



Building Your Future. Together.

Capital Wealth Management Financial Services Guide (FSG)

Capital Wealth Management Pty Ltd

Version 1.0

Issued by:

Fortnum Private Wealth Ltd (Fortnum)

ABN 54 139 889 535

Australian Financial Services Licence

(AFSL) 357306

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Contents

Welcome	1
Fortnum Private Wealth Ltd	2
How does Fortnum maintain adviser standards?	2
Who is responsible for the advice I'm given?	2
Financial services and products Fortnum can provide	2
Who is Capital Wealth Management Pty Ltd?	3
Capital Wealth Management Pty Ltd's Advisers Authorisations and Service Offering	3
Capital Wealth Management Pty Ltd's Advisers	4
Capital Wealth Management Pty Ltd's advice process	5
1. Getting to know you	5
2. Developing strategies and providing you with advice documents	5
3. Gaining your consent to proceed	6
4. Keeping you on track	6
Instructing your Adviser	6
Charging options	6
Fee for service	7
How are fees for services calculated and paid?	7
Payment of fees for services	7
Commissions on group life insurance products	7
How are commissions (initial and ongoing) from a life insurance product and service provider calculated and deducted?	8
Commissions on investment products	9
Remuneration received by Capital Wealth Management Pty Ltd	9
Adviser Remuneration	9
Other forms of remuneration or benefits	11
Professional Indemnity Insurance	12
Your privacy	13
What to do if you have a complaint	15
Conflicts you should be aware of	16

Welcome

This Financial Services Guide has been authorised for release and distribution by Fortnum Private Wealth Ltd ABN 54 139 889 535 Australian Financial Services Licence (**AFSL**) 357306 (**Fortnum**).

This Financial Services Guide (**FSG**) provides you with important information about Fortnum, Capital Wealth Management Pty Ltd and Joel Lewis (**Adviser**) who may provide you with the services described in this FSG.

Capital Wealth Management Pty Ltd (ABN 76 633 221 646) and its Advisers are Authorised Representatives of Fortnum Private Wealth Ltd. Capital Wealth Management Pty Ltd's Corporate Authorised Representative Number is **xxxxx**. This FSG contains important information about:

- Fortnum and Professional Private Wealth Pty Ltd of which your Adviser is a director and/or an employee;
- the areas of advice and services your Adviser is authorised to provide on behalf of Fortnum;
- your Adviser's skills and qualifications;
- Professional Private Wealth Pty Ltd's advice process;
- how Fortnum, your Adviser or Principal Practice are paid for the financial advice and services provided to you, including Professional Private Wealth Pty Ltd's fees;
- details of any conflicts you should be aware of;
- any arrangements or relationships which may influence advice that is provided to you by us;
- how we protect your privacy; and
- the process available to you if you are unsatisfied with the services or advice provided to you.

<Insert if authorised for MDA Services>

In addition, if your Adviser recommends you establish a Managed Discretionary Account (MDA) Service, at the time of the recommendation they will provide you with a Fortnum Private Wealth Ltd Managed Discretionary Account Service Financial Services Guide, which, when an MDA Service is recommended, forms part of our FSG and must be read in conjunction with this document. It will provide information about what an MDA Service is, the documentation you should receive, the risks of an MDA Service, the fees and costs associated with the MDA Service and other important information.

It's important that you take the time to read the information provided so that you can make an informed decision about whether to use the services offered by us. If you need any clarification on what you have read, please don't hesitate to contact us. We are committed to having open and honest communication with you at all times, as this is the foundation of good advice and a successful ongoing relationship.

References in this FSG to:

- "We", "our" and "us" means Fortnum, your Adviser or Capital Wealth Management Pty Ltd.
- "Advice document" means Statement of Advice or Record of Advice.

Capital Wealth Management Pty Ltd, as an Authorised Representative of Fortnum, is authorised by Fortnum to distribute this FSG to you.

You should note that Fortnum acts for you when your Adviser provides services to you. Further, if you take out or renew an insurance product as part of the services provided to you, neither Fortnum nor your Adviser acts for the insurer, whether under a binder (i.e. a power to commit the insurer to an insurance policy), or otherwise.

Fortnum Private Wealth Ltd

Fortnum, as an Australian Financial Services Licensee, brings together many like-minded financial advisers who share a “client-first” approach. Our name comes from a combination of two words – fortress and numbers. This represents our duty to you, the client – our dedication to protecting your financial security and our strength in numbers.

Fortnum is owned by current and former:

- Principal Practices and Advisers (or their related entities);
- Fortnum staff; and
- Fortnum contractors.

How does Fortnum maintain adviser standards?

Each Fortnum Adviser is required to undertake continuous professional development. Fortnum hosts regular training programs on areas such as legislative changes to the taxation, social security, superannuation and investment environments. Our education and training philosophy is one of continually raising the bar.

Each Fortnum Adviser has direct access to technical, risk and investment research professionals who can provide additional analysis on strategy and products so that we can deliver quality advice to you. Risk management specialists monitor and regularly audit each Fortnum adviser to maintain high-quality advice standards.

Who is responsible for the advice I’m given?

Fortnum is responsible for any financial advice or services your Adviser provides under our Australian Financial Services Licence.

Financial services and products Fortnum can provide

Fortnum is licensed to provide financial product advice and deal with the following products:

- Deposit and payment products
- Debentures, stocks or bonds issued or proposed for issue by a government
- Derivatives
- Life investment or life risk products
- Interests in managed investment schemes, including Investor Directed Portfolio Services (IDPS or ‘Wrap’)
- Managed Discretionary Account (MDA) services
- Retirement savings accounts
- Securities
- Standard margin lending facilities
- Superannuation (including Self-Managed Super Funds)

A wide range of financial products from various product providers are available and are thoroughly researched by qualified research professionals including, but not limited to, Innova Asset Management, Zenith, and Morningstar. Your Adviser is only authorised to advise on products which are approved by Fortnum for use. Your Adviser will only recommend a product to implement your strategy after considering its suitability in relation to your individual objectives, financial situation, and needs.

Who is Capital Wealth Management Pty Ltd?

Our Practice has been established to provide a range of wealth advice and expertise to assist clients with every aspect of their financial situation. Our firm has a disciplined approach to helping you build and manage your plan for financial independence.

Capital Wealth Management Pty Ltd's Advisers Authorisations and Service Offering

The below table summarises the areas in which our Advisers are authorised to provide financial product advice to you.

Authorisation	Joel Lewis
Deposit and payment products	✓
Debentures, stocks or bonds issued or proposed to be issued by a government	✓
Derivatives	✗
Life Investment or life risk products	✓
Interests in managed schemes, including investor directed portfolio services	✓
Managed Discretionary Account (MDA) services	✓
Retirement savings accounts	✓
Securities	✓
Superannuation	✓*
Standard Margin Lending facility	✗

- Excluding Self-Managed Super Fund advice

Capital Wealth Management Pty Ltd is registered with the Tax Practitioners' Board as a Tax (Financial) Adviser. This means that all Advisers of Capital Wealth Management Pty Ltd can provide tax advice in regard to the strategies and financial products that they recommend to you.

The table below summarises the services our Advisers can provide to you:

Services Offered	Joel Lewis
Investment Strategies including gearing and savings plans	✓
Budget and cash flow planning	✓
Debt Management	✓
Superannuation advice, including salary sacrifice and consolidation strategies	✓
Self-Managed Super Fund	✗
Personal insurance strategies	✓
Centrelink / DVA advice	✓
Retirement planning advice	✓
Estate planning advice	✓
Advice on ownership and structures eg Discretionary and family trusts	✓
Portfolio Review Services	✓
Ongoing advisory services	✓

Capital Wealth Management Pty Ltd's Advisers may also engage by referral the use of specialists such as accountants and solicitors.

Capital Wealth Management Pty Ltd's Advisers

Adviser Name	Joel Lewis
Qualifications	<ul style="list-style-type: none">• Bachelor of Commerce (Financial Planning and Management)• ALPA
Authorised Representative Number	xxxxxx
Memberships	
Bio	Please complete

Capital Wealth Management Pty Ltd's Advice Process

Capital Wealth Management Pty Ltd has a comprehensive advice process in place designed to ensure that the advice provided is suited to your needs and financial circumstances.

In summary:

Please ensure the below is an accurate reflection of your advice process.

1. Getting to know you

It's all about you. When you meet with your Adviser, they will discuss your expectations, help you to identify your financial goals and provide you with details of the services that they can offer. During this meeting and/or at a follow-up meeting, they may also gather information about your financial situation, needs and objectives and your risk profile and ascertain what the scope of the advice to be provided will be. Your consent and agreement on the scope of the advice will be documented via a Letter of Engagement.

If you do not wish to provide the information, they require to formulate their recommendations, your Adviser will advise you about the possible consequences of not having disclosed your full personal information and the impact on the recommendations given. You should consider these implications carefully.

2. Developing strategies and providing you with advice documents

Initial advice

Your Adviser will formulate a strategy to help achieve your needs and objectives and will put together any personal advice in a Statement of Advice (**SoA**). A SoA sets out the scope of the advice, your current personal and financial position, the basis for the advice and how it addresses your needs and objectives. It will also disclose the fees and charges payable by you and the remuneration and other benefits we may receive.

The SoA will also make reference to any potential conflicts of interest that you need to be aware of when deciding whether to rely on the advice. Your Adviser will explain any risks associated with implementing the recommendations. Please ask your Adviser to clarify any risks you do not understand.

Further advice

Where a further review is conducted or ad-hoc advice is requested from you and personal advice is provided, the advice may be provided via a new SoA or a Record of Advice (**RoA**) as applicable to the circumstances. Further advice may be in the form of a RoA where the further advice does not significantly differ from the original advice provided.

Where further advice is provided, and if you have not already been provided with a copy of the new advice document, then you may, for a period of seven years after the further advice was first provided to you, request a copy of your advice document. This can be done by contacting your Adviser in writing, by email or by telephone.

Product Disclosure Statement

If your Adviser recommends a product as part of your financial strategy, they will provide you with the relevant Product Disclosure Statement (**PDS**). The purpose of a Product Disclosure Statement is to assist you in making a decision about the particular financial product. It contains information about the product's key features, benefits, risks, and fees.

3. Gaining your consent to proceed

Your Adviser will discuss their recommendations with you, make any changes you require and gain your agreement to implement those recommendations. They will then implement those recommendations.

4. Keeping you on track

To ensure that the advice your Adviser provides you with continues to meet your financial situation, needs, and objectives, we can provide an ongoing review service which provides regular reviews and written reports on the valuation and status of your investment portfolio.

If you wish to take up this service, please contact your Adviser so they can provide more information and outline their fees.

If your Adviser recommends, and you enter into, an ongoing review service, for a period of more than 12 months:

- You will receive a Fee Disclosure Statement (FDS) each year. It will outline the fees paid and the services you received in the preceding 12 months.
- You may also receive an Opt-in Notice every two years along with your FDS. This document will ask you to confirm that you would like to continue the ongoing service review with your Adviser.

Instructing your Adviser

At times, you may wish to make changes without receiving advice. In these cases, we can take your instructions by telephone, email or in person at Capital Wealth Management Pty Ltd's office you are dealing with 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. Once implemented, we will provide you with a Statement of Transaction (**SoT**), which confirms your instructions, informs you that no advice has been provided and discloses any fees and charges payable by you, as well as any benefits we may receive.

Charging options

The remuneration and other benefits listed below generally cover what Fortnum, your Adviser, Capital Wealth Management Pty Ltd and any related parties may receive as a result of the services provided to you. Specific amounts and benefits can often only be calculated once the recommendations are made to you.

There are various ways that you may pay Fortnum for the services we provide to you, including:

- Fee for service - where you pay a fee for the services that we provide;
 - Commission (paid by product and service providers) in the form of initial (up-front) and/or ongoing (trail) commission; or
 - A combination of commission and fee for service.

Each of these is discussed in further detail below.

Fee for service

Fee for service payments may be payable for:

- **Preparation of advice and initial advice:** We may charge fees for the preparation, presentation and/or implementation of our advice to you. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement on the fees, in the form of a Letter of Engagement, before we provide you with advice. The fee will also be disclosed to you in your advice document.
- **Ongoing adviser services:** We may charge a fee for the services provided on an ongoing basis commencing from the implementation of the recommendations contained in the advice document. The amount and the services included will be determined in consultation with your Adviser.
- **Ongoing review and advice services:** We may charge a fee to provide ongoing portfolio reviews, including further advice suitable to your needs. This fee will be determined in consultation with your Adviser and documented in an Ongoing Service Agreement.

In all instances, your Adviser will discuss the calculation of the fees when you meet and agree on the services to be provided. Fees charged are generally payable after the services have been provided, however, ongoing adviser service fees are generally paid in advance. The agreed fees may be documented in a Letter of Engagement, set out in a Statement of Advice, or in a Record of Advice.

How are fees for services calculated and paid?

Fees charged for our services may be:

- a dollar amount;
- a percentage of the amount invested;
- an hourly rate; or
- a combination of some or all of the above, as agreed with you.

Payment of fees for services

We will discuss and agree on the method of payment with you before we provide you with our services. Generally, we will either invoice you directly, or deduct from your investments, or adopt a combination of these methods for the fees payable. Cash transactions will not be accepted.

The fee for service may be determined by any of the following:

Fees will be agreed based on your requirements and the complexity of your financial circumstances. All fees charged will be fully detailed in the Letter of Engagement or Statement of Advice you receive and will be agreed with you prior to you becoming liable for them. All fees are inclusive of GST.

If your Adviser receives a proportion of this remuneration directly attributable to the advice and/or service they have provided you, they will inform you of the amount at the time they provide you with advice.

Commissions on group life insurance products

Fortnum does not receive any initial or ongoing commission on group life insurance products held through superannuation including employer, corporate or industry superannuation plans. However, existing commission arrangements are grandfathered and will continue to be paid if the product was entered into before 1 July 2014. In instances where we advise that you retain such products, we will continue to receive any existing ongoing commissions that are payable.

In respect of all other life insurance products apart from group insurance plans held through superannuation, Fortnum may receive payments in the form of initial commissions and/or ongoing commissions from the product providers for any product you choose to use that is recommended by us. These commissions are included in the fees and/or premiums you pay for the product. You do not pay these fees to us directly. We may rebate some or all of this to you.

How are commissions (initial and ongoing) from a life insurance product and service provider calculated and deducted?

For all insurance policies applied for before 1 January 2018 and in force before 31 March 2018
Initial commission from a life insurance provider is typically up to 125% of the first year's premium that you pay. Ongoing commission can be up to 35% of the premium from year two onwards for the life of the policy.

The actual commission that will be received by Fortnum and Capital Wealth Management Pty Ltd will be disclosed to you in your Statement of Advice, Statement of Transaction or Record of Advice.

Example

If you pay \$1,000 p.a. in premium for a life insurance product recommended to you and the applicable initial commission is 125%, then Fortnum will receive initial commission of \$1,250 (i.e. $\$1,000 \times 125\%$). Fortnum may then pass on anywhere up to the full amount, \$1,250 in this example, to the Principal Practice.

Example

If you pay \$1,000 p.a. in premium for a life insurance product recommended to you and the applicable initial commission is 125%, then Fortnum will receive initial commission of \$1,250 (i.e. $\$1,000 \times 125\%$). Fortnum may then pass on anywhere up to the full amount, \$1,250 in this example, to the Principal Practice.

For all insurance policies either applied for after 1 January 2018 or applied for before 1 January 2018 and not in force before 31 March 2018
Initial commission from a life insurance provider is typically up to 88% (inclusive of GST) of the first year's premium that you pay. Ongoing commission can be up to 38.5% (inclusive of GST) of the premium from year two onwards for the life of the policy.

The actual commission that will be received by Fortnum, Capital Wealth Management Pty Ltd, and your Adviser will be disclosed to you in your Statement of Advice, Statement of Transaction or Record of Advice.

Example

If you pay \$1,000 p.a. in premium for a life insurance product recommended to you and the applicable initial commission is 80%, then Fortnum will receive initial commission of \$800 (i.e. $\$1,000 \times 80\%$). Fortnum may then pass on anywhere up to the full amount, \$800 in this example, to the Principal Practice.

<include only if applicable>

TAL Business Partner Program

Capital Wealth Management Pty Ltd has been invited to participate in the TAL Business Partner Program. Participation in this program means that Capital Wealth Management Pty Ltd may be entitled to a bonus payment based on the \$ amount of all insurance premiums that were in force pre- 1 January 2018 and the total amount of lapsed premiums for all clients with TAL insurance policies on a rolling 12 month period.

If any adviser within Capital Wealth Management Pty Ltd recommends the retention, application for or modification of a TAL insurance policy, details of how this bonus is calculated will be provided to you in your Advice Document.

Commissions on investment products

Generally, Fortnum does not receive initial or ongoing commissions in respect of investment products. However, there are some products which continue to pay commissions where the product was entered into before 1 July 2014. In instances where we advise that you retain such products, we will continue to receive any existing ongoing commission that is payable.

All remuneration percentage rates paid from the product and service provider are dependent upon the specific products you hold and are inclusive of GST where applicable. Specific details of the commission paid from the product and service provider will be fully disclosed in your advice document.

Remuneration received by Capital Wealth Pty Ltd

All fees for services paid by you and/or commission paid by product and service providers are paid to Fortnum. Fortnum pays an amount to its Principal Practices, which depends on the gross revenue generated by the Principal Practice over the previous 12 months. Capital Wealth Management Pty Ltd may receive up to 100% of the fees or commissions received. Capital Wealth Management Pty Ltd may share part of this amount with your Adviser.

Your Statement of Advice, Statement of Transaction or Record of Advice will provide further details of amounts paid to Fortnum, Capital Wealth Management Pty Ltd, and your Adviser.

Commissions may be paid by product and service providers to Fortnum, who, in turn, may pay a proportion of this to Capital Wealth Management Pty Ltd.

If your Adviser receives a proportion of this remuneration, they will inform you of the amount at the time they provide you with advice.

Adviser Remuneration

This section should be amended as appropriate for your Practice.

Option 1

<name of Advisers who are employees> **is/are** an employee of Capital Wealth Management Pty Ltd and has been appointed as an authorised representative of Fortnum.

<name of Adviser/These Advisers> may be remunerated by one or more of the following methods. If any are relevant to the advice provided to you, further details will be set out in your advice document.

- Your Adviser may be paid a salary based on experience, capability and responsibilities within Capital Wealth Management Pty Ltd.

- Your Adviser may be eligible to receive a bonus based on a combination of revenue and other non-financial measures that relate to compliance, staff training and the quality of service.

Option 2

<name of Advisers who are employees> is/are a director/shareholder of Capital Wealth Management Pty Ltd and has been appointed as an authorised representative of Fortnum.

<name of Adviser/These Advisers> may be remunerated by one or more of the following methods. If any are relevant to the advice provided to you, further details will be set out in your advice document.

Your Adviser may be paid a salary based on experience and capability.

Your Adviser may be eligible to receive a bonus based on a combination of revenue and other non-financial measures that relate to compliance, staff training and the quality of service.

Your Adviser may receive dividends and/or distributions as a shareholder of Capital Wealth Management Pty Ltd.

If the above wording does not cover your Capital Wealth Management Pty Ltd.'s arrangements, please contact operations@fortnum.com.au

Making and Receiving Referrals

We may provide you with a referral to other professionals. This may include, but is not limited to, accountants, mortgage brokers and legal practitioners. You may also have been referred to us by another professional.

Please use at least one of the following options, tailored to your specific circumstances.

Option 1

We may receive a payment for these referrals. If we are entitled to receive a referral payment, we will disclose this to you at the time of the referral.

We may give a payment for referrals to us. If this is the case, we will inform you of this payment prior to the referring party being entitled to the payment.

Option 2

We will not receive any referral payments for referrals we make.

We will not make any referral payments for referrals we receive.

Option 3

We have referral agreements in place with the following referral partners:

<name of referral partner> <payment made to whom for referrals> <amount of payment or how payment is determined>.

Option 4

Your Adviser or Capital Wealth Management Pty Ltd may refer you to <name of entity/ies>. This company is owned/majority owned by <name of owners>.

Option 5

Your Adviser or Capital Wealth Management Pty Ltd may refer you to <name of entity/ies>. This company is a related entity to Capital Wealth Management Pty Ltd due to <reason for related entity>.

Option 6

Capital Wealth Management Pty Ltd may refer you to AIA Australia in relation to Private Health Insurance under their MyOwn brand. If, after speaking with the MyOwn team, you take out Private Health Insurance with them, Capital Wealth Management Pty Ltd will receive a referral fee of 20% of the first year's premium, plus GST. This is at no additional cost to you.

Other forms of remuneration or benefits

Fortnum, your Principal Practice and/or Adviser may be entitled to other benefits when providing services to you.

Fortnum, your Principal Practice and Adviser keep registers of small value benefits (i.e. \$100 to \$300 in value) which may be received by them from product and service providers. These benefits are permissible unless they are received frequently or when similar benefits received combine to exceed \$300 per annum. If you would like a copy of the register, please ask your Adviser and it will be made available to you within seven days.

If your Adviser is an accountant who is subject to the Accounting Professional and Ethical Standards, under APES 230, all benefits received, regardless of value, will be recorded on their register.

1. Payments from product and service providers

Fortnum receives payments from a number of product and service providers of up to 0.40% (inclusive of GST) per annum of amounts invested with the relevant providers before 01 July 2014. Of the amount received, Capital Wealth Management Pty Ltd receives 60% and the balance is retained by Fortnum and is used in paying its expenses.

As at the date of this FSG, Fortnum receives payments from the following product and service providers: OnePath, Colonial, Navigator, Man Invest, IOOF and Life Risk Partnership.

Example

If the total revenue generated under the partnership agreements with a particular provider is \$1000.00, the Principal Practice receives \$600.00 (i.e. \$1000.00 x 60%) and Fortnum retains the balance of \$400.00.

Include this section if relevant

Fortnum Advice Platform Trust (FAP Trust)

Fortnum Advice Platform Trust (FAP Trust) is an entity that sponsors a financial product called "Fortnum Advice Wrap" which is administered by BT Portfolio Services. All payments (sometimes referred to as rebates) received by Fortnum in respect of investments through the Fortnum Advice Wrap are held by the FAP Trust. Of this amount, the FAP Trust distributes payment to Principal Practices (or their related entities) and Fortnum staff holding units in the FAP Trust.

FAP Trust was established to facilitate rebates paid by BT to Fortnum in relation to client accounts established with BT (ie in BT Wrap and Fortnum Advice Wrap) on or before 30 June 2013. FAP Trust distributes these rebates in a manner as defined within the FAP Trust deed.

Your Adviser, Capital Wealth Management Pty Ltd or a related entity holds Class A and / or Class C units in FAP Trust which gives them an interest in benefits distributed by FAP Trust. Class A unit holders receive a share of 60% of the distributions by FAP Trust in proportion to the gross revenue of FAP Trust referable to clients of Capital Wealth Management Pty Ltd. Class C unit holders receive a share of 20% of distributions in proportion to the number of units held.

Example

If \$100,000 revenue is generated from investing with Fortnum Advice Wrap, the Trust will distribute 60% to its Principal Practices who hold Class A units in the trust (i.e. $\$100,000 \times 60\% = \$60,000$). A further 20% is distributed to participating staff who hold Class B units in the trust (i.e. $\$100,000 \times 20\% = \$20,000$). The remaining 20% is distributed to the holders of Class C units which are held by both Principal Practices and participating staff (i.e. $\$100,000 \times 20\% = \$20,000$).

<only insert if applicable>

3. Payments from the Aviate Group

Fortnum receives a referral payment of 1% of the purchase price of any property purchased as a result of a referral to the Aviate Group. Fortnum deducts its fee as detailed in the paragraph above headed 'Remuneration received by Capital Wealth Management Pty Ltd' and pays the balance to Capital Wealth Management Pty Ltd.

Professional Indemnity Insurance

Fortnum is covered by Professional Indemnity insurance satisfying the requirements under section 912B of the Corporations Act (2001) relating to insurance obligations.

Our insurance arrangements cover claims made against us as the Licensee and for the conduct of any Fortnum adviser (whilst acting as an Authorised Representative of our Australian Financial Services Licence).

Your privacy

We collect and keep a record of your personal information, including sensitive information (e.g. information about your health), in order to provide you services including financial advice.

We may also use the information we have collected in order to comply with any legislative or regulatory obligations we have and to help us run our business.

Fortnum is committed to the confidentiality and security of your personal information.

It will be necessary for us to collect, use and disclose your personal information. If you do not consent to this, or we are unable to collect all the necessary personal information, we will not be able to provide you with the relevant financial planning and advice services.

In most cases, we collect personal information directly from you. In other cases, however, we may collect your personal information from third parties. The third parties we may collect from include, but are not limited to: your accountant, your lawyer or solicitor, other financial services institutions, insurance providers and any other third parties where you have provided consent.

In order to manage and administer our financial planning services, it may be necessary for us to disclose your personal information to third parties. The parties to whom we may disclose your personal information include, but are not limited to: financial institutions for the provision of financial products, such as investments, superannuation, and life insurance; auditors; third parties providing mailing services, administration support, maintenance of our information technology systems, printing of our standard documents and correspondence, research services; any government or regulatory body for whom we have a legal obligation to provide this information to; referral partners.

It is possible that an organisation listed above may disclose your personal information to overseas recipients, but it is not possible for us to provide any further details of that in this document.

We may disclose your personal information to an entity which is located outside of Australia, to enable them to undertake specified services on behalf of Fortnum, your Adviser or Capital Wealth Management Pty Ltd. **Where applicable** In addition, Capital Wealth Management Pty Ltd/**Name of Adviser** may disclose your personal information to overseas recipients in order to access services they provide, such as paraplanning and administration.

Details of this can be found in the Fortnum Privacy Policy, which includes details of how you may access, and seek correction of, your personal information which we hold. It also includes details of how you may complain if you believe that we have breached the Australian Privacy Principles under the Privacy Act and how we deal with such complaints.

You may obtain a copy of the Fortnum Privacy Policy by telephoning us on (02) 9904 2792 or by visiting our website at www.fortnum.com.au

If you use overseas recipients or if you have a privacy policy

In addition to the Fortnum Privacy Policy, **Capital Wealth Management Pty Ltd** also has its own Privacy Policy. You may obtain a copy of **Capital Wealth Management Pty Ltd's** Privacy Policy by telephoning us on **XXXXXX** or by visiting our website at **www.XXXX.com**.

Further details around how **Capital Wealth Management Pty Ltd** manages privacy are available at **www.XXXXX.com** and/or by calling us on **XXXXXX**.

You can authorise another person to act on your behalf, to receive information and/or undertake transactions. Both requesting this to occur, and removing this authorisation, are required to be

notified in writing.

Where your Adviser becomes a representative of, or sells their business to, another Australian Financial Services Licensee, Fortnum may also use and disclose the information collected about you to enable your Adviser or the new business owner to continue to provide you with financial products and services.

We collect your personal information as permitted by, and in accordance with, the Privacy Act. Other legislation may also apply, such as the Anti-Money Laundering and Counter-Terrorism Financing Act.

What to do if you have a complaint

- 1) If you are unhappy with the advice or service provided by your Adviser, Capital Wealth Management Pty Ltd, or Fortnum, you can let us know by putting your concerns in writing and sending them to:

	By emailing us at:	By calling us on:
Complaints Officer Fortnum Private Wealth P.O. Box 1988 North Sydney NSW 2059	operations@fortnum.com.au	(02) 9904 2792

We will investigate your complaint and respond to your concerns as quickly as possible and within 45 days.

- 2) If we have not responded to your complaint within 45 days, or if you feel it has not been resolved to your satisfaction, you may refer your concerns to the Australian Financial Complaints Authority (AFCA), which provides an accessible, fair and independent dispute resolution service.

You can contact AFCA at:

	Online at:	By emailing at:	By calling on:
Australian Financial Complaints Authority Limited G.P.O Box 3 Melbourne VIC 3001	www.afca.org.au	info@afca.org.au	info@afca.org.au

- 3) You can also contact the Australian Securities and Investments Commission (ASIC). ASIC is Australia's corporate, markets and financial services regulator. ASIC contributes to Australia's economic reputation and wellbeing by ensuring that Australia's financial markets are fair and transparent, supported by confident and informed investors and consumers.

You can contact ASIC at:

	Online at:	By calling on:
Australian Securities and Investments Commission P.O. Box 4000 Gippsland Mail Centre Victoria 3841	www.asic.gov.au	1300 300 630

Conflicts you should be aware of

Relationships and associations

The extensive list of products and services approved by Fortnum includes products and services provided by entities with whom Fortnum director, employee, Capital Wealth Management Pty Ltd and/or your Adviser have a relationship or association, either directly or via a related entity.

We believe that your interests should be placed first and that products and services should only be recommended if it is in your best interests. However, it is important that you know of, and are comfortable with, those relationships and associations and any benefits that arise.

Include any related party relationships that need to be disclosed. Example text is provided.

<Company/ies for which there is a related party relationship>

<name of Adviser> is a director/shareholder in <name of company>. Capital Wealth Management Pty Ltd may refer you to <name of company> for <name of service>.

<name of company> is a related entity to Capital Wealth Management Pty Ltd due to <nature of relationship>. Capital Wealth Management Pty Ltd may refer you to <name of company> for <name of service>.

Associations and Directorships

XXXXX is a Director and shareholder of XXXXX Pty Ltd & XXXXX Pty Ltd.

<Name> may be entitled to receive dividends and director fees from these companies

Your Adviser, Capital Wealth Management Pty Ltd or a related entity is a shareholder and/or a director in the following entities which may receive a direct benefit from any financial product advice or services that are provided to you:

- XXXX Pty Ltd – Director & shareholder