

Navigator Australia Limited

14 November 2022

Financial Services Guide

This Financial Services Guide (FSG) is an important document that provides you with information about the financial services offered by Navigator Australia Limited (NAL) ABN 45 006 302 987, AFSL 236466 (also referred to in this FSG as 'NAL', 'we', 'us' or 'our'). We are required by law to provide you with certain information before we provide a financial service to you.

Please retain this document for your reference and any future dealings with us.

Not independent

We are a wholly owned subsidiary of Insignia Financial Ltd and part of the Insignia Financial Group of companies (Insignia Financial Group).

Purpose of this document

This FSG is designed to help you decide whether to use our financial services and products including our wrap and investment products. This FSG explains:

- who we are
- the financial services and products we may provide to you
- how we are paid and any conflicts that may exist
- details of how to get advice and give instructions
- details on how we protect your personal information
- how you can make a complaint about us
- what we can do and what we expect from you.

It also answers other important questions, including how to contact us and how you can access our dispute resolution procedures.

If you need more information about anything covered in this document, please contact us. Our contact details are at the end of this FSG.

The financial services we provide

The financial service we provide is dealing in financial products issued by us or another company in the Insignia Financial Group. Also, as a platform service provider, we may acquire and otherwise deal with financial products issued by companies both within and outside the Insignia Financial Group on your behalf.

Actuate Alliance Services Pty Ltd¹ (a related party of Insignia Financial Group) provides general advice on financial services and products by some companies within the Insignia Financial Group including NAL.

We do not generally provide advice about financial products issued by companies that are not related to us, except to the extent that we need to investigate another financial product in order to advise whether an Insignia Financial Group product is appropriate for you.

Other documents you may receive

If you use a financial adviser, you are entitled to receive a Statement of Advice (SoA) on the first occasion they provide you with personal advice.

Before a financial adviser provides you with any personal financial advice they will collect certain personal information about you, your objectives, financial situation and needs.

The SoA will contain the advice, the basis of the advice, including information about fees, payments and associations they have that may influence the advice provided to you.

Copies of all advice documents will be retained on your client file and you may request a copy by contacting your financial adviser.

Disclosure documents

Our Product Disclosure Statements (PDS) or Investor Directed Portfolio Service Guides (Offer Document) are made available online.

The PDS or Offer Document will help you make an informed decision about whether or not to acquire or continue to hold the product. The PDS or Offer Document will contain information about the features, costs, risks and benefits of the financial product.

General advice

Our Financial Coaches may also give you general advice which does not take into account your particular financial situation, needs or objectives. Our Financial Coaches operate through Actuate Alliance Services Pty Ltd, a related party. You should assess your own circumstances and obtain and consider a copy of the PDS or Offer Document before making an investment decision.

If you visit our website or contact our ClientFirst Team, you will receive general advice.

Who provides the financial service?

NAL provides the financial services described in this FSG to you directly.

NAL is authorised to provide these financial services under its Australian Financial Services Licence No. 236466.

NAL is authorised to advise and deal in a range of financial products including:

- Deposit and payment products
- Derivatives
- Investment life insurance and life risk products
- Interests in managed investment schemes (including investor directed portfolio services)
- Securities
- Standard margin lending facility; and
- Superannuation products.

Remuneration

Any of the below payments are made as agreed with you or to the extent permitted by law.

How are we paid?

How we are paid will vary depending on the nature of the financial service we provide to you.

If you invest in a product we offer, we will receive remuneration in relation to your investment in that product. The remuneration we will receive for the products we offer is set out in the PDS or Offer Document for the particular product.

Remuneration for employees

Employees of the Insignia Financial Group are paid a salary. They may also be eligible for performance bonuses related to their overall performance which may include quality of advice provided to clients.

Any performance bonus our employees receive will not affect the level of fees charged on your investments. Performance bonuses are paid by us and are not charged to your investment account.

Our employees are not entitled to receive commissions.

Referral arrangements

In any instance you require advice beyond the scope of which we can provide, we can refer you to a suitably qualified professional.

Related parties

NAL is part of the Insignia Financial Group comprising Insignia Financial Ltd ABN 40 100 103 722 and its related bodies corporate (Insignia Financial Group).

Related entities may receive payment for administration, management, information technology and other services provided to us.

Entities owned by the Insignia Financial Group may be the responsible entity for investment options available through our products and may receive and retain fees in connection with these products. Fees payable for these investment options are set out in the relevant disclosure document. These companies include:

- Antares Capital Partners Limited ABN 85 066 081 114, AFSL 234483
- IOOF Investment Services Ltd ABN 80 007 350 405, AFSL 230703
- MLC Investment Limited ABN 30 002 641 661, ASFL 230705
- Navigator Australia Limited ABN 45 006 302 987, AFSL 236466
- One Path Funds Management ABN 21 003 002 800, AFSL 238342

In addition, you may choose to receive advice in relation to the products we offer from a Financial Adviser or Financial Coach who is associated with the Insignia Financial Group. Details of these groups can be found at <https://www.insigniafinancial.com.au/about-us/our-brands/financial-advice>. Any remuneration paid to your Financial Adviser or Financial Coach will be set out in the Financial Services Guide that your adviser provides to you.

Please refer to the PDS or Offer Document of the relevant product for more information.

Managing conflicts of interest

We have policies in place that contain measures to identify and manage conflicts when appointing related parties. These policies also apply to the investment selection process. The same selection process is applied in selecting both related and unrelated investments to the menu.

Your questions answered

Will NAL provide personal financial advice which is suited to my personal situation, needs, goals and objectives?

NAL does not provide you with personal financial advice.

If you require personal advice (ie. advice which considers your personal objectives, financial situation and needs) rather than general advice our Financial Coaches may refer you to a financial adviser within the Insignia Financial Group network. The financial adviser may charge you fees for their services. They are required to disclose and have you consent to those fees before they provide any personal advice to you.

What compensation arrangements do you have in place?

Financial Services Licensees who provide financial services to retail clients are required to have arrangements for compensating those persons for loss of damage suffered because of breaches of relevant legal obligations by a licensee or its representatives.

We have compensation arrangements in place, including professional indemnity insurance cover that is adequate for the type of financial services we provide and also for any potential liability arising from compensation claims. These arrangements comply with the *Corporations Act 2001* (Cth).

How do I provide you with instructions?

You can generally choose how you would like to give us instructions by logging into your account, in writing, by telephone or email. In some cases, the way in which you give us instructions may be limited by law or by particular product features.

How do we protect your personal information?

We are committed to maintaining the privacy and security of your personal information.

As a financial service provider, we are obligated to verify your identity and the source of any funds. Accordingly, we will ask you to present identification documents, such as, your passport and driver's licence, which we will hold on your file.

We collect, use and/or disclose your personal information primarily to provide you with the products and services that you request. We may also use your information for the following related purposes:

- To help your financial adviser provide you with financial advice and ongoing services in relation to your account with us.
- To facilitate internal administration, accounting, research, risk management, compliance and evaluation of Insignia Financial Group products and services.
- To establish and maintain insurance protection that you may request.
- To provide you with information about other products and services that we or other members of the Insignia Financial Group offer that may interest you.

In connection with providing our services to you, we may disclose your information to external parties, including:

- your financial adviser
- banks or other financial institutions
- insurers and reinsurers and their claims agents and assessors
- superannuation trustees, product issuers, legal and accounting firms, auditors, mail houses, contractors, or other service providers
- the Australian Taxation Office
- the Australian Securities and Investments Commission
- other companies within the Insignia Financial Group.

We may also collect and disclose your personal information when required or authorised to do so by law.

It is generally unlikely that we will disclose your personal information to overseas recipients. However, any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient of your personal information complies with Australian privacy law. Should your financial adviser utilise an overseas service provider, these arrangements will be detailed in their Financial Planner Profile.

Your personal information will be handled in accordance with our Privacy Policy which outlines how we collect, use, store and disclose your personal information. For more information, including how to access or correct your personal information, or how to complain about a breach of the Australian Privacy Principles, please read our Privacy Policy which can be accessed on our website at insigniafinancial.com.au/privacy-policy or by contacting:

By mail: Privacy Officer
Navigator Australia Limited
GPO Box 4341 Melbourne VIC 3001

By email: privacy.officer@insigniafinancial.com.au

By phone: 1800 913 118 (ClientFirst Team)

What if I don't want advice?

If you do not wish to receive any advice, we can carry out your instructions, but you must accept the risk that the financial product you select may not be appropriate for you.

What if I have a complaint?

If you have a complaint, we can usually resolve it quickly over the phone on 1800 913 118.

If you would prefer to put your complaint in writing, you can mail us at CustomerCare@insigniafinancial.com.au or send a letter to:

Customer Care: Navigator Australia Limited
GPO Box 4341
Melbourne VIC 3001

You can also lodge a complaint with AFCA if you are not satisfied with our response or if your complaint has not been resolved within 30 days.

Australian Financial Complaints Authority (AFCA)

We'll conduct a review and provide you with a response in writing. You have the option of lodging a complaint with the Australian Financial Complaints Authority (AFCA) directly rather than lodging a complaint with us. You can also lodge a complaint with AFCA if you are not satisfied with our response or if your complaint has not been resolved within the maximum time frame prescribed by ASIC's Regulatory Guides (RG 271). AFCA provides an independent financial services complaint resolution process that's free to consumers. You can contact AFCA in the following ways:

Website: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (Free call)

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

Time limits may apply to complain to AFCA 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.

For more information on our complaints management policy visit www.ioof.com.au/contact-us/complaints/.

How do I contact you?

You can contact us by:

- calling our offices on 1800 913 118
- visiting our website at ioof.com.au
- writing to us at GPO Box 4341, Melbourne VIC 3001.

Our registered office is at Level 1, 800 Bourke Street, Docklands VIC 3008.