



Financial Services Guide

Who we are, what we do and how we charge

Purpose of this document

This Financial Services Guide (FSG) is issued by bdhSterling Limited and bdhSterling AFSL Pty Ltd (collectively known as bdhSterling).

It provides you with information to help you decide whether to use the financial services we offer.

This FSG outlines the following:

- * bdhSterling is responsible for the financial services provided by its Representatives
- * The financial services and products bdhSterling and its Representatives can offer to you
- * How we (and other related persons) are remunerated for these services
- * Details of our internal and external complaints handling procedures
- * Our expectations of you and how you may instruct us

Please read the document in full, should you have any queries regarding the information provided please ask – we are here to assist you.

Who is bdhSterling?

bdhSterling is a global financial planning business, focused on assisting our clients understand and plan for their financial future. We provide personalised advice to our clients to ensure that their needs are prioritised. We partner with our clients to assist them in navigating the management, growth and protection of their financial goals and assets throughout their life.

We are committed to superior service delivery and the highest standards of professional conduct. The bdhSterling regulated companies are responsible for the conduct and advice provided by their Representatives in their relevant jurisdictions. We have outlined below what services or products may be offered under each jurisdiction.

We have a team of specialists in both jurisdictions enabling us to provide our clients with seamless service regardless of where they are located and the type of advice they need at the time. The Australian based Advisers are employees of bdhSterling Pty Ltd (a Corporate Authorised Representative No 462704 of bdhSterling AFSL Pty Ltd). bdhSterling AFSL Pty Ltd and bdhSterling Pty Ltd and bdhSterling Ltd are wholly owned subsidiaries of bdhSterling Group Ltd.

Details of our team are available on our website inclusive of any registration details.

If you have a question or concern about any aspect of our services please contact us at:

Telephone: +44 1372 724 249

Email: enquiries@bdhsterling.com

Website: www.bdhsterling.com

Post: bdhSterling Ltd, Capitol Square, 4-6 Church Street, Epsom, Surrey, KT17 4NR

Our website has contact details for all our Australian offices. Our principal office in Australia is in Perth:

Telephone: +61 8 6180 2555

Post: bdhSterling AFSL Pty Ltd, 28 The Esplanade, Perth, WA, 6000, Australia

How are we regulated?

bdhSterling is comprised of two regulated financial service practices, who are authorised by the incumbent regulator in their jurisdiction.

In the UK, bdhSterling Limited, is regulated by the Financial Conduct Authority (FCA) (FCA No. 499460) and has been since 22 July 2009.

In Australia, bdhSterling AFSL Pty Ltd (ABN 17 054 918 295), is regulated by the Australian Securities and Investment Commission (ASIC) and is the holder of an Australian Financial Service Licence No. 222266 and has been since 15 August 2002.

What services do we offer?

bdhSterling and its Representatives offer services to meet our clients' broad financial planning requirements throughout their various stages of life – that is, we are a holistic planning business. Whilst we offer holistic planning, we are also uniquely placed to offer specialist Cross Border (Financial) Solutions such as UK pension transfers.

Our unique ability to integrate an unparalleled range of financial services, with licensed UK and Australian Advisers, allows us to meet our clients' varied needs.

The regulatory framework in each jurisdiction is similar in intent but does differ in relation to the scope of financial services/financial products that an authorisation covers. The table on the following page is to assist you in understanding the services/financial products that are offered in each jurisdiction.

Financial Services	United Kingdom (FCA)	Australia (AFSL)
Holistic Financial Planning	Yes	Yes
Pension transfers, conversions and opt-outs from a UK scheme with safeguarded benefits. These schemes are typically referred to as defined benefit (DB) pension schemes or final salary pension schemes	Yes	Yes, in conjunction with UK entity
Transfers from defined contribution, or money purchase, schemes that do not have a safeguarded benefit.	Yes	Yes, in conjunction with UK entity
Savings and cashflow management	Yes	Yes
Wealth creation	Yes	Yes
Asset protection strategies	Yes	Yes
Investment strategies	Yes	Yes
Pre-retirement planning	Yes	Yes
Post-retirement planning	Yes	Yes
Self-managed superannuation funds		Yes
Estate planning	Yes	Yes
Financial Products		
Basic and non-basic deposit products	Yes	Yes
Superannuation & Retirement savings Account	Yes	Yes
Government debentures, stocks and bonds	No	Yes
Investment life and life risk insurance products	Yes	Yes
Securities, stocks	No	Yes
Managed investment funds	Yes	Yes

We will not provide advice on classes of financial products other than those detailed above.

bdhSterling supports your bdhSterling Adviser by providing access to financial product research conducted by external researchers. This assists your Adviser in selecting products that will help you reach your financial goals. We will also consider relevant Corporate Actions, and if in your interests and aligned with your personal strategy, we will advise you accordingly.

In the UK, we do not provide advice in relation to individual share holdings. If this is something you need assistance with, we can refer you to a stockbroker.

We do not provide advice on options, futures and other derivative contracts as we believe that these are unlikely to be suitable for our clients.

Unless we tell you otherwise, we will treat you as a retail client for investment business. This means that you are given the highest level of protection available under the UK and Australian regulatory system.

Our Advice Process

People seek financial advice for many different reasons so it is important that we understand exactly who you are and what you want to achieve. bdhSterling is obligated to act in your best interest, and this requires the advice provider to collect all required information about your financial situation and needs and objectives, make inquiries into the information provided, and investigate appropriate products and strategies that will meet your needs and objectives.

Whatever financial decisions you have to make, the first step towards making the right decisions is to establish a clear understanding of your financial needs.

We will take the time to understand your lifestyle, your ambitions, your key life transitions and, where relevant, the same for those close to you. We will understand your assets, investment/savings, income, and expenses before mapping a financial plan. The aim of this is to meet your goals at each stage and ensure you have protection should something unforeseen happen.

We also help you with key financial decisions. This usually means working with you on an ongoing basis which would involve an ongoing review, relevant adjustments and monitoring your full financial plan and scenarios.

We believe in providing cohesive advice across jurisdictions where required. We aim to look at your overall financial resources and help you achieve your life and financial ambitions.

To provide advice that is in your best interests bdhSterling needs to find out your individual investment objectives, financial situation and needs before we recommend any investment or risk products to you.

We expect that you will provide us with accurate information, so that we have a reasonable basis on which to provide you with advice. You have the right to withhold personal information, but this may compromise the effectiveness of the advice you receive or whether we can provide any advice. If you do not wish to provide this information, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully.

We expect that, where appropriate, you inform your adviser of any changes that may influence your future objectives.

From time to time, where the advice provider cannot recommend any appropriate products or where the advice provider feels your best interest will not be served by him/her, the advice provider has a right to refuse provision of advice or services.

Our advice will be provided in writing

When we provide personal financial advice, we will provide this in writing. Depending on the jurisdiction you are located in, or service you have engaged us to provide, the type of advice document you receive may differ. Personal financial advice is advice that considers one or more of your objectives, financial situation and needs. Each advice document will contain the advice, the basis on which it is given, and information about fees and charges, and any associations, which may have influenced the advice.

Should the services you engage us for be in relation to a UK pension transfer you will receive a Pension Transfer Analysis Report (PTAR) which will be prepared by our pension transfer specialist team in the UK.

Personal advice prepared and delivered in Australia will be set out in a Statement of Advice (SOA) initially, however ongoing advice may be documented in a shorter form Record of Advice (ROA) where there has not been any significant changes to your personal circumstances of the advice being provided.

To invest in a recommended financial product, you must complete the application form attached to the relevant Product Disclosure Statement (PDS). The PDS contains information about the product and will assist you in making an informed decision about that product. Depending on the nature of the financial product, there may be a 14 day cooling off period. However, this will be advised at the time of recommendations being made.

We will only implement advice with your written authority. It is important to us to know that you have understood the recommendations, therefore we request that you ask any questions you may have before you provide your authority.

Other information we require from you

As a financial service provider, we have obligations under both jurisdictions to mitigate potential financial crime and money-laundering activity. This requires us to verify your identity and the source of any funds. This means that we will ask you to present identification documents, such as passport and driving licence. We may use electronic identity verification systems and we may conduct these checks from time to time throughout our relationship, not just at the beginning. The check may leave a 'footprint' on your credit file, but it will not affect your credit rating.

We will also retain copies of this information. We assure you that this information will be held securely. We cannot provide you with transactional services if you are unwilling to provide this information.

Independence of Advice

Our respective jurisdictions vary in their view in relation to determining whether advice is independent or not. In Australia we are **not considered to be independent** on the basis that we do receive commissions on insurance products and that we do not offer every product option available that we are authorised to provide services in.

In the UK, we are considered to offer independent investment advice as we proactively consider a wide range of financial strategies and products, are not aligned to any product provider and periodically monitor the market for alternative options.

In both jurisdictions, where we recommend particular investment strategies and products to you, these will be selected based on your personal circumstances, financial goals and objectives. We will consider a number of factors, including the services that you need, the cost of investing, how much risk you are prepared to accept in an investment product and how much of a drop in its value you could withstand. All products recommended will be subject to our research processes prior to recommendation.

Legal and accounting advice

We are not qualified to provide legal or accounting advice or to prepare any legal or accounting documents. This means that the onus is on you to refer any point of law or accountancy that may arise during the course of discussions with us, to a solicitor or accountant. Please note that we are registered in Australia to provide incidental tax advice/implications when recommending Australian financial products and strategies.

How we charge for our services

It is important to us that you understand the costs associated with the delivery of our services. We undertake to provide you with an indication of costs prior to you engaging us to deliver a particular service. As the nature and complexity of our services do differ, we utilise a number of different charging methodologies and apply these as appropriate to the engaged services.

These include the following:

- * Flat fee: This is typically in relation to provision of advice and compilation of an advice document
- * Establishment and implementation fee: Receiving advice is the initial step but a considerable amount of work goes into the implementation of the advice itself, whether this is establishing investment structures or undertaking transactions such as purchase of financial products via a third party. The costs of establishment and implementation of advice will be outlined in your advice document
- * Percentage of the amount invested: The ongoing management of your financial assets, including adjustments to strategy, review of portfolio holdings and benchmarking to your risk appetite and overall financial objectives may be based on the amount of funds under management, which is used as a measure of the work involved
- * Based on an hourly rate: Where work is carried out for a client, which does not fall into the normal range of services for which fees have been set, then the work will be carried out at an hourly rate; this rate will be provided upfront before any work is undertaken
- * Commission: We may receive commission in relation to the placement of life insurance products. The rate of commission is generally capped and is paid to us by the insurance company. Any commissions will be fully disclosed to you in the relevant advice document.

Combination of some or all of the above - depending on the scope of services we are providing you; the charging methodology may include some or all of the charge types above. Rest assured though, you will be advised of any charges prior to engaging our services. In the case of UK DB pension transfer advice, our initial and ongoing charges will be confirmed, in pounds and pence, in our separate **Personalised Charges Communication**.

To provide a personalised charging document, a cash equivalent transfer value (CETV) will be required.

Depending on the services we provide, there may be costs and charges (including taxes), not charged by us, but related to the financial products we arrange for you. These charges may be one-off charges (payable up front) or charges payable on an ongoing basis. For example:

- * Investment costs: These are the costs relating to the manufacturing and managing of your investments – for example, fees charged by the investment fund manager, costs relating to investment transactions
- * Service costs: If your investments are held on a platform the platform provider will make a charge for administering/managing your investments.

We will always disclose any third-party costs as part of making our recommendations. Before we provide you with our advice, we will add together all the costs and charges payable (including third party costs) so you're able to understand the overall costs of our services and recommendations. This is referred to as aggregated costs and charges information.

Other benefits

bdhSterling may, from time to time, receive a benefit from preferred product providers by way of sponsorship of educational seminars, conferences, or training days. Other benefits, such as prizes, awards and hospitality events (e.g. sporting events) may also be received.

Details of benefits between \$100 and \$300 will be maintained on a Register. Benefits over \$300 are not allowed to be accepted.

You have a right to request for further information in relation to the remuneration, the range of amounts or rates of remuneration, and soft dollar benefits received by the licensee and/or authorised representative.

Relationships which may influence the service or advice we provide

bdhSterling is not owned by any Fund Manager or Institution and there are no product relationships that will influence the advice that you receive from them.

Your adviser may hold an interest in a financial product. Any significant interest/ownership will be recorded in a register of financial product holding and, where material, this holding will be disclosed to you in the SOA or ROA.

bdhSterling may outsource SMSF administration services to the following third-party administrator:

- * bdhSterling SMSF Tax Pty Ltd

Information may only be shared between our related companies and service providers to facilitate the services we provide.

What information do we maintain in your file?

We maintain a record of your personal profile that includes details of your investment objectives, financial situation and needs. We also maintain records of any recommendations made to you. If you wish to examine your file, you should ask us and we will arrange for you to do so.

We are committed to implementing and promoting appropriate controls, which will ensure the privacy and security of your personal information. Should you require additional information please contact us for a copy of our Privacy Policy.

Additional peace of mind / compensation arrangements

The Financial Services Compensation Scheme (FSCS) is the UK's statutory compensation fund for customers of authorised financial services firms who are unable to pay claims against them, usually because they have gone out of business.

You may be able to claim compensation from the FSCS if we cannot meet our obligations. The amount of compensation available will depend on the type of business and the circumstances of the claim. We can provide more specific information on request, but as a guide:

- * Investments: Eligible claims for most types of investment business are covered for up to 100% of a claim up to a maximum of £85,000 per person per firm
- * Insurance: In the majority of cases, eligible claims about the advising and arranging of protection products are covered for 90% of the claim, without any upper limit.

Further information is available from the FSCS at www.fscs.org.uk.

In Australia, bdhSterling confirms that it has arrangements in place to ensure it continues to maintain Professional Indemnity insurance in accordance with s.912B of the Corporations Act 2001 (as amended). Our Professional Indemnity insurance, subject to its terms and conditions, provides indemnity up to the Sum Insured for bdhSterling and our 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 representative/employee, who has ceased work with bdhSterling for a minimum of 7 years from the date of ceasing the relationship providing coverage is available.

What should you do if you have a complaint?

If you are unhappy with our advice or any aspect of our services, we encourage you to contact us as soon as possible.

We are committed to providing quality advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms for our clients.

If you have any complaint about the service provided to you please contact your adviser or email us at complaints@bdhsterling.com. Alternatively, our UK office address can be found at the end of this document and details of all our office locations are on our website.

Your complaint will be reviewed by our relevant Complaints Officer and should we not resolve it satisfactorily you will be advised on how to escalate your complaint to an independent external body.

Should our internal complaints processes not meet your requirements we are also members of an External Dispute Resolution Scheme in each jurisdiction and abide by their terms and conditions.

For UK services, the Financial Ombudsman Service (FOS) may be able to help. The FOS settles disputes between financial services business and their clients. Full details are available at www.financial-ombudsman.org.uk.

For Australian based services you can lodge a complaint with a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Full details are available at <https://www.afca.org.au/> You are also able to contact them by email at info@afca.org.au; by telephone on 1800 931 678 (free call); or by writing to them at Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001.

The Australian Securities & Investments Commission (ASIC) also has a free call Infoline on 1300 300 630, which you may use to make a complaint or obtain information about your rights.