



# FINANCIAL FRAMEWORK

Financial Services Guide  
Version 6 Issue 8 June 2019

This Financial Services Guide was prepared  
and issued with the authority of  
Synchronised Business Services Pty Ltd  
ABN: 33 007 207 650

trading as  
**SYNCHRON**

Australian Financial Services Licence 243313  
Life Insurance Broker

Corporate Member of the Association of Financial Advisers

We welcome you to Synchron. Our initial obligation at the start of the relationship is to fully inform you of your rights and entitlements and detail the services we provide.

This Financial Services Guide (FSG) is intended to inform you of certain basic matters relating to your relationship with our Authorised Representative and with us, prior to you being provided with an authorised financial service. Subjects covered in this FSG include who we are, contact details for us and our Authorised Representative, how we and our Authorised Representatives are remunerated, what to do in the event of a complaint, and the method by which we engage our professional advice process.

It is intended that this document should assist you in determining whether to use any of the services described. It is our duty to provide you with this document at the first available opportunity.

**This document is Part 1 of our FSG and should be read in conjunction with ‘Part 2 – Adviser Profile’, which will be given to you with this FSG. The two parts make up the FSG and the distribution has been approved by Synchron.**

## Getting started

### Who is your Adviser?

Your adviser is an Authorised Representative of Synchron. Details of your adviser and the charging methodology are contained in the attached Adviser Profile.

### Who is responsible for the advice given to you?

Synchron is responsible for the financial services provided to you.

### What financial services are offered?

Synchron is the holder of an Australian Financial Services (AFS) Licence which allows us to provide financial product advice and deal in the following financial products:

- Deposit Products
- Non Basic Deposit Products
- Government debentures, stocks or bonds
- Life insurance investment products
- Life insurance risk products
- Managed Investments including Investor Directed Portfolio Services
- Managed Discretionary Accounts
- Retirement Saving Accounts
- Securities
- Standard Margin lending facilities
- Superannuation

The Adviser Profile page outlines the financial services that your adviser is authorised to provide on behalf of Synchron. Your adviser is also not able to provide advice on products that are not on Synchron's Approved Product List or have not otherwise been approved by Synchron.

### **Before receiving advice**

#### **Will we provide you with advice suitable to your needs and financial circumstances?**

Yes. In order for us to provide quality advice, you need to supply us with your individual objectives, financial situation and needs. You have the right not to divulge this information; if you do not wish to do so then we are required to warn you that before acting on the advice provided, you will need to consider the appropriateness of the advice with regards to your personal situation and needs. You should ask your Authorised Representative about these consequences if you are not sure.

#### **What should you know about the risks of the financial products or strategies we recommend to you?**

Our Authorised Representative will explain to you any significant risks of the financial products and strategies which are recommended to you.

#### **What information do we maintain in your file and can you examine your file?**

Our Authorised Representative will maintain a record of your personal profile, which includes details of your objectives, financial situation, needs, copies of recommendations made to you and any products acquired by you.

If you wish to examine your file, we ask that you make a request in writing and allow up to fourteen (14) working days for the information to be forwarded. You may be charged a fee to cover the cost of verifying the application and locating, retrieving and copying any material requested. If the information sought is extensive, you will be advised of the likely cost in advance and we can help to refine your request if required.

### **Provision of advice**

#### **When will you receive a Statement of Advice?**

You are required to receive a Statement of Advice whenever our Authorised Representative provides you with personal advice which takes into account your objectives, financial situation and needs. This Statement of Advice will contain the basis on which the advice is given, personal information, recommendations and information about fees, remuneration and associations which may have influenced the provision of the advice.

Thereafter, if your circumstances have not significantly changed our Authorised Representative can provide you with another Statement of Advice or a Record of Advice as a confirmation of the advice provided. You are able to request a copy of these documents from our Authorised Representative at any time up to a period of seven years.

### **Product Disclosure Statement**

When our Authorised Representative makes a recommendation to acquire a particular financial product, you must also be provided with a Product Disclosure Statement from the issuing product provider which gives full details of the recommended product to assist in making an informed decision to acquire that product.

#### **How will you pay for the services provided?**

A fee may be charged for our services. This may be waived or partially offset by brokerage, commission or fees if you proceed. Upon implementation of the recommendations, our Authorised Representative may receive an upfront fee, commission (for risk insurance products) or a combination of both depending on how you agree to pay for the services. Fees can be based on total funds placed, the time spent on the services you receive, or as agreed between you and our Authorised Representative. Costs and remuneration will be disclosed in your Statement of Advice.

All fees and commissions are paid to Synchron, which deducts a fee for the services it provides as the licensee and then pays the balance to your adviser subject to any agreements. Some of our Authorised Representatives have referral arrangements with other professionals. Where a referral agreement is in place between the Authorised Representative and a third party, a fee may be paid or received. Detailed disclosure of amounts and percentages will appear in your Statement of Advice if applicable.

A review service fee may also be payable from time to time, depending on any extra work required such as a major restructuring. Further details are provided in the Adviser Profile section.

### Life Insurance advice

If you decide to purchase a life insurance product, unless stated to the contrary in your Statement of Advice, Synchron has elected to receive commission from the product providers and not invoice you directly for services provided. Please refer to the "Adviser Profile" section of this FSG for further details.

If you do not continue with a purchased life insurance product for a full 24 months, the commission received by Synchron is returned to the insurance company, and you may then be invoiced for this amount.

## Investments and Superannuation advice

If you decide to proceed on the investment or superannuation advice provided, the fee you may be charged may be dollar based or may be calculated as a percentage of the amounts invested. The fee may also be reflective of an hourly rate. For details, please refer to the enclosed Adviser Profile section.

### **Conflicts of Interest**

Synchron and our Authorised Representative may receive “additional benefits”, from product providers we deal with, such as sponsorship for making available professional development to our Authorised Representatives, and/or small gifts or entertainment.

“Additional benefits” are not permitted to be paid to our Authorised Representative if they are as a result of, or conditional on, the amount of business an Authorised Representative gives to a product provider.

Synchron may be entitled to bonuses, incentives or expense rebates from product providers based on the total income generated from certain products. These amounts are paid out of the product provider’s own administration fees and do not increase product costs above what you would normally pay if these payments were not in place. Synchron currently has such arrangements with ANZ Life, MLC, AIA, Netwealth, BT Life, Colonial First State and Commlnsure; this list is subject to change. Synchron holds no interest in or investments in any product provider. Synchron has put measures in place to ensure that these “additional benefits” will not influence any financial product advice provided by Synchron Authorised Representatives.

The directors of Synchron are also directors of Valant Capital Pty Ltd, and own shares in Valant Capital Pty Ltd, so they may receive benefits from Valant such as dividends. Synchron also provides financial accommodation to Valant in the form of a loan. No benefits or incentives are offered to Authorised Representatives to use Valant.

Where Synchron Medical is used to complete your medical or pathology reports, your adviser may receive a payment of \$20 per referral (this amount may be subject to change).

### **Dispute Resolution**

#### **Who can you complain to if you have a complaint about the provision of financial services to you?**

If you have any complaints about a financial service provided to you by a Synchron Authorised Representative, you should take the following steps:

1. Contact your Authorised Representative and tell them about your complaint.
2. If your complaint is not satisfactorily resolved within three working days, or you would prefer not to contact your Authorised Representative, please contact the Complaints Manager at Synchron via any of the following methods:
  - by email to [compliance@synchron.net.au](mailto:compliance@synchron.net.au)
  - by mail to PO Box 438 North Melbourne, Victoria 3051;
  - by phone at 03 9328 3900; or
  - via the online form at <http://synchron.net.au/contact.php>.
3. Synchron will endeavour to resolve all complaints within 45 days of lodgement. Should there be special circumstances relating to the complaint, such that it is not reasonable for the complaint to be resolved in that time, Synchron will inform you of the reasons for the delay. We may request an extension of time up to a total of 90 days.
4. If Synchron has not responded within 45 (or 90) days or you are not satisfied with the response, you can lodge a dispute with the Australian Financial Complaints Authority. This service is provided to you free of charge.

### **Australian Financial Complaints Authority (AFCA)**

AFCA is a free and independent dispute resolution scheme.

Phone: 1800 931 678

Website: [www.afca.org.au](http://www.afca.org.au)

Address: GPO Box 3, Melbourne VIC 3001

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

## Does Synchron have Professional Indemnity Insurance in place?

Yes, Synchron has Professional Indemnity Insurance, in accordance with s912B of the Corporations Act 2001, covering itself and its Authorised Representatives for breaches of professional duty whilst conducting their professional services. Subject to the policy terms and conditions of cover, the policy extends to include cover for professional indemnity claims made against past employees and Authorised Representatives who no longer work for Synchron but who did at the time of the relevant conduct.

## Statement of Synchron's Privacy Policy

Synchron is committed to ensuring the confidentiality and security of the information provided by you to us. We support and embrace the Australian Privacy Principles set out in the Privacy Amendment (Private Sector) Act 2000 and the protection afforded by this act for the security of private information held on ordinary Australians.

A full copy of our Privacy Policy is available on our website [www.synchron.net.au](http://www.synchron.net.au).

We may, on occasion, have administrative & or Paraplanning tasks completed outside Australia. Our offshore provider is Integra Asset Management Australia, their operation is based in India. To contact Integra please email the Managing Director, Mr Mark Fisher at [mark@integraassetmanagement.net](mailto:mark@integraassetmanagement.net) or in writing at Suite 6, Level 2, 11 Ventnor Avenue, West Perth 6005.

We also need to collect copies of your identification to meet our obligations under the Anti-Money Laundering and Counter Terrorism Financing Act 2006. We may also request that you provide us with your Tax File Number, however if you choose not to, there may be tax implications for you.

If you have any complaints about how we handle your private information, please contact us as set out above. We take your privacy seriously and will address your concerns through our complaints handling process. If you believe you do not receive a satisfactory resolution to your concerns, you may contact the Office of the Australian Information Commissioner (OAIC). The website of the OAIC is [www.oaic.gov.au](http://www.oaic.gov.au).

<b>Synchron Executive Directors</b>	<b>Address:</b>	
Don F Trapnell John L Prossor	PO Box 438, North Melbourne, Victoria 3051	<b>Tel:</b> 03 9328 3900 <b>Fax:</b> 03 9328 4031 <b>Email:</b> <a href="mailto:info@synchron.net.au">info@synchron.net.au</a>
		<b>Website:</b> <a href="http://www.synchron.net.au">www.synchron.net.au</a>

## Adviser Personal Details

### Your Questions - Our Answers

#### Who will be providing the financial services to me?

Financial Framework Pty Ltd atf The F F Unit Trust t/as Financial Framework are Authorised Representative No. 456867 acting under authority from Synchron.

#### Financial Framework:

Business Address: Suite 1, 84 Matlock Street, Mount Hawthorn, WA 6016 Tel: (08) 6144 4000 Fax: (08) 6311 7270

#### Who are my advisers who are authorised to act on behalf of Synchron and within the Corporate Authorised Representative of Financial Framework?



**Tim Luxton**

**Mb: 0402 900 669**

**Email: [tim.luxton@financialframework.com.au](mailto:tim.luxton@financialframework.com.au)**

Tim has been in the Financial Services industry since 1999 and a Financial Adviser since 2002. He has completed the Diploma of Financial Planning and has a Bachelor of Business. He has a wide array of experience in numerous arrears of financial planning and deals with clients from 18 through to 90. He is always looking for new ideas to improve and simplify his clients financial situation.

Tim Luxton is also a member of the Association of Financial Advisers.

#### What kinds of financial services is Tim Luxton authorised to provide me and what kinds of products do those services relate to?

Tim Luxton (AR No. 235875) is a principal of Financial Framework and is authorised to act on behalf of Synchron to offer you the following services:

- Provide financial product advice; and
- Deal in a financial product by arranging for a financial product to be acquired, disposed of, or varied.

In respect of the following financial products:

- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Life Products, including
- Investment Life Insurance Products
  - Life Risk Insurance Products
  - Interests in Managed Investment Schemes (incl IDPS)
- Retirement Savings Account Products
- Superannuation
- Securities
- Standard Margin Lending Facility
- Self-Managed Superannuation Funds
- Managed Discretionary Accounts



**Will Walker**

**Mb: 0409 886 367**

**Email [Will.walker@financialframework.com.au](mailto:Will.walker@financialframework.com.au)**

Will has been working in the financial planning industry since 2007 a financial adviser since 2008. He has a Bachelor of Business Majoring in Finance and has an Advanced Diploma of Financial Planning.

Will is a well-rounded Financial Adviser helping clients with early accumulation goals through to those making the most of their retirement. Will provides holistic financial advice focusing in on what really matters to his clients. Will is a member of the AFA.

#### What kinds of financial services is Will Walker authorised to provide me and what kinds of products do those services relate to?

Will Walker (AR No. 324143) is a Principal of Financial Framework and is authorised to act on behalf of Synchron to offer you the following services:

- Provide financial product advice; and
- Deal in a financial product by arranging for a financial product to be acquired, disposed of, or varied.

In respect of the following financial products

- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Life Products, including
  - Investment Life Insurance Products
  - Life Risk Insurance Products
- Interests in Managed Investment Schemes (incl IDPS)
- Retirement Savings Account Products
- Superannuation
- Securities
- Managed Discretionary Accounts
- Self Managed Superannuation Funds
- Managed Discretionary Accounts



**Daniel Hewitt**

**Mb: 0410 430 198**

**Email: [dan.hewitt@financialframework.com.au](mailto:dan.hewitt@financialframework.com.au)**

Dan is a highly qualified Financial Adviser with strong experience in commerce, law, accounting and finance. He has completed a Bachelor of Commerce in Accounting and Finance and a Bachelor of Laws having worked as both an accountant and lawyer professionally. More recently, Dan has worked in senior corporate finance roles in ASX listed companies during which time he completed a Graduate Diploma in Finance and Investment and a Diploma in Financial Planning.

Dan enjoys using his skills and experience to provide clients with quality holistic financial planning advice with a high level of integrity.

**What kinds of financial services is Daniel Hewitt authorised to provide me and what kinds of products do those services relate to?**

Daniel Hewitt (AR No. 460772) is a Principal of Financial Framework and is authorised to act on behalf of Synchron to offer you the following services:

- Provide financial product advice; and
- Deal in a financial product by arranging for a financial product to be acquired, disposed of, or varied.

In respect of the following financial products

- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Life Products, including
  - Investment Life Insurance Products
  - Life Risk Insurance Products
- Interests in Managed Investment Schemes (incl IDPS)
- Retirement Savings Account Products
- Superannuation
- Self-Managed Superannuation Funds
- Securities
- Managed Discretionary Accounts



**Joshua Hummerston**

**Mb: 0421 849 402**

**Email [Joshua.hummerston@financialframework.com.au](mailto:Joshua.hummerston@financialframework.com.au)**

Joshua has been in the financial service industry since 2008 and has been directly managing his client's affairs since 2010 in both the Financial Planning and Insurance Broking sectors. Joshua has an Advanced Diploma of Financial Planning and is a member of the Financial Planning Association of Australia.

Joshua's experience spreads across numerous generations of clients from managing their first paycheck, helping them work towards and enjoy retirement and eventually ensuring their estate and legacy are managed in the most appropriate and tax effective manner once they are gone. Joshua takes pride in seeing his clients gain the confidence to make informed decisions and achieve their goals.

**What kinds of financial services is Joshua Hummerston authorised to provide me and what kinds of products do those services relate to?**

Joshua Hummerston (AR No. 463093) is an employee of Financial Framework and is authorised to act on behalf of Synchron to offer you the following services:

- Provide financial product advice; and
- Deal in a financial product by arranging for a financial product to be acquired, disposed of, or varied.

In respect of the following financial products

- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Life Products, including
  - Investment Life Insurance Products
  - Life Risk Insurance Products
- Interests in Managed Investment Schemes (incl IDPS)
- Retirement Savings Account Products
- Superannuation
- Securities
- Managed Discretionary Accounts
- Self Managed Superannuation Funds



**Courtney Moores** Mb: 0417 173 642 Email: [Courtney.moores@financialframework.com.au](mailto:Courtney.moores@financialframework.com.au)

After completing a Bachelor of Science in 2008 Courtney has been working in financial services, specialising in Asset Finance and Home Loans for the majority of that time. After completing his Diploma of Financial Planning, more recently Courtney has been working in the Financial Planning field as he enjoys the holistic and ongoing service approach to helping clients achieve their lifestyle and financial goals.

[What kinds of financial services is Courtney Moores authorised to provide me and what kinds of products do those services relate to?](#)

Courtney Moores (AR No. 1263262) is an employee of Financial Framework and is authorised to act on behalf of Synchron to offer you the following services:

- Provide financial product advice; and
- Deal in a financial product by arranging for a financial product to be acquired, disposed of, or varied.

In respect of the following financial products

- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Life Products, including
  - Investment Life Insurance Products
  - Life Risk Insurance Products
- Interests in Managed Investment Schemes (incl IDPS)
- Retirement Savings Account Products
- Superannuation
- Securities
- Managed Discretionary Accounts



**Kellie Dhu** Mb: 0481 005 774 Email: [kellie.dhu@financialframework.com.au](mailto:kellie.dhu@financialframework.com.au)

Kellie has been in the financial services industry since 2007 and a Financial Adviser since 2009. She has completed her Advanced Diploma of Financial Planning and is currently in the process of completing her Masters of Financial Planning. Kellie is a member of the Financial Planning Association of Australia and the Association of Financial Advisers.

Kellie has experience in working with clients at all stages of life. Over time, she has built a passion for developing close working relationships with her clients to help them achieve their lifestyle and financial goals.

Kellie's strengths lay in understanding what is important to her clients, putting their needs first and explaining strategies in a clear and easy to understand manner. Kellie is able to work with clients regardless of their stage in life and offers a full range of financial services with a particular expertise in asset accumulation and protection strategies.

[What kinds of financial services is Kellie Dhu authorised to provide me and what kinds of products do those services relate to?](#)

Kellie Dhu (AR No. 392346) is an employee of Financial Framework and is authorised to act on behalf of Synchron to offer you the following services:

- Provide financial product advice; and
- Deal in a financial product by arranging for a financial product to be acquired, disposed of, or varied.

In respect of the following financial products

- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Life Products, including
  - Investment Life Insurance Products
  - Life Risk Insurance Products
- Interests in Managed Investment Schemes (incl IDPS)
- Retirement Savings Account Products
- Superannuation
- Standard Margin Lending Facility
- Managed Discretionary Accounts



Jay Brennan

Mb: 0434 907 310

Email [Jay.brennan@financialframework.com.au](mailto:Jay.brennan@financialframework.com.au)

Jay is a financial planner who strongly believes in providing holistic advice to his clients – to help him improve their financial wellbeing and protect their most important asset, their family.

[What kinds of financial services is Jay Brennan authorised to provide me and what kinds of products do those services relate to?](#)

Jay Brennan (AR No. 328851) is an employee of Financial Framework and is authorised to act on behalf of Synchron to offer you the following services:

- Provide financial product advice; and
- Deal in a financial product by arranging for a financial product to be acquired, disposed of, or varied.

In respect of the following financial products

- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Life Products, including
  - Investment Life Insurance Products
  - Life Risk Insurance Products
- Interests in Managed Investment Schemes (incl IDPS)
- Retirement Savings Account Products
- Superannuation
- Securities
- Self Managed Superannuation Funds
- Standard Margin Lending Facility
- Managed Discretionary Accounts

We will only recommend a product or strategy to you after considering its suitability for your individual situation and needs.

We do not provide advice in any other area of insurance or investments but can refer you to a professional who specialises in other areas if requested. Any arrangements you make with the other professional will be strictly between you and that person and neither Synchron nor our Authorised Representative accept any responsibility or liability for the advice given.

[Do you receive remuneration, commission, fees or other benefits in relation to providing the financial services to me and how is that commission calculated?](#)

Financial Framework Pty Ltd will be paid 100% of the brokerage and/or fees received by Synchron minus a corporate fee of \$6000 per month (inc GST) for the provisions of professional services from Synchron.

This brokerage is used to provide income after paying for the normal expenses incurred with running a business (eg rent, vehicle, computer, stationery, professional fees etc).

[Insurance Monitoring:](#)

Internal databases are maintained detailing client's insurances that were recommended by our Authorised Representative on behalf of Synchron. This does not constitute portfolio monitoring.

**Note:** This Financial Services Guide V6 Issue 8 is for the sole use by the Authorised Representatives and Financial Framework Pty Ltd only and was prepared 19<sup>th</sup> March 2021, issued with the authority of Synchronised Business Services Pty Ltd t/as Synchron, Australian Financial Services Licence No. 243313 Life Insurance Broker

[This Adviser Profile, together with the Client Receipt page, is Part 2 of our Financial Services Guide and should be read in conjunction with Part 1 as a complete document.](#)



## How we charge for our services

Unless otherwise stated, all fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

<p><b>Initial consultation</b></p>	<p>This initial meeting is at our cost. Our main aim is to gather information about yourself and to determine your primary goals and objectives in seeking advice. At the end of this meeting, we will outline the next steps and detail any fees applicable.</p>
<p><b>Advice preparation Statement of Advice Fee Paraplanning fee</b></p>	<p>The SOA preparation fee will depend on the complexity of your individual circumstances and the type of advice you require. The fee can be up to \$11,000.</p>
<p><b>Implementation of Initial Advice Fee (Fee for advice)</b></p>	<p>The fee can be up to \$11,000, depending on the level of complexity of your situation and the advice provided. This fee may be paid by invoice or where authorised by you, deducted from your superannuation or investment account.</p>
<p><b>Ongoing fee for advice (Retainer) (Fee for advice)</b></p>	<p>The ongoing advice fee can be up to \$11,000 per annum. This fee may be paid by invoice or where authorised by you, deducted from your superannuation or investment account.</p>
<p><b>Ad hoc advice</b></p>	<p>Where you do not wish to participate in an ongoing advice fee arrangement but require ongoing advice on an ad hoc basis, an hourly fee of between \$220 and \$440 may apply.</p>
<p><b>Insurance - Initial (Commission on Life Insurance Products)</b></p>	<p>The relevant insurer will pay initial commission based on a number of factors, including the annual premium, loadings which apply to the premium (such as medical or payment frequency loadings), and any policy or other fees. These factors will vary between insurers.</p> <p>The following ranges will apply (all figures are exclusive of GST and other taxes/statutory charges):</p> <p>For applications made prior to 1 January 2018 where the policy commences prior to 1 April 2018, between 0% and 130% of the total commissionable revenue for the first year; or For applications made after 1 January 2018, or where the policy commences after 1 April 2018, between 0% and 80% of the total commissionable revenue for the first year. The maximum commission reduces further to 70% from 1 January 2019, and 60% from 1 January 2020.</p> <p>Commission is paid to us by the product provider and is not an additional cost to you.</p>
<p><b>Insurance - Ongoing (Commission on Life Insurance Products)</b></p>	<p>Annual commission will be paid when you renew your policy each year. The rate of ongoing commission is between 0% and 33% of the annual policy cost for as long as you hold the product. Commission is paid to us by the product provider and is not an additional cost to you.</p> <p>Commission may also be paid on the basis of increases in sum insured under your policy. This commission will be calculated on the same basis as initial commission (see above) and will vary depending on the insurer.</p>

Financial Services Guide Receipt

I/We confirm that a Synchron Financial Services Guide has been provided to me/us together with an Adviser Profile Insert.

Financial Services Guide Version is: FSG Version 6 Issue 8 dated 19<sup>th</sup> March 2021.

Client Name	Client Signature	Date
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Client Name	Client Signature	Date
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(Adviser Name)	Adviser Signature	Date
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**OR**

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I confirm that a copy of the Financial Services Guide dated 19<sup>th</sup> March 2021 was sent via email/post to:

Client Name:.....

(Adviser Name)	Adviser Signature	Date Sent
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