

# Financial Services Guide

Version number 24.00  
15 December 2023

## The purpose of this Financial Services Guide

This Financial Services Guide (FSG) has been authorised for distribution by the authorising licensee, Count Financial Limited ABN 19 001 974 625, Australian Financial Services (AFS) Licence no. 227232 ('Count').

Count is the AFS Licensee that authorises your Count 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 Count 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 Count.

## Part One

Part One of this FSG provides information about:

- Count 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 Count, 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

Count 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

Count 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.

#### Count's Approved Product List (APL)

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

Count utilises Lonsec Research as a primary research provider for the construction of Count'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 Count's APL.

Count 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 Count's authorised representatives, participating product issuers may also have products included on Count's APL. For more information on Count's APL, refer to 'Approved Products', in section 3, below.

## Contacting Count

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

Writing:	Count Financial Limited GPO Box 1453 Sydney NSW 2001
Phone:	1300 650 432
Email:	info@count.au

## 1. About Count

Count's purpose is to help Australians afford their dreams. Count educates clients and help 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's relationship with Count Limited

Count is a subsidiary of Count Limited ABN 111 26 990 832 ("Count Limited"). Count Limited owns 85% of the shares in the Licensee and Count Member Firm Pty Ltd ACN 633 983 490 owns the remaining 15% of the shares in Count. Count Limited has subsidiaries and associates that provide accounting and financial advice services. Many of the Count Limited subsidiaries and associates that provide financial advice services do so as authorised representatives of Count.

## 2. 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.

## 3. 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

Count'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 Count APL.

All products included on the Count 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 Count APL. If this occurs, any product recommended by your Adviser must still meet Count'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 Count is not responsible for

Count is only responsible for those financial services or products offered by your Adviser in their capacity as an authorised representative of Count. 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 Count.

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 Count .

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.

## 4. Remuneration that we or Count may receive

All advice fees, including non-advised fees, and commissions must be paid directly to Count as the licensee. Count 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 Count will receive will be no more than 77% of the increase in premium. The ongoing commission that Count 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 Count will receive will be no more than 66% of the increase in premium. The ongoing commission that Count 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 Count 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 Count 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 Limited, Count 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 Count'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 Limited may receive up to 17.5% of the annual software licence fee.
- SUPERCentral is Count's preferred third-party service provider for preparing trust deeds. In situations where you utilise their services, Count receives between 25% and 46% of revenue that SUPERCentral receives as a result of the referral.
- Count also has a referral arrangement in place with Townsends Business and Corporate Lawyers (Townsends). If you use the services of this provider as a result of a referral from us, Count will receive up to 10% of the invoice payable by you to Townsends. This is not an additional cost to you.

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

#### **Count Member Firm Trust**

Your Adviser is employed by a Corporate Authorised Representative (CAR) of Count and may also be a shareholder in that entity. This CAR may be a

beneficiary under a discretionary trust pursuant to which Count Member Firm DT Pty Ltd holds the assets of that trust being the shares in Count Member Firm Pty Ltd. Count Member Firm Pty Ltd owns 15% of Count. Whether the CAR receives any benefits depends on meeting specific criteria including financial and compliance standards.

#### **Fee rebate or waiver**

Count, 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 Count to its authorised representatives, including expenses such as annual membership fees, software and data service fees, paraplaning 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 its authorised representatives.

#### **Safeguards Adopted**

Count 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.

### **5. Complaints, privacy and compensation arrangements**

#### **How we handle your personal information**

Count 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, Count has adopted the principles set out in the Privacy Act 1988. For further details you can refer to Count's Privacy Policy, available at:

[www.count.com.au/privacy](http://www.count.com.au/privacy)

If you wish to review your personal information held by us, please contact your Adviser directly, or Count by emailing [info@count.au](mailto: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 Count Complaints Manager

If your complaint is not resolved by your Adviser to your satisfaction, or if you would prefer to contact Count 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 Count complaints manager who will aim to resolve your complaint quickly and fairly and will communicate a proposed solution to you. Count will try to resolve complaints as quickly as possible, and in any event within 30 days of receipt of your complaint. Count will let you know if it needs more time to finalise your complaint.

Writing:	Count Complaints Manager GPO Box 1453 Sydney NSW 2001
Phone:	1300 650 432 (option 2)
Email:	<a href="mailto:reportcomplaints@count.au">reportcomplaints@count.au</a>

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

If you remain dissatisfied with the outcome provided by our, or Count'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:	<a href="http://www.afca.org.au">www.afca.org.au</a>
Phone:	1800 931 678 (free call)
Email:	<a href="mailto:info@afca.org.au">info@afca.org.au</a>

### Our compensation arrangements

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

Count'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 Count's behalf.





# Kirby Financial Solutions Financial Services Guide

ACN: 621 804 448 | Authorised Representative No: 1260097

Version number: 24.00

## PART TWO – ADVISER PROFILE

This adviser profile is Part Two of the Count Financial Limited (Count) Financial Services Guide (FSG) **15<sup>th</sup> December 2023** and should be read in conjunction with Part One of our FSG dated 15<sup>th</sup> December 2023. Together these documents form the complete FSG.

**AB Clements Pty Ltd trading as Kirby Financial is an Authorised Representative of Count Financial Limited (Count Financial).**

The individual(s) listed in this FSG are authorised by Count Financial to provide personal advice through AB Clements Pty Ltd.

### Our contact details:

Office Address: **157 Commercial Street East, MOUNT GAMBIER, SA, 5290**

Postal Address: **PO Box 3032, MOUNT GAMBIER, SA, 5290**

Phone: **(08) 8723 2744**

Email: [admin@kirbyfinancial.com.au](mailto:admin@kirbyfinancial.com.au)

Website: [www.kirbyfinancial.com.au](http://www.kirbyfinancial.com.au)

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### Andrew Clements

**Authorised Representative Number: 001 268 407**

Andrew is an Authorised Representative of Count Financial and a director of AB Clements Pty Ltd. He receives distribution from the AB Clements Pty Ltd ATF Clements Family Trust.

Andrew has over 20 years of experience in the provision of accounting advice and 3 years' experience in the provision of financial planning advice. Andrew attained the **Graduate Diploma of Financial Planning** from Kaplan Education on 15<sup>th</sup> May 2018. He is a Member of CPA Australia and a Registered Tax Agent.

Andrew has specialist accreditations to provide advice regarding **Self Managed Superannuation Funds** and **Defined Benefit & Untaxed Government Super Schemes**.

#### Financial services and product types

Andrew is authorised to provide advice in the following areas:

- Deposit and payment products
- Life products
- Retirement Savings Accounts
- Margin Lending
- Government debentures, stocks and bonds
- Managed Investment Schemes
- Securities
- Superannuation

How to contact Andrew: [admin@kirbyfinancial.com.au](mailto:admin@kirbyfinancial.com.au)

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### Annie Harris

**Authorised Representative Number: 000 330 312**

Annie is an Authorised Representative of Count Financial and an employee of AB Clements Pty Ltd, and receives a salary only.

Annie has over thirteen years of experience in the provision of financial planning advice. Annie attained the **Graduate Diploma of Financial Planning** from FINSIA on 1<sup>st</sup> November 2008. Annie is a Financial Planner AFP® Member of the FAAA.

Annie has specialist accreditations to provide advice regarding **Self Managed Superannuation Funds, Aged Care** and **Defined Benefit & Untaxed Government Super Schemes**.

#### Financial services and product types

Annie is authorised to provide advice in the following areas:

- Deposit and payment products
- Life products
- Retirement Savings Accounts
- Margin Lending
- Government debentures, stocks and bonds
- Managed Investment Schemes
- Securities
- Superannuation

How to contact Annie: [admin@kirbyfinancial.com.au](mailto:admin@kirbyfinancial.com.au)

<b>Advice preparation and implementation fees</b>	<p>Prior to the provision of personal advice, we will agree upon a preferred payment option and disclose how our fee is calculated. Below is a summary of our available payment options that can be combined to pay for our services. We will provide you with a quote for our services before we undertake any work on your behalf.</p> <p>These fee options include:</p> <p><b>Time based charging</b></p> <p>The fee for the preparation and implementation of our advice is calculated based upon the time we spend developing the plan. Our hourly rate is <b>\$275 per hour (incl. GST)</b>.</p> <p>Price can vary depending on scope and complexity of the advice and we will provide you with an estimate of the overall cost. If extra charges apply, then we will inform you before proceeding with any work.</p> <p><b>Service based charging</b></p> <p>The fee for the preparation and implementation of our advice is calculated based upon a fixed price agreement. This fixed dollar amount will vary based upon the complexity of advice being provided and agreed upon prior to commencement. Our minimum fee for this is <b>\$3,300 (incl. GST)</b>.</p> <p><b>If you decide not to implement our recommendations, the fee for the preparation of the Statement of Advice will be payable in full.</b></p> <p><b>Payment may be made by various methods including by cheque, direct debit or fee from investments (if allowable).</b></p>
<b>Supplementary service fees</b>	<p>For supplementary services, such as the provision of general research material or the completion of administrative tasks, our fee will be calculated on a time basis of <b>\$275 per hour (incl. GST)</b>.</p> <p><b>Where you enter into an Ongoing Service Arrangement, Supplementary services are included and will not be provided at an additional cost.</b></p>
<b>Ongoing &amp; Fixed Term service fees</b>	<p>Our ongoing advice fees vary depending on scope and complexity and start from <b>\$2,400 pa (incl. GST)</b>. The exact cost of the ongoing review service will depend on the review offering we recommend and this will be disclosed within the Ongoing Service Agreement we provide to you.</p> <p>We have attached the review packages to the end of this document.</p> <p>Should you require any additional services outside of any agreement between you and your adviser, an amount of up to <b>\$275 per hour</b> per hour may be applied.</p>
<b>Non-advised transaction fees</b>	<p>If we assist you on an execution only basis (i.e. where you have been offered and declined advice), an amount of up to <b>\$275 per hour</b> per hour will be applicable.</p>
<b>Other third-party payments we may receive</b>	<p>We may also receive the following fees, which are not payable by you.</p> <p><b>Stamping Fees</b></p> <p>Where we facilitate Share Placements and Initial Public Offers in relation to ASX-listed Direct Equities (i.e. Shares - this excludes Listed Investment Companies and Trusts), we may receive up to 1.5% of the transaction value as "stamping fees".</p> <p><b>Insurance Commissions</b></p> <p>Where we facilitate the acquisition, or modification of a Life Insurance product, we may receive commissions as described in Part 1 of this FSG.</p> <p>Where we provide advice in relation to the above transactions and charge an advice fee, we may choose to rebate part or all of the third-party payment, to you.</p>



## Kirby Financial Solutions

Office Address: **157 Commercial Street East, MOUNT GAMBIER, SA, 5290**

Postal Address: **PO Box 3032, MOUNT GAMBIER, SA, 5290**

Phone: **(08) 8723 2744**

Email: **[admin@kirbyfinancial.com.au](mailto:admin@kirbyfinancial.com.au)**

Website: **[www.kirbyfinancial.com.au](http://www.kirbyfinancial.com.au)**

## Our Review Service Package

Kirby Financial Solutions is committed to providing you with regular reviews and an ongoing service of professional advice and support. It is advisable that your investments and financial position be periodically reviewed to ensure that the qualities of products chosen to facilitate the recommended financial strategies are still appropriate for your needs and objectives.

### Ongoing Service

Offer of a review once per year and review if scheduled

At the specified frequency you will have the opportunity to receive a review of your financial plan. We will contact you to arrange the review meeting. You will need to respond to our contact in order for a review meeting to be scheduled.

If you would like to take up this opportunity before we have contacted you or at another time, you should contact us to arrange this review.

What is covered in a review depends upon what you would like to focus on, but here are some aspects that you may wish to request your Adviser to focus on:

- a reminder on your financial plan, a discussion on whether you have met your commitments under the financial plan to date, and an update on your progress towards achieving your financial goals;
- an update on the status of any previously agreed changes to your financial plan, services or additional advice and whether they have been implemented/provided;
- a discussion on whether your personal circumstances or goals have changed and any impact on your financial plan and its underlying assumptions;
- information on any changes to legislation and how they may impact your financial goals and whether we recommend you make any changes to your financial plan as a result;
- information on economic and market events and how they may impact your financial goals and whether we recommend you make any changes to your financial plan as a result;
- advice on whether your financial plan should be changed, what any recommended changes are and mutually agreeing them;
- an update on the performance of your investments;
- any recommended changes to investments and asset allocation based on performance, research or a change in your preferences or risk profile;
- whether it is appropriate for you to seek assistance from a third party to review wills or powers of attorney, or for tax planning;
- identifying and discussing other related issues such as whether it is appropriate for you to seek advice on new financial goals, estate planning or aged care strategies (which advice may then be separately arranged and which may be provided by me or someone else); and
- answers to any other questions you may have.

We may also choose to provide some of the above aspects throughout the year (e.g. information on changes to legislation and on market events, certain recommended changes to investments).

Rather than wait for the review, you can also contact us at any time during business hours to ask any questions about your financial plan or to enquire about other service or support you may require.