

INTEGRO

# FINANCIAL SERVICES GUIDE

**VERSION 3.3**  
**5 SEPTEMBER 2020**

# INTEGRO FINANCIAL SERVICES GUIDE

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This Financial Services Guide has been authorised for distribution by the authorising licensee:

Integro Holdings (WA) Pty Ltd, (“Integro”)  
ABN 61612297739  
Australian Financial Services Licence No. 489444 (“AFSL”)  
38 Station Street, Subiaco Western Australia, 6008  
PO Box 258, Subiaco Western Australia, 6904  
Email: [goodadvice@integrowealth.com.au](mailto:goodadvice@integrowealth.com.au)  
Website: [www.integrowealth.com.au](http://www.integrowealth.com.au)

This Financial Services Guide (“FSG” or the “Guide”) provides you with important information about Integro Holdings (WA) Pty Ltd, (“Integro” or “Licensee”), and its Authorised Representatives, who will provide you with the financial services described in this Guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your financial adviser.

The Guide consists of two parts. Part 1 contains important information about:

- the financial services we offer as Authorised Representatives of Integro
- Integro as the holder of an AFSL
- the financial services that Integro offer
- the process we follow to provide financial services
- how we, our associates, and Integro are paid
- any arrangements that may influence our advice to you
- how we and Integro protect your privacy
- who to contact if you have a complaint or if you are not satisfied with the services provided.

Part 2 of this Guide is an Adviser Profile and includes information on the services we are authorised to provide on behalf of Integro.

References in this Guide to ‘me’, ‘I’, ‘us’, ‘we’ and ‘our’ should be read as either Integro or your ‘Authorised Representatives’ of Integro, as the context requires.

# PART 1

# FINANCIAL SERVICES GUIDE

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## THIS PART OF THE FSG CONTAINS THE FOLLOWING SECTIONS:

1. Financial Services Guide
2. Privacy Statement
3. Are you satisfied?

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG, which we, as Authorised Representatives, are required to provide.

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## ABOUT INTEGRO

Integro is a Perth-based financial planning firm established by Justin Gilmour in 2003 and is proud to serve a growing client base in Perth and regional Western Australia.

In partnership with you, our job is to help grow, manage and protect your wealth and plan strategies that will allow you to take control of your financial future.

We offer a uniquely personal financial experience, founded on trust, to build relationships with you and your family, with the aim of ensuring and securing each generation's financial wellbeing.

### Structure

Integro Holdings (WA) Pty Ltd ("Integro"), ABN: 61 612 297 739, holds an Australian Financial Services Licence (AFSL), Licence number 489444 issued by the Australian Securities & Investments Commission.

Mitford Investments (WA) Pty Ltd, as trustee for the JJG Trust trading as Integro Private Wealth (IPW), ABN: 96 816 853 855, is a corporate Authorised Representative of Integro Holdings (WA) Pty Ltd (AR Number: 1257302) and provides financial services under the Integro AFSL. Payment for these services are paid directly from Integro Holdings (WA) Pty Ltd to JJG Trust.

Justin Gilmour is the sole director of Integro Holdings (WA) Pty Ltd.

Justin Gilmour is the sole director of Mitford Investments (WA) Pty Ltd and also an Authorised Representative of Integro Holdings (WA) Pty Ltd.

Marshall Michael Wealth Management Pty Ltd (MMWM), ABN: 67 145 209 123, is also a corporate Authorised Representative (AR Number: 1257292) of Integro Holdings (WA) Pty Ltd, and provides financial services under the Integro AFSL. Payment for these services is paid directly from Integro Holdings (WA) Pty Ltd to Marshall Michael Wealth Management Pty Ltd.

Justin Gilmour is a director of Marshall Michael Wealth Management Pty Ltd, and owns 50 per cent of the company via Hatmour Pty Ltd as trustee for the Gilmour Family Trust, ABN: 74 790 292 415.

Justin Gilmour and Justine Gilmour are beneficiaries of the JJG Trust and the Gilmour Family Trust.

As the holder of an AFSL, Integro is responsible for the financial services we provide to you. Integro acts on its own behalf when these financial services are provided to you.

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## **PROFESSIONAL STANDARDS – FINANCIAL PLANNERS & ADVISERS CODE OF ETHICS**

In 2017 the Commonwealth Parliament amended the Corporations Act 2001, to raise the education, training and ethical standards of financial advisers and financial planners.

The Code of Ethics was developed, and the code seeks to impose ethical duties that go above the requirements of the law and it is designed to encourage and embed higher standards of behaviour and professionalism in the financial advice industry.

At Integro we welcome these changes and are committed to ensuring our advisers (authorised representatives) are offering all our clients a professional service and their advice is in the best interest of our clients at all times.

You can view the Code of Ethics at the Financial Adviser Standards and Ethics Authority (FASEA), <https://www.fasea.gov.au/code-of-ethics/>

# SECTION 1

## FINANCIAL SERVICES GUIDE

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### WHAT OTHER INFORMATION SHOULD YOU CONSIDER BEFORE DECIDING WHETHER TO PROCEED WITH OUR RECOMMENDATIONS?

If you receive personal financial advice, this will be documented in a Statement of Advice (SoA) or, in specific circumstances, a Record of Advice (RoA), that confirm the discussions you have had with us, the recommendations we are making and the basis for those recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations we may have with financial product providers.

When a financial product is recommended to you, we will provide you with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product.

In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

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### WHO PROVIDES THE FINANCIAL SERVICES DESCRIBED IN THIS FSG?

The financial services described in this FSG are provided by us as Authorised Representatives of Integro. Part 2 of this Guide contains further details about our financial advisers, and their experience, qualifications and professional memberships.

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### WHO IS RESPONSIBLE FOR THOSE FINANCIAL SERVICES?

As the holder of an AFSL, Integro is responsible for the financial services we provide to you. Integro acts on its own behalf when these financial services are provided to you. In relation to the financial services offered in this FSG, Integro, as the holder of an AFSL, does not act on behalf of any other person or licensee. Integro is only responsible for the services offered in the FSG.

The law requires Integro to have arrangements in place to compensate certain persons for loss or damage they may suffer from certain breaches of the Corporations Act by Integro and/or its Authorised Representatives. Integro has internal compensation arrangements as well as professional indemnity insurance that satisfy these requirements.

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### WHAT FINANCIAL SERVICES DO WE OFFER?

Integro can provide financial product advice and deal in a wide range of products (unless otherwise stated in Part 2 of this Guide) including:

- deposit products
- government debentures, stocks or bonds
- life investment and life risk products
- managed investment schemes, including investor-directed portfolio services
- standard margin lending facilities

- retirement savings account products
- securities such as shares
- superannuation products.

Some of the services you can access through Integro include:

- financial planning advice
- wealth accumulation advice
- superannuation advice, including self-managed superannuation funds
- redundancy advice
- retirement advice
- gearing strategies
- cash flow advice
- social security benefits advice
- life and disability insurance advice
- estate planning services (financial planning).

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## **WHAT PRODUCTS ARE AVAILABLE?**

A range of financial products offered by many leading financial product providers are available for recommendation by us. Details of the available products we can recommend are contained in our Approved Product List (APL).

Internal and external experts provide financial product research, which is used to carefully select and maintain an extensive list of approved products for us to select from. We conduct due diligence on the external research report providers who provide us with research.

We will only recommend a product to you after considering its appropriateness to your personal financial objectives, financial situation and needs. The recommendation will be made after conducting an investigation into the financial products and may require us to investigate and consider a financial product that is not on the APL.

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## **HOW DO WE ENSURE THAT THE ADVICE WE GIVE IS SUITABLE FOR YOU?**

To ensure we provide advice that is suitable for you, we firstly need to understand your personal financial objectives, financial situation and needs. To gain this understanding, we will follow a step-by-step process as outlined below:

1. We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services we can offer.
2. We will collect all the information we need from you, including your personal financial objectives, financial situation and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing your full personal information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter you request.

3. We will help you identify your goals and may discuss your attitude towards investment risk.
4. We may consider strategies and areas such as income, social security, insurance, cash and estate planning requirements. Where required, we will also conduct a reasonable investigation of the financial products that may be suitable to implement the strategies developed as part of the recommendations. Based on these and other considerations, we will prepare and present you with a written SoA, or in some cases depending on the circumstances, an RoA. We will explain in the SoA, or RoA, the basis for the advice, and any remuneration, benefits or associations that could have influenced the advice.
5. Where we recommend financial products, we will provide you with a PDS or other disclosure document containing information about each product recommended, to help you make an informed decision about whether to purchase that product.
6. We will discuss our recommendations with you, make any changes you require and gain your agreement to implement those recommendations.
7. We will then implement those recommendations.
8. If we agree to an ongoing advice service arrangement that includes a regular review component, we will meet with you periodically to review your financial circumstances. If an ongoing service arrangement is entered into, this will be documented in your Ongoing Service Arrangement Letter and/or SoA. Where you have entered into an ongoing fee arrangement that is dated after 1 July 2013, we will renew your arrangement with you at a minimum of every two years.

We will also explain to you any significant risks associated with the financial products and strategies that we recommend to you. If you are unclear about the risks, do not hesitate to question us further.

In certain circumstances, we may not provide you with personal advice via an SoA or RoA, as outlined above. These circumstances may include:

- where we provide you with only general advice, such as through seminars and newsletters
- further advice or verbal advice. If you previously received advice recorded in an SoA, any further personal advice provided by us may be recorded in an RoA. We will not necessarily provide you with a copy of the RoA unless you request it (see below).

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## **WHAT DOCUMENTS DO YOU RECEIVE IF WE PROVIDE FURTHER ADVICE?**

Where a further review is conducted and personal advice is provided, in some circumstances we are not required to provide you with an SoA for this further advice. Where this is the case, if you have not already been provided with an RoA, you may request a copy of the RoA from us by contacting us (on any of the contact details set out in Part 2 of this Guide) for up to a period of seven years from when the further advice was first provided to you.

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## **HOW CAN YOU INSTRUCT US?**

You may specify how you would like to give us instructions—for example, by phone, fax or email—by using any of the contact details set out in Part 2 of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

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## OTHER SERVICES

We may refer you to other service providers depending on your circumstances and requirements and you should understand that they are not provided under Integro's AFSL and Integro does not train, support or supervise the provision of these other services and has no responsibility in relation to them.

Examples of the services that Integro is not responsible for include:

- general insurance services (e.g., car insurance)
- real estate and direct property advice
- taxation services, such as completion of tax returns
- accounting and audit services
- legal services
- credit activities
- consulting services
- administration and compliance of self-managed superannuation funds
- any joint venture arrangements with other service providers.

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## HOW ARE WE PAID FOR OUR SERVICES?

We and Integro may receive:

- fees paid by clients
- commissions paid by product providers
- other payments by product providers
- other benefits.

All fees and commissions are payable to Integro as the Licensee. Integro pays 100% of any fees and commissions to us at Integro Private Wealth.

Details of any fees, commissions or other benefits that we, Integro or other associated persons are entitled to receive will be disclosed to you in your SoA or RoA when personal advice is given.

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## WHAT TYPE OF FEES, COMMISSIONS, PAYMENTS AND OTHER BENEFITS DO WE RECEIVE FOR OUR SERVICES?

The types of fees, commissions and other benefits that may be received by us and by Integro include the following:

### Service fees

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination, or part of, any of these fees.

### Fees for advice

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity of your financial situation



and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement to the fees before we provide you with advice.

### **Implementation fee**

We may charge a placement fee and/or implementation fee to implement the recommendations in your financial plan. These are payable when you decide to proceed with the implementation of any one or more recommendations that we provide to you.

Fees for our initial advice and implementation of our recommendations range from \$550 to \$8,800 inclusive of GST.

### **Ongoing Service fees**

If you elect to pay a fee for the ongoing review of your financial planning strategy, the ongoing fee is based on the complexity of ongoing advice and the services provided. The minimum fee is 0.88% while the maximum is 1.90% of the value of your portfolio each year. For example, for an investment valued at \$200,000 the maximum ongoing fee would be \$3,800 pa (inclusive of GST).

**Borrowed funds** – if we recommend you acquire investments using borrowed funds then your ongoing fee will be a minimum of \$550 and a maximum of \$11,000 pa.

### **Referral fees**

If we refer you to another business to provide you with services, we may receive referral fees. Those fees may vary according to the party to whom we are referring, and the services involved. We will provide written notification to you in our advice documentation if we are likely to receive referral fees for referring you to another service provider. This fee may be up to 25 per cent of the fee paid by you for the services provided to you by the other business.

### **Payment methods**

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods. Where a fee is debited from your investments it is normally referred to as an Adviser Service Fee. In most instances, you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

### **Commissions**

If you take out a financial product through us, Integro may receive payments in the form of initial commissions and/or ongoing commissions from the financial product providers. These commissions are included in the fees, premiums and in the case of margin loans, the interest rate you pay for the product. This is not an additional cost to you. We may agree to rebate some or all of these commissions.

The commission payable for different classes of financial products include the following:

#### **Life insurance products**

Initial and ongoing commissions from insurance providers may be received by Integro. These commissions are paid to Integro by the company that issues the product that we recommend to you, and they are included in what you pay for the product. The commissions vary and are based on the policy cost, which is the sum of the premiums you pay, and may include other fees related to the product.

The initial commission is paid by the product issuer to Integro in the first year. Ongoing commissions are payments paid by product issuers to Integro in the years after the first year. These commissions are passed onto to us at Integro Private Wealth.

If you initiate an increase to your cover, Integro may receive an initial commission and ongoing commissions based on the annual increase to your policy cost. The ongoing

commission on an increase to cover initiated by a client is only paid in respect of the period that starts from the first anniversary of the increase.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), Integro may receive up to 30 per cent (excl. GST) of your annual policy cost. If the initial commission is higher than the ongoing commissions, the maximum commission that Integro may receive is set out in the table below:

DATE A NEW PRODUCT IS ISSUED	INITIAL COMMISSION (% OF ANNUAL POLICY COST OR INCREASE EXCL. GST)	ONGOING COMMISSION P.A. (% OF ANNUAL POLICY COST OR INCREASE EXCL. GST)
Before 1 January 2018 or before 1 April 2018 when the application was received prior to 1 January 2018	0 - 140%	0 - 38.5%
1 January 2018 – 31 December 2018*	0 - 80%	0 - 20%
1 January 2019 – 31 December 2019*	0 - 70%	0 - 20%
From 1 January 2020*	0 - 60%	0 - 20%

\* Integro may receive the pre 1 January 2018 commission rates above from the product issuer if:

- your policy was issued before 1 January 2018 and you exercise an option or apply for additional cover under your policy after 1 January 2018
- your policy was issued before 1 January 2018 and is replaced after 1 January 2018 to correct an administrative error.

### Example

We recommend an insurance product to you and it is applied for and issued on 2 February 2018. The annual policy cost is \$450. Integro may receive up to \$360 (80 per cent excl. GST) as an initial commission and may pass up to \$360 to us. Assuming the policy cost stays the same each year, Integro may receive up to \$90 p.a. (20 per cent excl. GST) as an ongoing commission and may pass up to \$90 p.a. to us.

From 2 April 2018, you decide to increase your insurance cover. The cost of this increased cover is \$100. The initial commission payable to Integro in respect of this increase will be \$80 (80 per cent excl. GST) as the increase has occurred in 2018. The ongoing commission payable to Integro in respect of this increased policy cost will be \$20 p.a. (20 per cent excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e., 2 April 2019). These commissions may be passed onto us.

From 2 April 2020, you decide to increase your insurance cover again. The cost of this increased cover is \$100. The initial commission payable to Integro in respect of this increase will be \$60 (60 per cent excl. GST). The ongoing commission payable to Integro in respect of this increase will be \$20 p.a. (20 per cent excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e., 2 April 2021). These commissions may be passed onto us.

You'll find details of how your insurance policy cost is calculated in the relevant PDS that we provide to you. Where personal advice is provided to you, you'll find details in your SoA or RoA of the commission that Integro and we are entitled to receive if you decide to purchase a life insurance product.

### **Margin lending products Commission – Existing clients only**

Integro may receive payments in the form of ongoing commissions from the margin loan provider. Commissions on margin lending products may only be payable in certain circumstances where an arrangement existed as at 1 July 2013. Where you have entered into a margin lending product arrangement prior to 1 July 2014, commissions may be payable where Integro had an existing arrangement with the margin loan provider prior to 1 July 2013. These commissions range between 0 per cent and 0.55 per cent (inclusive of GST) of your loan balance p.a.

#### **Example**

We recommend you borrow \$10,000 through a margin loan. The applicable ongoing commission is 0.55 per cent p.a.

Assuming the loan balance stays the same, each year Integro will receive an ongoing commission of \$55 and will pass this on to us at Integro Private Wealth.

### **Investment product Commission – Existing clients only**

For investment products, including superannuation and annuities, commissions are generally deducted from the funds you invest. Commissions on investment products may only be payable in certain circumstances where an arrangement exists as at 1 July 2013. Where you have acquired an investment product before 1 July 2014, commissions may be payable where Integro has an existing arrangement with the product issuer prior to 1 July 2013.

Integro may receive ongoing commissions from the management fees of the product providers. These ongoing commissions range between 0.00% and .88% p.a. (inclusive of GST) of your investment balance.

#### **Example**

We recommended you invest \$100,000 in an investment product before 1 July 2014. Assuming the investment amount stays the same, each year, Integro will receive ongoing commission of up to \$880 and may pass up to \$880 to us at Integro Private Wealth.

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## **OTHER BENEFITS**

From time to time Integro may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g., training, or sponsorship to attend conferences), up to a value of \$300. We maintain a register detailing any benefit we receive, together with other benefits that relate to information technology software or support provided by a product issuer, or that relate to educational and training purposes.

A copy of the register is available on request, for a small charge.

### **Other benefits that may result from the financial services offered in this FSG**

#### **Life insurance providers**

##### **AIA: Existing clients only**

Justin Gilmour has entered into an arrangement with AIA Australia Limited relating to life insurance products that provide payment to Integro in the form of commissions. The payment is based on the retention of certain AIA Insurance policies that were in place prior to 1 January 2018, or where an application for insurance has been submitted before 1 January 2018 and put into force before 31 March 2018.

Integro may receive a bonus of 1.0 per cent of each \$1,000,000 of in-force premiums, up to a maximum of 10 per cent for \$10,000,000 with AIA. The bonus rate is currently 3% of net in-force premiums on a level or hybrid commission structure. Integro (as the

Licensee) pays 100% of this payment to us. The premium value of these in-force policies in 2017 was \$3,532,554.

### **Example**

Assuming the net in-force policy premiums remain at \$3,532,554, we will receive a bonus payment of \$105,976.62 ( $\$3,532,554 \times 3\%$ ) each year.

If we recommend you retain a relevant AIA life insurance product and your annual insurance premium is \$1,000, Integro will receive a bonus payment of up to \$30 each year from AIA Australia Limited – ( $\$1,000 \times 3\%$ ).

### **TAL Life Limited: Existing clients only**

In addition to the standard commission rates, TAL may pay to Integro an additional bonus in relation to insurance premiums totalling \$250,000 or more for policies that we have placed with TAL prior to 1 January 2018, or where an application for insurance has been submitted before 1 January 2018 and put into force before 31 March 2018. This in-force bonus could be between \$10,000 and \$100,000. Any such bonus will be paid to Integro (as the Licensee) who will pay this bonus to us.

The bonus payment is calculated as the value of the above In-Force premiums x Bonus % x a Lapse Multiplier. The amount of the in-force bonus may be increased by up to 150 per cent if Integro achieves a specified target level of retention of TAL policies.

### **Example**

The bonus payment applies to \$546,522 of in-force insurance premiums. Assuming an 8% Annual Lapse Rate, a bonus percentage of 2% and lapse multiplier of 120% we would be entitled to \$13,117 ( $\$546,522 \times 2\% \times 120\%$ ) each year.

If we recommend you retain a relevant TAL life insurance product with an annual premium of \$1,000, we will receive an annual bonus of \$24 ( $\$1,000 \times 2\% \times 120\%$ ).

The above bonus payments have no impact on the premium you pay for your insurances.

### **Transaction Fees - Stockbrokers**

Integro has an arrangement with Shaw and Partners under which Integro determines the rate of brokerage charged by Shaw Stockbroking for Australian Securities Exchange (ASX) listed security transactions.

The brokerage fee is deducted from the settlement proceeds of the transaction. Shaw and Partners retains \$55 or 0.55% of the value of the trade, whichever is higher, with the balance paid to Integro. This amount will be between 0.0% and 0.33% of the value of the trade, with a minimum amount payable to Integro of \$33.

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## **WHAT FEES DO WE PAY TO SOMEONE WHO REFERS YOU TO US?**

If you are referred to us we may pay the referrer a fee. We may also provide the referrer with gifts such as branded promotional items, hampers or gift vouchers.

The fee varies according to the referrer and financial products involved.

We may pay a referral fee to other professionals who refer you to us. The referral fee may be up to 25 per cent of our initial and ongoing fees. If applicable, this will be disclosed in your Statement of Advice.

In addition, we control a percentage of the equity interests in joint ventures that provide other professional services. As a result, we will benefit from fees, dividends or income received from



the profits or value of the joint venture that may result from any payments or other benefits received in respect of services provided to you, as per the following:

Further information about such arrangements is included in the introductory statement of this Guide headed 'About Integro'.

# PART 1

## SECTION 2 PRIVACY STATEMENT

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### WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information from you, including sensitive information such as health details, in order to provide you with services, including financial advice.

We may also use this information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may be unable to provide a product or service, including financial advice, to you.

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### COLLECTING AND DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal information to other members of Integro, anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties, such as a complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business, and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you that relates to our provision of financial advice.

We may disclose your personal information to an entity that is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia and, in some cases, offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Integro is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations, to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations.

We have certain reporting obligations pursuant to the AML/CTF Act, and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

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## **OTHER IMPORTANT INFORMATION**

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy.

As appropriate, our privacy policy is available at [www.integrowealth.com.au](http://www.integrowealth.com.au). It covers:

- how you can access the personal information we hold about you and ask for it to be corrected
- how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code, and how we will deal with your complaint
- how we collect, hold, use and disclose your personal information in more detail.

We will update our privacy policy from time to time.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement. We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

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## **DEFINITIONS**

‘We’, ‘our’, ‘us’ means Integro Holdings (WA) Pty Ltd and its Authorised Representatives.

# PART 1

## SECTION 3 ARE YOU SATISFIED?

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### WHAT TO DO IF YOU HAVE ANY CONCERNS ABOUT OUR SERVICES

Both we and Integro endeavour to provide you with quality financial advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

- a. Firstly, contact your adviser about your concern.
- b. If your concern is not resolved to your satisfaction within five (5) business days, you may contact Integro by:

**Post:**

Advice Complaints  
Integro Holdings (WA) Pty Ltd  
38 Station Street, Subiaco, Western Australia, 6008  
or  
PO Box 258, Subiaco, Western Australia, 6904

Email: [goodadvice@integrowealth.com.au](mailto:goodadvice@integrowealth.com.au)  
Online: [www.integrowealth.com.au](http://www.integrowealth.com.au)

- c. If your concern is not resolved, or if you are not satisfied with the decision, you may contact the Australian Financial Complaints Authority (AFCA) by:

**Post:**

Australian Financial Complaints Authority  
GPO Box 3, Melbourne VIC 3001

Email: [info@afca.org.au](mailto:info@afca.org.au)  
Phone: 1800 931 678  
Online: [www.afca.org.au](http://www.afca.org.au)

- d. The Australian Securities & Investments Commission (ASIC) is Australia's corporate, markets and financial services regulator. ASIC contributes to maintaining Australia's economic reputation by ensuring that Australia's financial markets are fair and transparent, and is supported by informed investors and consumers alike. ASIC seeks to protect consumers against misleading or deceptive and unconscionable conduct affecting all financial products and services. You may contact ASIC by:

**Post:**

Australian Securities & Investments Commission  
GPO Box 9827  
Your Capital City  
or  
PO Box 4000  
Gippsland Mail Centre



Victoria 3841

Phone: 1300 300 630

Online: [www.asic.gov.au](http://www.asic.gov.au)

- e. Where you have a complaint about your privacy, you may contact the Office of the Australian Information Commissioner (OAIC), by:

**Post:**

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Phone: 1300 363 992

Online: [www.oaic.gov.au](http://www.oaic.gov.au)

Before you discuss your concern with any of these respective bodies, we recommend you contact them for information about the process of lodging your concern with them.

## PART 2

# FINANCIAL ADVISERS

## JUSTIN GILMOUR

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### Name

Justin Gilmour  
Managing Director

### EXPERIENCE

Financial services professional since 2000

### QUALIFICATIONS

- Bachelor of Business
- Diploma of Financial Planning
- SMSF Specialist Advisors™
- Associate Financial Planner of the FPA

### MEMBERSHIPS

- Full member of the Financial Planning Association (FPA)
- SMSF Association (SMSFA)
- Registered Tax (Financial) Adviser with Tax Practitioners Board

### ASIC NUMBER

250768

### CONTACT

08 9388 8099  
justin@integrowealth.com.au

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Justin founded Integro in 2003 and after six years re-launched the firm with an innovative business model that avoids investment-related commissions and asset-based fees. This approach has seen us grow into a widely respected practice managing over \$400 million for more than 400 clients across Western Australia. Many of the people and families we assist work in the corporate, small business and professional sectors, particularly in fields such as pharmaceuticals. We have also attracted a significant number of rural clients from the ‘wheat belt’ of WA, reflecting Justin’s family origins in the state’s northern agricultural region, around farming towns such as Carnamah.

Given our clients are generally high net worth individuals and families, we have developed considerable expertise in designing complex investment strategies tailored around self-managed superannuation funds (SMSF).

Prior to founding the firm, Justin spent several years as a financial adviser with Westpac Financial Planning in Perth. His qualifications include a Bachelor of Business degree from Edith Cowan University and a Diploma of Financial Planning. He has also been accredited by the SMSF Association (SMSFA) as an SMSF Specialist Adviser.

Justin is a full member of SMSF Association (SMSFA) and the Financial Planning Association (FPA), the leading industry body for Australia’s professional financial advisers. In 2012, the financial planning trade publication ‘Wealth Professional’ named him Australian Adviser of the Year, and in 2014 he was recognised by the prestigious ‘40under40’ awards program as one of Western Australia’s leading business entrepreneurs.

These awards are testament to Justin’s leadership skills, which drive the culture of our business based on integrity, respect, excellence and success.

### Advice and services provided

Justin is authorised by Integro to provide all the services listed Part 1 – “What Financial Services do we offer”.

Should you require advice or services that extend beyond Justin’s authority, he can refer you to a suitably qualified external specialist.

### Remuneration

As a director of Integro Private Wealth, Justin receives director fees and a share of profits.

# FINANCIAL ADVISERS

## NADA MATICEVIC

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**Name**

Nada Maticevic  
Private Wealth Adviser

**EXPERIENCE**

Financial services professional since 2000

**QUALIFICATIONS**

- Bachelor of Business
- Diploma of Financial Planning
- Certified Financial Planner

**MEMBERSHIPS**

- Full Member of the Financial Planning Association (FPA)
- Registered Tax (Financial) Adviser with Tax Practitioners Board

**ASIC NUMBER**

242659

**CONTACT**

08 9388 8099  
nada@integrowealth.com.au

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Nada's advice is backed by a wealth of experience gained from more than two decades in the financial services industry. Previously a partner in her own practice, she built considerable knowledge by working in every department of that firm. Nada is dedicated to helping our clients develop, manage and protect their wealth by providing personalised strategic advice and wealth management solutions.

Nada graduated from Edith Cowan University with a Bachelor of Business degree, majoring in Economics and Finance, and also holds a Diploma of Financial Planning and is a Certified Financial Planner.

**Advice and services provided**

Nada is authorised by Integro to provide all the services listed in Part 1 – “What Financial Services do we offer”

Should you require advice and services that extend beyond Nada's authority, she can refer you to a suitably qualified external specialist.

**Remuneration**

Nada receives a salary as an employee of Integro Private Wealth. She may also receive a performance bonus based on certain performance criteria.

# FINANCIAL ADVISERS

## BRYCE WILD

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### Name

Bryce Wild  
Private Wealth Adviser

### EXPERIENCE

Financial services professional since 2015

### QUALIFICATIONS

- Bachelor of Commerce (Honours)
- Advanced Diploma of Financial Planning

### MEMBERSHIPS

- Full Member of the Financial Planning Association (FPA)

### ASIC NUMBER

1256168

### CONTACT

08 9388 8099  
bryce@integrowealth.com.au

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Born and raised in South Africa, Bryce studied at Rhodes University, earning a Bachelor of Commerce Honours degree. He began his career at NFB Private Wealth, starting as a Paraplanner and then progressing to a Private Wealth Manager. He completed his Post Graduate Diploma in Financial Planning and qualified as a Certified Financial Planner in 2015.

Bryce then moved to Perth in April 2017 as a Senior Financial Planner and completed his Advanced Diploma in Financial Planning.

Bryce enjoys empowering his clients, by helping them to take control of their financial future. He believes the best way to do this is by jointly uncovering their financial and lifestyle goals and then working with his clients on an ongoing basis, as he takes joint responsibility in ensuring these goals are achieved over time.

### Advice and services provided

Bryce is authorised by Integro to provide the services listed in Part 1 – “What Financial Services do we offer”.

Should you require advice and services that extend beyond Bryce’s authority, he can refer you to a suitably qualified external specialist.

### Remuneration

Bryce receives a salary as an employee of Integro Private Wealth. He may also receive a performance bonus based on certain performance criteria.

# FINANCIAL ADVISERS

## NICHOLAS HARMER

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### Name

Nicholas (Nick) Harmer  
Private Wealth Adviser

### EXPERIENCE

Financial services professional since 2012

### QUALIFICATIONS

- Certified Financial Planner
- Bachelor of Economics
- Diploma of Financial Planning

### MEMBERSHIPS

- Full Member of the Financial Planning Association (FPA)
- Registered Tax (Financial) Adviser with Tax Practitioners Board

### ASIC NUMBER

1233698

### CONTACT

08 9388 8099

[nickh@integrowealth.com.au](mailto:nickh@integrowealth.com.au)

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Nick is a financial adviser with more than 13 years of experience in the financial services industry. Nick began his career as a paraplanner and moved through the educational and training requirements to become a financial adviser. Nick has a Bachelor of Economics from the University of WA as well as a Diploma of Financial Services and is a Certified Financial Planner.

Nick specialises in retirement planning, life insurance and handling insurance claims. Nick enjoys working with clients to develop strategies that helps them achieve their retirement aspirations.

### Advice and services provided

Nick is authorised by Integro to provide the services listed in Part 1 – “What Financial Services do we offer”.

Should you require advice and services that extend beyond Nick’s authority, he can refer you to a suitably qualified Integro financial adviser or external specialist.

### Remuneration

Nick receives a salary as an employee of Integro Private Wealth. He may also receive a performance bonus based on certain performance criteria.