



Financial Services Guide (Part One)

28 September 2017

About this Financial Services Guide

This Financial Services Guide (FSG) is designed to help you to decide whether to use our services as set out in this FSG. It comes in two parts. This is Part One. Part One contains information about the financial planning and advisory services that Total Financial Solutions Australia Limited (TFSA) provides as well as our Privacy Policy. It also describes how we and your Adviser are paid and what you can do if you are unhappy with our services.

It should be read in conjunction with FSG Part Two which contains information about your individual Adviser and the services that they can provide to you. If you do not receive Part Two with this document, please ask your Adviser to provide it to you or contact us.

About Total Financial Solutions

Who is TFSA?

Total Financial Solutions Australia Limited (TFSA) is an Australian Financial Services Licensee established in 2010 with a network of over 80 financial planners distributed across 50 self-employed practices throughout Australia, providing financial services to around 50,000 Australians. TFSA practices have the experience, knowledge and resources to help manage and grow your wealth.

TFSA believes our practices are uniquely positioned to offer superior advice and service to their clients, by providing choice and flexibility. Our practices offer personal advice tailored for each client who is treated as a valuable customer.

TFSA is a member of the Association of Financial Advisers (AFA). As a member of this organisation, we are committed to operating in accordance with their Code of Ethics and Rules of Professional Conduct.

TFSA holds an Australian Financial Services Licence Number 224954. TFSA and TFSA's operating company, TFS Operations Pty Ltd, are wholly owned subsidiaries of Countplus FS Holdings Pty Ltd (Countplus Holdings). All entities are domiciled in Australia.

Who is your Adviser?

Your Adviser is the person named in FSG Part Two.

TFSA has appointed your Adviser as its Authorised Representative to provide financial advice and services to you. TFSA is responsible for the services that your Adviser provides.

Both TFSA and your Adviser act for you when providing financial advice and recommending financial products.

Total Financial Solutions Australia Limited

ABN: 94 003 771 579

Level 11, 309 George St, Sydney NSW 2000

Free call: 1800 655 331 Phone: +61 2 8297 1600 Fax: +61 2 8297 1699

Email: info@tfsa.com.au

www.tfsa.com.au

About Our Services

What financial services can we offer?

We hold an Australian Financial Services Licence that authorises us to provide advice and deal in the following products:

- Deposit and payment products
- Debentures, stocks or bonds issued by a government
- Life products (including life risk insurance and investment life insurance products)
- Managed investment schemes (including investor directed portfolio services)
- Retirement savings accounts
- Securities
- Standard margin loans
- Superannuation

How will we prepare and provide you with suitable financial advice?

We have a 7 step process for providing you with financial advice that is appropriate for your personal circumstances:

1. **Meet with you for an initial consultation.** During this meeting we will make enquiries about your expectations, provide you with full details of the services we are authorised to provide, identify if we are not able to deliver services to you and inform you of our pricing policy.
2. **Collect all the information needed from you.** We call this fact finding. This involves asking questions about your personal circumstances including helping you to determine your attitude towards risk (where appropriate). You are not required to provide any information to us if you do not wish to do so. However, if you do not, the advice we provide may not be appropriate for you.
3. **Help you identify your goals and current financial position.** This includes detailing constraints which may affect our advice to you.
4. **Consider appropriate financial strategies and issues.** We may analyse and review your wealth accumulation, retirement, pension, taxation, social security and estate planning requirements. We may also review your existing investment, superannuation or insurance products. We will develop recommendations and deliver these to you in a Statement of Advice.
5. **Discuss the recommendations with you.** We will help you to understand our recommendations and seek your approval to implement the recommendations that you wish to proceed with.
6. **Implement the agreed recommendations.** We will assist in the completion of the required application forms.
7. **Review** your objectives, financial situation and needs, if this service has been agreed to with your adviser.

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What documents might you receive?

Statement of Advice (SoA)

If we provide you with advice about your personal financial circumstances, we will normally give you a SoA. This will confirm the advice we have given and is designed to assist you to decide whether to act on our recommendations. The SoA will also explain our fees for giving the advice and arranging the financial products that we have recommended. You can request a copy of the SoA up to 7 years after the Adviser originally gave you the advice.

Record of Advice (RoA)

On an ongoing basis, a RoA will may be provided instead of a SoA if there has been no significant changes in your personal circumstances or, the basis of the advice has not significantly changed since your last SoA was provided. You have the right to request a copy of the RoA from your Adviser at any time.

Fee Disclosure Statement (FDS)

If you have entered into an ongoing fee arrangement with your Adviser for a period of more than 12 months, you will also receive a Fee Disclosure Statement (FDS) on an annual basis. The FDS will contain details for the previous 12 month period of the services you were entitled to receive, the services you actually received and the fees which were paid.

Product Disclosure Statement (PDS)

If we recommend or arrange for the issue of a financial product (other than securities), we will provide you with a PDS containing information about the product, such as its features and risks.

How can you provide instructions?

We prefer you to provide your instructions to your Adviser in writing. However, if the matter is urgent you may provide instructions by telephone and confirm them in writing.

What information will we keep about you and can you access it?

Your privacy is important to TFSA. We use the information you provide to advise you about your financial circumstances, goals and strategies. We only provide your information to the product providers with whom you choose to deal (and their representatives). We do not trade, rent or sell your information.

If you would like to examine your file, we will make arrangements for you to do so, advising you of the costs (if any).

To learn more about the collection and use of your personal information by TFSA (for marketing and other purposes), see our Privacy Policy Statement contained herein.

In addition, as a financial services provider, TFSA has an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act 2006 (Cth) to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passports and driver's licences. We will also retain copies of this information.

Your personal information will be held securely. We cannot provide you with services if you are unwilling to provide this information.

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Remuneration

How are we paid and remunerated?

Your Adviser and TFSA will be remunerated for the financial services we provide to you through any of the methods or a combination of the methods detailed below:

1. A fee for the initial and/or ongoing services provide to you. These may be charged directly to you, or deducted from a product.
2. Other remuneration and benefits paid directly by the product providers whose products we recommend; and/or
3. A small share of the fees charged by the platform that administers your investments.

Your Adviser will discuss and agree their pricing policy, remuneration methodology and payment expectations with you before you accept their recommendations. The remuneration will be fully set out in your SoA.

Fee for Service

Your Adviser may charge a fee or hourly rate for services provided to you. This will be agreed with you and your Adviser before the services are provided.

Other Remuneration and Benefits

On 1 July 2013 the “Future of Financial Advice” legislation (FOFA) came into effect. FOFA prohibits TFSA and its Advisers from accepting “conflicted remuneration”, subject to certain exceptions.

Under FOFA, “conflicted remuneration” is any benefit, monetary or non-monetary, that could reasonably be expected to influence the choice of financial product recommended or the financial product advice. This includes commissions, bonuses and rebates, and most volume-based benefits. There are some exceptions including remuneration for retail life insurance products.

Under the new legislation, TFSA and your Adviser may continue to accept conflicted remuneration for arrangements that were in place before 1 July 2013 (please note: and to add new clients to these existing arrangements up until 30 June 2014).

TFSA or your adviser may continue to receive benefits outlined below where arrangements were entered into prior to 1 July 2013.

When TFSA arrange an investment or insurance solution for you, we may receive remuneration from the product provider. The amount varies depending on the type of product. TFSA retains between 1-10% of the remuneration and the rest is paid to your Adviser.

Investment Products

For investment products an adviser may agree an initial fee with you of up to 5.5% (GST inclusive) of your initial investment. If this pricing methodology is applied to you, the initial fee will be deducted from your investment. Where an asset based service fee is agreed, your adviser may charge an agreed dollar amount or a fee defined as a percentage of your funds under advice, to be debited from your investments on an ongoing basis.

Example: If your Adviser recommends an investment of \$10,000 with initial remuneration of 4.4% (GST inclusive) and ongoing remuneration of 0.55% per annum (GST inclusive), TFSA will receive \$440 as an initial payment, of which between 90-100%, will be passed on to your Adviser. Also, TFSA will receive ongoing payments of \$55 per annum, of which between 90-100%, will be passed on to your Adviser (assuming the investment remains at the same amount). Your Adviser will specifically ask you to agree to pay these fees before they are charged.

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Insurance Products

For life insurance, our remuneration is included in the amount you pay for the insurance. We may receive between 0-124% (including GST) of the initial annual premium and ongoing remuneration of between 0-33% p.a. (including GST) of the annual premium.

Example: If your Adviser recommends an insurance product and the annual premium is \$400 per annum, TFSA may receive an initial payment of up to \$496, of which between 90-100% will be passed on to your Adviser. Also, TFSA will receive ongoing payments of up to \$132 per annum, of which between 90-100%, will be passed on to your Adviser (assuming the premium remains the same).

TFSA is a member of the Partnership Programs of One Life, Macquarie Life, TAL, Navigator, NetWealth, Asteron Life and Commlnsure Life. Whilst each program is different, our participation entitles TFSA to receive additional commission should we meet specific new business, in-force and client retention targets. The TFSA bonus could vary between 0% to 15% of the premium value of in-force policies.

For example, if the maximum payment was achieved, and with in-force policy premiums of \$100,000 TFSA would receive \$15,000. Your Statement of Advice will contain more specific disclosure if our recommendation to you is part of a life company partnership program.

Other Benefits

Your adviser may receive alternative forms of remuneration from time to time. Non-monetary benefits received by your adviser from \$100 to \$300 in value will be recorded by TFSA in a register. Non-monetary benefits worth more than \$300 may be considered "conflicted remuneration" under FOFA unless they are covered by an exception e.g. for education and training.

TFSA and your Adviser believe a client's interests should be placed first and your Adviser will always act and provide advice which is in your best interests.

You have a right to request further information in relation to the remuneration, the range of amounts or rates of remuneration, and soft dollar benefits received by the licensee and/or Adviser. The information will be made available to you within seven days of your request.

If our remuneration differs in any way from the arrangements set out above, further information will be provided in Part Two of this FSG and full details of all remuneration will be provided in the SoA issued to you by your Adviser.

Referral fees

If a third party refers you to your Adviser, the referrer may receive a referral fee, rebate or non-monetary benefit. Similarly your Adviser may receive benefits if they refer you onto another party.

This is not an additional cost to you. All referral relationships and payments will be disclosed in Part Two of this FSG and/or the Statement of Advice.

Administration Fees

TFS Operations Pty Ltd distributes the Dominion Superannuation Master Trust and Dominion Portfolio Service investment administration platforms on behalf of Oasis Asset Management Pty Ltd (Oasis).

If your Adviser recommends that you use the Dominion platform to administer your investments, Oasis will pay an approximate amount up to 41% of the member fees and up to 67% of the administration fees that you pay for the administration service to TFS Operations Pty Ltd. TFS Operations Pty Ltd will also receive half of any bonus payment that Oasis receives from fund managers (which are based on the amount placed with the fund managers by TFSA's authorised representatives). These amounts are paid by Oasis and do

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not represent an additional cost to you.

Your Adviser receives 21%, Oasis receives 7% and TFS Operations Pty Ltd receives 5% in remuneration for any life insurance premium that you pay through the Oasis platforms. This will be paid by the insurer.

TFS Operations Pty Ltd also distributes the TotalView SuperWrap and TotalView Wrap administration platforms on behalf of BT Financial Group. If your Adviser recommends that you use the TotalView platform to administer your investments, BT Financial Group will pay TFS Operations Pty Ltd up to 56% of the administration fees that you pay for the administration service. These amounts are paid by BT and do not represent an additional cost to you.

TFS Operations Pty Ltd also distributes the BT SuperWrap and BT Wrap administration platforms on behalf of BT Financial Group. If your Adviser recommends that you use the BT SuperWrap and BT Wrap platforms to administer your investments, BT Financial Group will pay TFS Operations Pty Ltd up to 27.5% of the administration fees that you pay for the administration service. These amounts are paid by BT and do not represent an additional cost to you.

TFS Operations Pty Ltd also distributes the Privilege Portfolio administration platforms on behalf of HUB24 Custodial Services Limited. If your Adviser recommends that you use the Privilege Portfolio administration platforms, HUB24 Custodial Services Limited will pay an approximate amount up to 51% of the administration fee that you pay for administration services to TFS Operations Pty Ltd. Our subsidiary, Countplus Holdings Pty Ltd will also receive up to 0.77% of the Funds Under Advice under Privilege Portfolios as an investment management fee.

If your Adviser recommends that you use the Navigator Personal Retirement Plan or Navigator Personal Investment Plan platform to administer your investments, TFS Operations Pty Ltd (TFS Operations) may receive up to 0.2% of the initial investment. These amounts are paid to TFS Operations by MLC and do not represent an additional cost to you.

The ongoing advice fee structure, your adviser uses is disclosed in Part 2 of the FSG and in any advice documents provided to you by your Adviser.

Compensation Arrangements

How can you be compensated?

TFSA confirms that it has arrangements in place to ensure it continues to maintain Professional Indemnity insurance in accordance with s.912B of the Corporations Act 2001 (as amended) with respect to our authorisations and obligations under our Australian Financial Services Licence.

This insurance will continue to provide such coverage for any authorised representative or employee who has ceased work with TFSA for a minimum of 7 years from the date of ceasing the relationship.

Privacy Policy

TFSA's Privacy Commitment

Your privacy is important to Total Financial Solutions Australia Limited (TFSA). This policy outlines how we manage the personal information we hold about our clients and others. It applies to all members (e.g. Authorised Representatives) of the TFSA group in Australia. It is TFSA's policy to respect the confidentiality of information and the privacy of individuals. TFSA is bound by the Australian Privacy Principles (APPs) which is a part of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988.

TFSA's Privacy Policy will be reviewed from time to time to take steps as are reasonable in the

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Open and Transparent Management of Personal Information

circumstances to implement practices, procedures and systems to ensure it remains compliant with the Australian Privacy Principles. Any information we hold will be governed by the most current TFSA Privacy Policy which will be updated and accessible from our website.

We are committed to being open and transparent about how we use personal information. Where our documents ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed. If any of our documents do not clearly state the purposes for which we will use your personal information please ask us and we will clearly explain them to you.

Why does TFSA collect personal information?

Our business is to understand and meet our clients' needs over their lifetime for a wide range of financial services. To do this effectively, we need to collect certain personal information. We will not collect personal information unless the information is reasonably necessary for, or directly related to the services we provide to you. Our representatives provide financial services (e.g. advice) in relation to a broad range of financial products. They include (but are not limited to):

- life insurance products protecting against risks
- investment products to build wealth
- superannuation and retirement income products to provide for retirement
- banking and other services to provide deposit and credit facilities
- financial planning advice and other services to help individuals understand their financial needs and make financial and investment decisions
- management of investment assets such as shares, property (including shopping centres), fixed interest and cash

Unless informed otherwise, the personal information we hold is mainly used for establishing and managing the financial products or services of our customers, and reviewing their ongoing needs. Collecting personal information also allows us to meet legal obligations we might have including those under the Anti-Money Laundering and Counter-Terrorism Financing Act.

We may also use personal information we have collected for purposes related to those set out above - for example, enhancing customer service and product options and providing our customers with ongoing information about opportunities that may be useful for their financial needs. The use of sensitive information is subject to greater restrictions and is discussed below.

What kind of personal information do we ask for?

Because of the nature of the products and services provided, government regulations and taxation laws, we ask for a range of personal information from our clients. The type of personal information we may collect can include (but is not limited to):

- name
- address
- date of birth
- contact details
- income and expenses
- assets and liabilities
- account balances
- tax and financial statements
- employment details

Means of collection

TFSA will only collect personal information by lawful and fair means and will only request it from yourself. The exceptions to this are:

- if you give us written consent to the collect this information from another specified individual,
- or if we are required or authorised by Australian law, or a court/tribunal order to collect the information from another individual.
- If it is unreasonable or impracticable to do so.

We obtain most of the information directly from our clients through a Confidential Client

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Questionnaire or other forms, and from maintaining records of information provided in the course of ongoing financial planning advice or customer service. We may also obtain information from other sources. We may ask for other information voluntarily from time to time (for example, through market research, surveys or special offers) to enable us to improve our service or consider the wider needs of our clients or potential clients.

Some insurance plans and other contracts also require us to collect sensitive information. For more details, see the section 'Sensitive information is subject to greater restrictions'. If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

Notification of collection

Where our documents ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed. If any of our documents do not clearly state the purposes for which we will use your personal information please ask us and we will clearly explain them to you.

If your personal information is obtained from third parties, we will inform you of this.

Dealing with personal information

We will not use your personal information for any purpose other than for which it was originally collected, unless you have given us your consent to do so, or unless it is reasonably expected that we will use the information for another purpose (a secondary purpose). An example of a secondary purpose is providing information in a court of law or dispute resolution.

Dealing with unsolicited personal information

Should we receive personal information that we have not asked for, we will establish whether the information could have been accessible and contained in a Commonwealth record and if the collection of this personal information was reasonably necessary or directly related to our service. Should the above not apply, we will as soon as practicable destroy the information.

Direct marketing

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy. Unless you are informed otherwise, the personal information we hold is used for establishing and managing your financial products or services, reviewing your ongoing needs, enhancing customer service and product options and giving you ongoing information or opportunities that we believe may be relevant to your financial needs and other circumstances.

If, at any time, you do not wish to receive this information, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a register for those individuals not wanting direct marketing material. Please refer to the end of this document for our contact details.

Cross-border disclosure of personal information

TFSA takes its obligations to protect your information seriously, this includes when we operate throughout Australia and overseas. As part of our operations some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. We will obtain your consent prior to doing so.

Adoption, use or disclosure of government related identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

How do we use this information and who may we disclose it to?

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- other members of the TFSA group who provide financial and other services
- financial planners, brokers and those who are authorised by TFSA to review clients' needs and circumstances from time to time
- service providers and specialist advisers to TFSA who have been contracted to provide TFSA with support, administrative, financial, insurance, research or other services

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- other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law
- credit reporting or reference agencies or insurance investigators
- anyone authorised by an individual, as specified by that individual or the contract

Generally, we require those organisations outside the TFSA group who handle or obtain personal information as service providers to TFSA acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the - Australian Privacy Principles (APPs) and this policy.

Sensitive information is subject to greater restrictions

Some personal information we hold is 'sensitive'. Sensitive information relates to a person's racial or ethnic origin, membership of political bodies, religions or trade unions, sexual preferences or activities, criminal record, state of health and medical history. The way we use tax file numbers and information received from a credit reporting agency about an individual is also restricted by law.

Sensitive information is usually needed for applications for death, sickness and disability insurance and to manage claims on those products. It may also be relevant to credit and other applications. We will not collect sensitive information about you unless you have consented to the collection of this information. It is TFSA policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the client agrees otherwise or the use or disclosure of this information is required or authorised by or under an Australian law or a court/tribunal order, and/or if the information is necessary in the establishment or defence of a legal claim. Documents asking for sensitive information will explain this.

Management of personal information

TFSA requires its employees and financial planners who handle personal information to respect the confidentiality of client information and the privacy of individuals. TFSA regards breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

How do we store personal information?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

How do we keep personal information accurate and up-to-date?

TFSA endeavours to ensure that the personal information it holds is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. We can generally update your information over the telephone or upon receipt of a written request.

Your right to request what personal information about you is held by us

You have the right to check what personal information about you is held by us under the Privacy Act, you have the right to obtain a copy of any personal information which TFSA holds about you and to advise TFSA of any perceived inaccuracy. The Act does set out some exceptions to this. To make a request, you will need to complete an application form verifying your identity and specifying what information you require. We will acknowledge your request within 14 days and respond promptly to it. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required. We will endeavour to ensure the information we have is accurate, however should you find it is incorrect, you may seek the correction of it and we will ensure it is corrected as soon as possible.

Anonymity and Pseudonymity

When you contact us, you have the option to remain anonymous. You may even use a pseudonym where it is lawful and practical to do so. In some cases, it may be impracticable for us to deal with you if you have not identified yourself, or if you have used a pseudonym.

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What if you have a privacy complaint?

If you consider that any action of TFSA breaches this Privacy Policy or the Australian Privacy Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly.

To make a complaint, please call us initially on 02 8297 1600. We may then get you to make a formal complaint in writing. If you are not satisfied with our response to your complaint, you can telephone the Australian Information Commissioner's office on 1300 363 992, or if calling from outside Australia, +61 2 9284 9749.

To make a complaint, please forward it in writing to the address below and allow 30 days for a response.

The Privacy Officer
Total Financial Solutions Australia Limited
PO Box R986 Royal Exchange NSW 1225

How to contact us

If you want to:

- make a general enquiry about TFSA's privacy policy
- change your personal information
- obtain an application form for access to your personal information

Please call us on 02 8297 1600

Or write to us at:
Total Financial Solutions Australia Limited
PO Box R986
Royal Exchange NSW 1225

Complaints

What should you do if you have a complaint?

If you have any complaint about the financial services provided to you, we will try to resolve your complaint quickly and fairly. You should take the following steps to enable us to do so:

1. Contact your Adviser and provide details of your complaint.
2. If your complaint is not satisfactorily resolved with your adviser within five business days, you may contact TFSA's Complaints Manager using the contact details on the front cover of Part One of this FSG.
3. If we are unable to resolve your complaint to your satisfaction within 45 days, you have the right to refer the matter to the Financial Ombudsman Service Limited (FOS), an independent external dispute resolution scheme of which TFSA is a member. FOS's services are available to you free of charge.

The contact details for FOS are:
Financial Ombudsman Service Limited
GPO Box 3
Melbourne VIC 3001
Phone: 1300 780 808

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