement but require ongoing advice on an ad hoc basis, an hourly fee of between \$110 and \$302.50 will apply.

Commissions

Generally, PECUNIA Private Wealth Management does not receive up-front commissions for investment business placed with any fund manager or insurance provider.

In the event that any commissions are received by us for any form of investment business with a fund manager this will be disclosed to you.

PECUNIA Private Wealth Management has elected not to receive any form of commissions from Life Insurance based recommendation or the placement of recommendations into Life Insurance products, we will however charge our Statement of Advice Fee as agreed and also an implementation fee.

Should any such Life Insurance business inadvertently pay us a commission for the implementation of any recommended product, such as Term Life Insurance, Total & Permanent Disability Insurance, Trauma (Critical Illness) Insurance and Income Protection Insurance it is our policy to have these rebated back you the client in full.

How we are paid for our services:

All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

Share Brokerage

Whilst not being an ASX Credited and Licenced Stock Broker PECUNIA Private Wealth Management through its affiliations with leading Stock Brokerage houses is able to offer these services.

One Off Share Trades (Non - Advisory & Non Ongoing Service) Clients

We are able to take instructions from you to buy and sell shares as a one off trade in which we will need you to sign a Client Declaration and Waiver which states that you have purely instructed us to facilitate your request and we have not provided you with any form of advice in this regard.

Minimum Costs: \$150.00 + GST or 1.10% whichever is the greater

Do you receive or pay referral fees?

Where We have referred you to another professional to provide you with financial services, We have chosen **not to receive** a referral fee from that service provider.

You may have been referred to Us by a services provider who may receive financial or non-financial benefits from Us. This should have been disclosed to you by the service provider in question. Please note that any such benefits will not impact fees charged to you by Us or the price you will be offered for any other product. A fee of up to 100% may be paid or received.

What are the compensation arrangements?

In line with section 912B of the Corporations Act 2001, We have adequate professional indemnity insurance in place to cover Us for the financial services We provide. The scope of the insurance includes any claims relating to the conduct of Our representatives even if those representatives are no longer employed by Us at the time of a claim.

Receiving Tax Advice

Your financial planner is a registered tax (financial) adviser. They are authorised to provide a tax (financial) services, where the advice is: a) provided in the context of the personal advice authorised by the licensee, and b) part of the financial advice which interprets and applies the tax laws (including tax, superannuation and SMSF laws) to your personal circumstances. As a registered tax (financial) adviser, they are not authorised to provide tax agent services (i.e. those services in relation to the preparation and filing of tax returns and liaison with the ATO, etc.).

Complaint Process

PECUNIA Private Wealth Management would like to provide you with the very best service at all times. We understand that sometimes there may be issues that you would like to resolve. The recommended course of action is:

If you have a complaint about the financial services provided, you should first contact the person at ASG who provided the service to you.

If the complaint cannot be resolved in the first instance, you should contact Us in writing at the following address:

Dispute Resolution Officer
Arrow Securities Group Pty Ltd
PO Box 111 Vaucluse NSW 2030
P: +61 2 8006 7573

When your complaint is received it will be entered onto Our complaints register. The matter will be investigated by Our Dispute Resolution Officer. If Our Dispute Resolution Officer is unable to reach a satisfactory resolution within 45 business days of receipt, you have the right to refer the matter to:

Australian Financial Complaints Authority (AFCA)

Phone: 1800 931 678
Mail: G.P.O Box 3
Melbourne, Victoria, 3001

Online: www.afc.gov.au

Our Privacy Policy

We aim to protect and maintain the privacy, accuracy and security of the personal and financial information you give us. Keeping this information private is very important to us.

Arrow Privacy Policy explains in more detail our commitment to protecting your personal information. This privacy policy sets out the information handling policies of Bridging Advisory. We are committed to providing professional services and respecting the privacy of your personal information.

We are bound by the National Privacy Principles under the Privacy Act. This policy explains how we will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

Do we disclose your information with to other companies?

PECUNIA Private Wealth Management may share information with organisations that assist us to administer your investments or provide you with products and services.

Type of information we may hold

The type of information we collect and hold about you varies depending on the type of product or service we provide you. You may choose not to provide us with your personal information. Depending on the nature and quality of the information you choose to withhold, we may not be able to provide you with accurate or complete financial advice.

How do we use your information?

We use the information to provide you with financial product advice or services, in particular to assess your risk tolerance and determine investment strategies and recommendations consistent with your financial needs, objectives and personal circumstances.

We may also use the information to send you material about other products and services. If you do not want to receive this type of material, please advise us and we will stop sending you this information

How we handle a request for access to personal information

Under the National Privacy Principles, you have the right to access the information we hold about you. You can access the information in many ways, where you wish to access information about you, contact your advisor and they will make arrangements for you to do so. In some circumstances we may refuse you access to your personal information, these circumstances are limited to situations where your request may unreasonably impact upon another person's right to privacy. If we are entitled under the National Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

Anti-Money Laundry and Counter Terrorism Financing Act 2006

PECUNIA Private Wealth Management acting under Arrow Securities Group has a number of obligations under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth). These obligations may require us to carry out procedures to identify you and to verify the identification information provided. We may not be able to provide our services until all information required is received. Anti-Money Laundering and Counter Terrorism Financing legislation and regulations also stipulate that we need to report certain information about our customers to relevant authorities, including the Australian Transaction Reports and Analysis Centre (AUSTRAC). Where such reporting has taken place, we may be prevented by this legislation from telling you. Where legally permitted or obliged to do so, we may disclose that information to regulatory or law enforcement agencies, to our related bodies or to other third parties.

Financial Services Guide

Financial Services Guide Receipt

I/We confirm that an Arrow Securities Group Financial Services Guide has been provided to me/us.

Financial Services Guide Version is: FSG Version 4 - 1 November 2018

Client Name	Client Signature	Date
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Client Name	Client Signature	Date
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Advisor Name	Advisor Signature	Date
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OR

I confirm that a copy of the Financial Services Guide FSG Version 4 – 1 November 2018 was sent via email/post to:

Client Name(s):

Advisor Name	Advisor Signature
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Date Sent