THORNTON

Financial Services Guide

Version 21

A guide to our Company and your Adviser – David Lolicato

This guide has been authorised by Thornton Group (Australia) Pty Ltd trading as Thornton Group

About this guide.

This Financial Service Guide (FSG) will help you decide whether to use the services that are offered by Thornton Group (Australia) Pty Ltd.

Before seeking our advice, you probably have a number of questions you would like to ask about Thornton Group (Australia) Pty Ltd (***Thornton Group***). You have the right to ask us about who we are how we can be contacted, the type of advice and services we provide, our fees and how we are paid for those services, how we manage private information and what you can do if you have a complaint about our services. Key information is set out in answer to the questions below. If you need more information or clarification, please ask us. This Financial Services Guide is issued with the authority of Thornton Group.

You should also be aware that you are entitled to receive a Statement of Advice (***SOA***) whenever we provide you with any advice which takes into account your objectives, financial situation and needs. The SOA will contain the advice, the basis on which it is given and information about fees, commissions and associations which may have influenced the provision of the advice.

If we provide you with further advice a Record of Advice (***ROA***) will be provided instead of an SOA if there have been no significant changes in your personal circumstances or the basis of the advice has not significantly changed since the last SOA was provided. We will keep a record of any further personal advice we provide you for 7 years. You may request a copy of these documents in writing during that period.

In the event we make a recommendation to acquire a particular financial product (other than securities) or offer to issue or arrange the issue of a financial product, we must also provide you with a Product Disclosure Statement or Investor Directed Portfolio Service (IDPS) containing information about the particular product which will enable you to make an informed decision in relation to the acquisition of that product. You should read any warnings contained in your advice document, the PDS or IDPS guide carefully before making any decision relating to a financial strategy or product.

Other Documents you may receive

If you enter into an Ongoing Service Agreement for a period greater than 12 months, we will seek your consent to renew our ongoing services, on an annual basis. The consent notification will contain information about the fees to be charged and services to be provided for the coming year.

Not Independent

Thornton Group (Australia) Pty Ltd receives commissions from life insurance products. As such we are not able to refer to ourselves as 'independent', 'impartial' or 'unbiased'.

Before you get our advice

Who is my adviser?

Your adviser is David Lolicato

David started in the finance industry in 1995 and holds a Bachelor of Commerce and is a Certified Practicing Accountant. He is also a SPAA Self-Managed Super Fund Specialist Adviser.

David can be contacted at Thornton Group on 08 8271 5144.

Who will be responsible for the advice given to me?

David Lolicato is an Authorised Representative (No 309 082) of Thornton Group (Australia) Pty Ltd. Thornton Group (Australia) Pty Ltd holds an Australian Financial Services Licence (No 223 670) and is responsible for the advice provided by its representatives. Thornton Group (Australia) Pty Ltd operates under the trading name Thornton Group.

Do any relationships exist which might influence the service or advice I receive?

The Directors and Shareholders of Thornton Group, have a financial interest in Thornton Group (SA) Pty ltd and may benefit by sharing in any profits.

From time to time your adviser may recommend you use the Self-Managed Super Fund administration and compliance services of Evolution Super, who are also owned by Thornton Group. Evolution Super pays Thornton Group a service fee for operational expenses.

You are free to engage your own preferred professionals. Where you are referred to a related entity by your adviser and take up the services of that business, your adviser does not receive any direct remuneration or benefit and the Directors of Thornton Group may benefit from by sharing in any profits from that entity.

Thornton Group have a referral arrangement with GPK accountants & Business Consultants (GPK). If GPK have referred you to Thornton Group for financial services and you take up those services, GPK may receive 15% of any revenue generated from those services. E.g., If Thornton Group make $1,000 in adviser fees and commissions, GPK will receive $150.

Adviser

Thornton Group operates their own Separately Managed Accounts (SMA) via the BT Panorama platform that may be recommended to you by your adviser if they are appropriate for your circumstances.

Thornton Group SMAs are offered in collaboration with Ascalon Capital Consultants as the asset consultant and Westpac appointed as the Responsible Entity. Ascalon Capital Consultants and BT Panorama receive fees for their involvement in our SMAs that will be disclosed to you in your Statement of advice or disclosure document if we recommend one of these accounts to you.

What advisory services are available to me under the authority of Thornton Group?

- Listed Securities advice;
- Superannuation and Rollover advice and strategies;
- Managed Funds;
- Deposit and payment products;
- Debentures, stocks or bonds issued or proposed to be issued by a government;
- Gearing Strategies;
- Standard Margin Lending;
- Life products, including investment life insurance and life risk insurance;
- Managed investment schemes including investor directed portfolio services;
- Managed investment schemes limited to MDA services;
- Centrelink advice;
- Estate Planning advice;
- Derivatives limited to old law securities options contracts and warrants;
- Retirement Savings Accounts ("RSA") products (within the meaning of the Retirement Savings Account Act 1997)

David is licenced to offer you all of the above advisory services as an Authorised Representative of Thornton Group (Australia) Pty Ltd with the exception of Managed investment schemes limited to MDA services and Derivatives limited to old law securities options contracts and warrants.

We will only recommend an investment to you after considering its suitability for your individual investment needs, objectives and financial circumstances. The products we recommend are all selected from an approved list of products carefully researched by independent research experts.

How will I pay for the service?

We choose to be flexible in earning our fees and offer you the flexibility to select the fee payment method most suitable to you.

For investment portfolio and strategy advice, Thornton Group offers fee for service for new clients. Existing service clients may have been offered a range of payment options and arrangements will be reviewed each year in the Annual Review conducted.

Please refer to the General Fee Schedule in this Financial Services Guide for more information regarding fees. Your adviser will explain these options to you and help you select the option that is most suitable for your personal situation.

When you get our advice

What do we expect from you?

We expect that you will provide us with accurate information that we request so that we can provide advice that is in your best interests.

Your adviser will give you advice that is suitable to your investment needs and financial circumstances.

However, to do so we need to find out your individual investment objectives, financial situation and needs before we recommend any investment to you.

You have the right not to divulge this information to us. In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully.

What should I know about any risks associated with the investments or investment strategies that my adviser recommends to me?

We will explain to you any significant risks of investments and strategies that we recommend to you and disclose them in the Statement of Advice. If we do not do so, you should ask us for further clarification.

What information do you maintain in my file and can I examine my 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 make arrangements for you to do so.

We will ensure the privacy and security of your personal information as per our Privacy Policy.

How can you provide us with instructions?

You can contact us directly with any instructions relating to your financial products. This includes giving us instructions by telephone, mail or email. We can only accept your instructions via email once you have signed an authority form.

Tax implications of our advice

Whilst we are registered as Qualified Tax Relevant Providers, we are not registered tax agents and only provide services directly related to the nature of the advice provided to you. Where tax implications are discussed, they are incidental to our recommendations and only included as an illustration to help you decide whether to implement our advice. We recommend you consult a registered tax agent to confirm your taxation position for matters beyond the scope of any advice provided.

What compensation arrangements are in place and are these arrangements complying?

Thornton Group 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). In particular our Professional Indemnity insurance, subject to its terms and conditions, provides indemnity up to the Sum insured for Thornton Group and our authorised representatives / 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 representatives / representatives / employees who have ceased work with Thornton Group for work done whilst engaged with us.

Privacy Policy

Thornton Group has a privacy policy. This policy is available upon request or may be viewed in full on our website at www.thorntongroup.com.au.

Anti Money Laundering

As a financial service provider, we have an obligation 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 passports and driver's licence. We will also retain copies of this information. We assure you that this information will be held securely.

If you have any complaints

Who can I speak to if I have a complaint about the advisory service?

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, you should take the following steps:

1. Contact your adviser and tell your adviser about your complaint.
2. If your complaint is not satisfactorily resolved with your adviser, please contact our Practice Manager of Thornton Group on (08) 82715144, or put your complaint in writing and send it to:
   Thornton Group - Att: Practice Manager
   182 Fullarton Road DULWICH SA 5065
   Email: tkelly@thorntongroup.com.au
   We will try and resolve your complaint quickly and fairly.
3. If we cannot reach a satisfactory resolution within 30 days, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers. They can be contacted either on 1800 931 678 (free call) or in writing to GPO Box 3, Melbourne VIC 3001, or you can email them at info@afca.org.au. Thornton Group is a member of this complaint's resolution service.

4. 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. Alternatively, you can email your complaint to infoline@asic.gov.au.

General Fee Schedule

(all fees inclusive of GST)

Following is a comprehensive list of all of the possible fees that Thornton Group charges for the provision of advice. Additional fees may also be charged depending on the product or products that you may invest in. These fees will be fully disclosed to you in the written Statement of Advice that will be provided to you at the time that specific product recommendations are made. Your Authorised Representative, David Lolicato, is paid a salary and may receive distributions from his shareholding in Thornton Group.

Initial Consultation – New Client

Free of charge

Statement of Advice (SOA) Preparation Fee

This covers the preparation of a written Statement of Advice. The fee is determined and agreed on prior to the commencement of the preparation of the SOA and is based on complexity.

We charge a minimum plan fee of $550 to a maximum plan fee of $5,500.

In addition to the plan fee, we may charge an Implementation Fee

An implementation fee may be charged to cover administration costs incurred in finalising the recommendations agreed upon.

We charge a minimum fee of $1,100 or up to 2.2% of your portfolio value. For example, if you invest $200,000 with us and we charge you an implementation fee of 1.1% we will receive $2,200.

Ongoing Advice Fee

We charge a minimum fee of $1,100 or up to 2.2% of your portfolio value depending on the complexity of your requirements. For example, if you invest $200,000 with us and we charge you an ongoing advice fee of 1.1% we will receive $2,200.

Other Fees

Direct Shares

Up to 1.10% per trade with a minimum of $88. E.g., If you invest $10,000 in direct shares and we charge 1.1% we will receive $110.

Risk Insurance

We are remunerated by way of brokerage from the relevant insurer. The brokerage paid to us is utilized to cover our ongoing administration, research costs, strategy and implementation costs in relation to the insurances we recommend. The brokerage is paid by the product provider and is not an additional charge to you.

Initial commission payable under an upfront structure will be capped at 66% and the ongoing commission under an upfront structure will be capped at 22%of the annual premium paid. Both initial and ongoing commission under a level structure will be capped at 37%. E.g., If your insurance premium was $1,000, we would receive an initial commission of up to $660 and an ongoing commission of $220 pa.

Centrelink Service

We can assist you with the completion, lodgement and ongoing updates to Centrelink on your behalf.

Application Fee $770

Renewal Fee p.a. $550

Hourly rates

Where appropriate, Thornton Group may elect (with your permission) to charge an hourly rate for its services.

Senior Financial Planner	$550	Financial Planner	$330
Adviser Assistant	$220		

Other Benefits

Soft Dollar Benefits

Thornton Group maintains a Soft Dollar Benefits register. Soft Dollar benefits means non-monetary payments received up to a limit of $300. Types of soft dollar benefits include but are not limited to educational and training support, information technology and software support. Should you wish to view this register at any point in time please speak with your Adviser.

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 representative.