

Financial Adviser Profile



Overview

Trent Crothers Financial Services Pty Ltd, trading as Crothers & Associates is a regionally based financial planning business based in Wodonga.

Crothers & Associates prides itself on honest and professional service by working with you to organise your financial affairs, create and protect capital and achieve your desired lifestyle choices. Our recommendations are always underpinned by exhaustive and professionally conducted research, which is always in the best interest of our clients.

We source leading research organisations for market assessment, technical analysis and seek practical techniques as an important component in providing financial advice and strategies.

Sarah has been employed in the financial services industry since 1999, with a passion to help clients achieve their goals through specialised strategy and product advice. She believes in taking the stress and confusion out of each individual client's concerns or goals, to work closely together and achieve future success.

Sarah Crothers is a Sub-Authorised Representative of Trent Crothers Financial Services Pty Ltd (trading as Crothers & Associates), Corporate Authorised Representative No. 343735. Authorise Representative No. 338445.

Qualifications

Sarah Crothers meets the competency requirements under ASIC's Regulatory Guide RG 146.

- Diploma of Financial Services (Financial Planning)
- Advanced Diploma of Financial Services (Financial Planning (AFP Dip.FS))
- Tax (Financial) Adviser
- ASX Listed Products Accreditation

Professional Memberships

Sarah Crothers is a member of Association of Financial Advisers (AFA), the Credit Ombudsman Service (COS) and the Tax Practitioners Board (TPB) and abides by their code of professional conduct and ethics.



Sarah Crothers

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Authorisations

Sarah Crothers is authorised to provide advice and deal in the following financial products:

- Life Products including Investment Life Insurance Products & Life Risk Insurance Products;
- Interests in Managed Investment Schemes including Investor Directed Portfolio Services;
- Deposit & Payment Products;
- Retirement Savings Accounts (“RSA”) products;
- Debentures, Stocks or Bonds issued or proposed to be issued by a Government;
- Superannuation;
- Securities; and
- Standard Margin Lending Facility.

Crothers & Associates Advice Fees and Charges

Sarah Crothers will be paid by Financial Planning Advice Fees as described in the Financial Services Guide. The amount of the benefit and how it is calculated will be advised to you during your initial meeting.

Sarah Crothers fee for the preparation of a Statement of Advice and other Advice documents will vary depending on the complexity involved and the time taken. You will be notified of the costs involved prior to the commencement of any work.

Sarah Crothers provides the option of ongoing reporting and advisory services. You will be notified of the cost involved prior to the commencement of any ongoing services.

Trent Crothers Financial Services Pty Ltd (trading as Crothers & Associates) pays a fixed licensing fee to Capstone Financial Planning Pty Ltd and will receive all revenue earned from the financial services provided to you. Sarah Crothers is an employee of Trent Crothers Financial Services Pty Ltd and will receive a salary/benefit from this company.

Other Benefits Sarah May Receive

From time to time Sarah Crothers may be invited to social or sporting events and receive the occasional gift such as a bottle of wine or hamper on special occasions. These non-cash benefits will have a value of less than \$300. A register listing the details of any non-cash benefits between \$100 and \$300 is maintained. These invitations and gifts do not influence the advice provided to you. If you would like more information you can request a copy of the register.

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This Adviser Profile has been authorised for distribution by Capstone Financial Planning Pty Ltd. AFSL No. 223135. This Adviser Profile forms part of the Financial Services Guide (FSG) and is to be read in conjunction with the FSG.

Our Commitment

Capstone Financial Planning Pty Ltd ('Capstone') is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Amendment (Enhancing Privacy Protection) Act 2012 sets out a number of Australian Privacy Principles. Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

This Privacy Policy explains our policy on how Capstone and its representatives manage your personal information.

We encourage you to check our website regularly for any updates to our Privacy Policy: www.capstonefp.com.au.

Your Personal Information

As a financial service provider, Capstone is subject to the Corporations Act 2001 and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 that require us to obtain personal information about you including:

- your name, contact details, date of birth, tax file number
- information regarding your dependants and family commitments
- your occupation and employment history
- your financial needs and objectives; and
- your assets, liabilities, income, expenses, insurances and social security entitlements.

How We Collect Personal Information

Capstone collects personal information directly from you or from third parties once authorisation has been provided by you. You have the right to refuse us authorisation to collect such information from a third party. However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate any arrangements we may have with you. Importantly, if you provide either inaccurate or incomplete information to us, you risk obtaining products or services that may not be appropriate or suitable for your needs and you may risk suffering a financial detriment or financial loss.

How We Use Your Personal Information

Primarily, your personal information is used to provide financial services to you. We may also use the information for the secondary purpose of:

- attempting to identify other products and services that may be of interest to you
- referring you to our related and associated entities
- conducting any professional quality control review program; and
- managing our business operations, such as maintaining secure IT systems.

From time to time, we may provide you with direct marketing material. If, at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

When We May Disclose Your Personal Information

In line with modern business practices common to many financial institutions and to meet your specific needs, we may disclose your personal information to the following organisations:

- superannuation fund trustees, insurance providers, fund managers and other product providers in order to manage or administer your product or service
- compliance consultants
- paraplanning contractors or temporary staff to handle workloads during peak periods
- mailing houses
- insurance reference bureaus and loss adjusters
- your professional advisers, including your solicitor or accountant as authorised by you
- information technology service providers
- another Authorised Representative of Capstone if necessary
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer of all or part of the assets of our business. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them
- a new owner of our business that will require the transfer of your personal information
- Financial Planning Association of Australia for quality assurance purposes; and
- Government and regulatory authorities, as required or authorised by law.

Cross-border disclosure of personal information

Your personal information may be disclosed to Capstone staff members and colleagues located in Australia and overseas. In most cases the information will be disclosed in the course of our monitoring and supervision activities. These activities are requirements under Corporations Act 2001 but in some cases the disclosure may also be for advice preparation and/or administrative purposes.

If we disclose your personal information to overseas recipients we will take all reasonable steps to ensure that they comply with any relevant Australian Privacy Principles (APPs). We will also seek your informed consent prior to disclosing your information overseas.

Please be aware that if the overseas recipient of the information breaches the APPs, redress under the Australian Privacy legislation may not be available. The overseas recipient may also be subject to a foreign law that could compel the disclosure of your information to a third party, such as an overseas government authority.

How We Store and Secure Your Personal Information

We keep your personal information in your physical client files or electronically. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements.

Where your personal information is kept electronically, it will only be stored online and on servers based in Australia, accessible only by authorised Capstone staff members and colleagues.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years or longer. After this, the information will be securely destroyed.

Ensure Your Personal Information Is Correct

Capstone takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information; and
- update us with any changes to your personal information as soon as possible.

If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

Access to Your Personal Information

You may request access to the personal information we hold about you, and we will respond within a reasonable period after the request is made. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person
- providing access would have an unreasonable impact on the privacy of others
- the request for access is frivolous or vexatious
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- providing access would be unlawful
- denying access is required or authorised by or under law
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal. You have the right to make a complaint if you disagree with our decisions about these matters (see below).

Using Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, 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.

Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

Your sensitive information

We will collect sensitive information only when it is reasonably necessary for us to perform our functions or activities in advising you, acting for you and dealing with you and consented to by you (e.g. when we organise insurance covers for you). Sensitive information includes racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade associations, membership of a trade union, details of health, disability, sexual orientation or criminal record.

This is subject to some exceptions including when:

- collection is required by law; and
- the information is necessary for the establishment, exercise or defence of a legal claim.

Our Website

Capstone's website may provide links to third party websites. The use of your information by these third party sites is not within our control and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards. You will need to contact or review those websites directly to ascertain their privacy policies.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

Complaints Resolutions

Please contact our Privacy Officer on (03) 8622 0700 or email compliance@capstonefp.com.au if you wish to complain about a breach of the APP or disagree with a decision that we have made about our Privacy Policy. To enable us to understand and deal with your complaint efficiently, you should set out a brief description of your privacy problem, the reason for your complaint and what action or remedy you are seeking from us. Your complaint will be investigated and responded to within 30 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

Capstone Financial Planning

This Financial Services Guide (FSG) has been produced by Capstone Financial Planning Pty Ltd ('Capstone', 'we,' 'us,' and 'our').

Capstone is a privately owned and operated financial planning company. We are not owned by a fund manager, bank or other financial institution. Capstone advisers are equipped to offer clients holistic advice and solutions that are tailored to each client's individual needs, circumstances and advice requirements.

Who is my adviser?

Your adviser is an authorised representative of Capstone. Individual details of your adviser will be provided to you in their adviser/company profile which includes details of the adviser's authorised representative number, their experience, qualifications, charging methodology and the specific services they are authorised to provide. The adviser profile forms part of the FSG and is to be read in conjunction with this document.

Your adviser acts on behalf of Capstone and we are responsible for any advisory services your adviser provides.

Lack of Independence

Under the current regulatory guidelines we are required to advise you that some Capstone advisers may specifically choose to receive life insurance commissions in lieu of charging clients directly when they are providing life insurance related advice.

In the circumstances, Capstone and our advisers would not be considered to be independent pursuant to the regulatory obligations.

If this specific circumstance occurs, it does not in any way impact Capstone's and our advisers' ability to provide clients with holistic needs-based advice and solutions.

Purpose and content

This FSG contains important information to help you decide whether to use any of the services offered by Capstone. It contains details of:

- The financial services and products we offer
- Our fees
- How we are remunerated
- Any interests, associations or relationships that could affect our advice
- Our complaints handling procedures and how to access them
- Our Privacy Policy

What other documents might I receive from Capstone?

Before you receive financial advice, you are required to authorise your adviser to undertake this work and the fees you will pay.

It is important to note that we can only provide personal financial advice after making reasonable enquiries and after giving consideration to your current personal and financial circumstances.

When we provide you with personal advice you will receive a written report called a Statement of Advice (SoA). The SoA will state your relevant personal circumstances, outline the advice being provided, the basis on which the advice is given, information about any fees, commissions, and associations relevant to the provision of the advice.

When we offer to issue, arrange the issue of or make a recommendation to acquire a particular financial product (other than securities) we will provide you with a Product Disclosure Statement (PDS). A PDS contains information about fees payable, risks, benefits, and significant characteristics of the financial product.

If your adviser believes it will be of benefit to you, they may recommend you enter into a service arrangement, which will be documented accordingly for your approval.

If you receive further financial advice from us and a SoA has been previously provided, we may record details of that advice in a Record of Advice (RoA) where certain criteria are met. The RoA will include a summary of your relevant personal circumstances or state which previous advice document contains this information, particulars of the advice being provided, the basis on which the advice is given, information about any fees, commissions, and associations relevant to the advice. You can request a copy of any relevant RoA document by contacting your adviser. These documents will assist you to make an informed decision in relation to the acquisition of a financial product.

If you have entered into a service arrangement with us, you will be provided with an annual Fee Disclosure Statement (FDS). This statement provides details of the service fees you have paid during the preceding 12-month period, the services you were entitled to receive during that period, and those you actually received. Where relevant, your FDS may also include details of the service fees you will pay for the proceeding 12-month period and the services you will be entitled to receive during that period.

You may also receive a renewal notice following every anniversary of your service arrangement. This will be provided to you in writing. You must provide your consent in order to continue to receive service and advice from your adviser. If you do not provide your consent or fail to respond, the service arrangement ceases, meaning the adviser is not obligated to give service and advice, and you are no longer obligated to continue paying the associated fee.

Advisory Services

We are authorised to provide financial product advice and deal in the following financial products to wholesale and retail clients:

- Deposit and Payment Products
- Managed Investment Schemes
- Life Products
- Securities
- Retirement Savings Accounts
- Standard Margin Lending Facility
- Superannuation
- Government Debentures, Stocks and Bonds

Remuneration

Capstone and your adviser are paid for the services they provide through various methods of remuneration, including payments made by you (service and advice fees), and payments received from product issuers. These payments will be disclosed to you in your advice/disclosure document. In circumstances where we cannot determine the amount of remuneration, we will disclose the method of calculation.

Advice Fees

The Advice Fees you pay to Capstone may comprise one or more of the following:

- A percentage fee based on the value of your holding in a financial product
- A fixed dollar amount
- An hourly rate

These fees may include:

- Statement of Advice Fee - for the preparation of a Statement of Advice
- Initial Advice Fee - for initial advisory services
- Implementation Fee - for the implementation of financial advice and products
- Adviser Service Fee - when your adviser provides you with advice and service

These fees are payable by you and may be paid either directly from you or from your financial product/s.

How will I pay for the services provided?

Prior to providing any service we will mutually agree on the method of our remuneration. We offer a variety of service levels and fee structures that can be tailored to suit your individual circumstances.

Please refer to the adviser/company profile provided to you for specific details of your adviser's charging methodology.

Insurance (risk) products

Capstone may receive an initial commission from the product issuer when you decide to buy a risk product your adviser recommends to you. This commission may range from 0.0% to 66% (including GST) of the initial premium amount, depending on the product. For example, for a Term Life base premium of \$1,000 per annum in a product where the product issuer pays Capstone an initial 66% commission (including GST), Capstone will receive commission of \$660 (\$600 plus GST). Some product providers may pay commissions on stamp duty and policy fees. Initial commissions may also be payable to Capstone on any premium increases resulting from increases in sums insured that you decide to make during the time you hold the product. This initial commission will only apply to the component of the increased premium resulting from the increase in sum insured. Capstone may also receive ongoing commission, which may range from 0.0% to 33% (including GST) of the renewal premium from the 2nd year. For example, an annual base premium of \$1,000 in a product whose issuer pays Capstone a 33% (including GST) ongoing commission from the 2nd year, Capstone will receive an ongoing commission of \$330 per annum (\$300 plus GST).

Distribution of remuneration

Remuneration is payable to Capstone in the first instance. Capstone will then pay any remuneration earned to your adviser/their company. Details of these payments will be disclosed in your advice/ disclosure document.

Other forms of remuneration

A) Training and education partner program

To assist in the provision of regular professional training and development, including ongoing technical training and updates in relation to financial products for Capstone's advisers and support staff, we have developed formal business partner relationships with a number of financial product providers. Each year we selectively invite leading financial product providers to participate in our training and education program. Participants each contribute financially to this program. It is important to note that Capstone's financial product range is not influenced by any program as Capstone subscribes to independent research and all products are individually assessed on their own merits. Our program meets all required legal and regulatory standards.

B) Employee non-cash benefits

From time to time, the employees of Capstone may receive non-cash benefits with a cash value less than \$300. A register listing the details of any non-cash benefits between \$100 and \$300 is maintained. These non-cash benefits do not influence the financial product recommendations provided by our advisers to you. If you would like more information, you can request a copy of the register.

Requesting further information

You have a right to request further information in relation to the remuneration, the range of amounts, rates of remuneration and benefits received by Capstone and/or your adviser. This includes remuneration that may be generated from services other than personal advice. Any request for further information should be made before any service is provided and within a reasonable time frame.

Other important information

How can I give you instructions?

You can give us instructions by telephone, email or other means agreed with us. Some financial products have their own rules about how to give instructions. Please refer to the Product Disclosure Statement of the relevant product for those details.

What is my personal information used for?

Your adviser will collect your personal details and conduct an analysis of your overall situation including investment needs, objectives and personal financial information before providing any advice. If you do not provide the personal information requested, we may not be able to provide you with the financial services you require.

Accessing and updating your personal information

If you have concerns about the accuracy or completeness of the personal information we hold, you may request to access your personal information by contacting your adviser.

The Privacy Policy

We are committed to protecting your privacy. Your personal information will be handled in accordance with our privacy policy. This document outlines how the information we collect from you is used, stored and disclosed. A copy of our privacy policy will be provided to you and can also be obtained from our offices or from our website.

Anti-Money Laundering and Counter-Terrorism Financing Act 2006

Capstone has an obligation under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 to verify your identity and the source of any funds. Accordingly, we may ask you to provide particular identification documents such as your passport or driver's licence.

Compensation arrangements

Capstone has and continues to maintain Professional Indemnity Insurance in accordance with the Corporations Act 2001. Our Professional Indemnity Insurance, subject to its terms and conditions, provides indemnity up to the sum insured for Capstone and our authorised representatives/employees in respect of our authorisations and obligations under our Australian Financial Services Licence. This insurance will continue to provide such coverage for any authorised representative/representative/employee who has ceased work with Capstone for work done whilst engaged with us.

If you have a complaint

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

- Contact your adviser and tell your adviser about your complaint. Alternatively, you may lodge your complaint with Capstone by either, contacting our Professional Standards Team on 03 8622 0700 (Toll Free on 1300 306 900), in writing to us at Level 1, 607 Bourke Street, Melbourne VIC 3000, via email at compliance@capstonefp.com.au or on Capstone's social media. We will try and resolve your complaint quickly and fairly.
- Capstone is a member of the Australian Financial Complaints Authority Limited (AFCA). If you feel our response is inadequate or if you have not received a response within 30 calendar days of submitting your complaint, you have the right to complain to AFCA. They can be contacted on 1800 931 678, you can submit an online complaint form available at www.afca.org.au, or you may write to them at info@afca.org.au or GPO Box 3, Melbourne VIC 3001. This service is provided to you free of charge.
- Further information about Capstone's Complaints Policy can be found on Capstone's website.

The Australian Securities and Investments Commission (ASIC) also has an Infoline: 1300 300 630 which you may use to make a complaint and obtain information about your rights. If you have concerns involving ethical and professional conduct, you may consider raising your concerns with the Financial Planning Association of Australia (FPA). They can be contacted on 1300 626 393 or you can write to them at GPO Box 4285, Sydney NSW 2001.