



Financial Services Guide

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Licensee

Heritage Capital Group Pty Ltd
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This Financial Services Guide (FSG) is authorised for distribution by Heritage Capital Group Pty Ltd.

Lack of Independence Disclosure Notice:

We can't call ourselves independent. Here's why:

The law makes it very difficult for most advisers to say they are independent, unbiased or impartial, even if they are not in any way linked to a financial product provider (like a bank).

If, for example, an adviser gets paid a commission to help a client arrange some insurance they are automatically prohibited from calling themselves independent. Most advisers who receive those commissions charge their clients very little (if anything) for the advice or the help they provide putting a policy into place. From time-to-time we receive these commissions.

So, although we always put your interests before ours when giving advice we cannot (by law) call ourselves independent, unbiased or impartial.

Purpose of this FSG

This Financial Services Guide (FSG) will help you decide whether to use the services that we* offer. It contains information about:

- Who we are
- The services we offer and their cost
- Any conflicts of interest which may impact the services
- How we are remunerated
- How we deal with complaints if you are not satisfied with our services.
- Our Privacy Policy

* In this document 'we' refers to Heritage Capital Group, Hamish Blievers & Elizabeth Walmsley.

Heritage Capital Group

Heritage Capital Group (HCG) Pty Ltd holds an Australian Financial Services Licence. It is required to comply with the obligations of the Corporations Act and the conditions of its licence. This includes the need to have adequate compensation arrangements in place with a Professional Indemnity insurer for the financial services that its current and past representatives provide.

Authorised Representatives

Hamish Blievers

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Hamish & Elizabeth are directors of Heritage Capital Group and are both Responsible Managers of the Licence.

Anthony Iser

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Michael Randall

Authorised Representative
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Our services

We are authorised to provide personal advice and dealing services in the following areas:

- Superannuation and SMSF
- Retirement planning
- Portfolio Management
- Managed investments
- Securities
- Derivatives
- Margin lending facilities
- Personal risk insurance

The financial advice process

We recognise that the objectives and personal circumstances of each client are different.

Where we provide personal advice, we will listen to you to understand your objectives and circumstances. We will also ask questions to make sure we provide advice which is in your best interests.

When we first provide personal advice to you it will be explained thoroughly and documented in a Statement of Advice (SoA) which you can take away and read.

The SoA will explain the basis for our advice, the main risks associated with the advice, the cost to you of implementing the

advice, the benefits we receive and any conflicts of interest which may influence the advice.

For investment products, managed funds and personal risk insurance products, we will provide you with a Product Disclosure Statement. This contains information to help you understand the product being recommended.

At all times you are able to contact us and ask questions about our advice and the products we recommend.

You can provide instructions to us in writing, via phone or via email. In some cases, we may require you to provide signed instructions.

We may provide further advice to you to keep your plan up to date for changes in your circumstances, changes in the law and changes in the economy and products.

If we provide further advice it will typically be documented in a Record of Advice (RoA) which we retain on file. You can request a copy of the RoA document at any time up to 7 years after the advice is provided.

Fees

All fees are payable to Heritage Capital Group. In some instances, fees and commissions may first be received by third parties and then forwarded to Heritage Capital Group. Our fees will range from 0% to 2% depending on the funds invested.

Advice Preparation Fee

The Advice Preparation fee includes meeting with you, the time we take to determine our advice and the production of the SoA.

The Advice Preparation fee is based on the scope and complexity of advice provided to you. We will agree the fee with you before providing you with advice.



Advice Implementation Fee

If you decide to proceed with our advice, we may charge a fee for the time we spend assisting you with implementation. We will let you know what the fee will be in the SoA.

Ongoing Services Fees

Our ongoing service fees depend on the ongoing service that we provide to you. They may be a percentage of your portfolio value or an agreed fixed fee which is paid monthly. They may also be charged on each transaction (eg for share trades) or at an hourly rate.

The services and fees will be set out in the SoA or RoA that we provide to you.

Brokerage Fees

Brokerage may be charged when you buy or sell ASX or International Direct Equities. Brokerage is usually charged as a percentage of the value of trade. Your specific brokerage rate will be discussed and agreed before any trade is placed.

Commissions

We receive commissions and other benefits from some product providers. The commission or benefit will vary depending on the recommended product and will be documented in the SoA or RoA.

Insurance Commissions

Heritage Capital Group receives a one-off upfront commission when you take out an insurance policy we recommend.

We also receive a monthly commission payment for as long as you continue to hold the policy.

Investment Commissions

Heritage Capital Group may receive a monthly commission payment from some investment providers. This will be based on your account balance and will continue to be paid for as long as you hold the investment.

Placement Fees

Heritage Capital Group may receive one-off placement fees where you invest in some listed investments (eg bank issued hybrids and IPO's). These will be paid by the issuer of the investment and will typically be a set percentage of the investment amount.

Other Benefits

We may also receive other benefits from product providers such as training, meals and entertainment. Details of any benefits received above \$100 will be maintained on a register which is available to you on request.

Adviser Remuneration

Hamish Blievers & Elizabeth Walmsley are the owners of Heritage Capital Group and are remunerated through the profits that the practice makes.

Anthony Iser is a salaried employee of Heritage Capital Group.

Michael Randall (and associated companies) is a Corporate Authorised Representative of Heritage Capital Group. Michael is not an employee of HCG.

HCG provides business infrastructure that enable Corporate Authorised Representatives to provide advice under the HCG licence. HCG collects revenue on behalf of these Corporate Authorised Representatives, who receive 100% of their remuneration and pay HCG a fee for the service.

Referral Fees and Commissions

In some situations, we pay fees or commissions to external parties who have referred you to us. We will disclose the referral arrangements to you when we provide you with a SoA.



Conflicts of Interest

Hamish Bliervers, Elizabeth Walmsley & Michael Randall may recommend investments in shares that he/she or his/her associated parties may hold or may hold in the future. For shares outside the ASX 200, we will advise where a conflict of interest may exist and how the conflict will be managed.

Wholesale Clients

In some circumstances we may provide services to you as a wholesale client. We will seek your consent before providing services to you as a wholesale client.

Making a Complaint

We endeavour to provide you with the best advice and service at all times. If you are not satisfied with our services, then we encourage you to contact us. Please call us or put your complaint in writing to our office.

If you are not satisfied with our response you can refer it to the Australian Financial Complaints Authority. You can contact AFCA on 1800 931 678. This service is provided to you free of charge.

Your Privacy

We are committed to protecting your privacy. We have a Privacy Policy which sets out how we collect, hold, use and disclose your personal information. It also sets out how you can access the information we hold about you, how to have it corrected and how to complain where you are not satisfied with how we have handled your personal information.

Our Privacy Policy is available on request and on our website.

Compensation Arrangements

We maintain Professional Indemnity Insurance in accordance with ASIC Regulatory Guides 126 and 179 at all times.

Managed Discretionary Services

This part of the FSG – about MDA services – is prepared pursuant to ASIC Corporations (Managed Discretionary Account Services) Instrument 2016/968.

About our MDA Service:

1. Corporate Actions – we will take your instructions on these matters unless you delegate the discretion to us under our MDA Service agreement with you.
2. MDA Contract - to provide our services to you we will need you to execute an MDA Services contract with us.
3. Investment program – this forms part of the MDA Contract and is prepared in accordance with the requirements in Div 3 of Pt 7.7 and Div 2 of Pt 7.7A of the Corporations Act and will include information about:
 - the nature and scope of the discretions that you will be authorised and required to exercise;
 - any significant risks associated with the MDA contract;
 - the basis on which the MDA contract is considered to be suitable for the client; and will be reviewed at least every 13 months.
 - warnings that the MDA contract:
 - may not be suitable for the client if the client has provided limited or inaccurate information about their relevant circumstances; and
 - may cease to be suitable if the client's relevant circumstances change.
4. Our fees and Costs for providing our service will be detailed in the MDA Contract but the table below will assist you to understand how we charge for our MDA Services.



5. Outsourcing – we may outsource certain services we offer, e.g. portfolio administration, and transaction settlement. Our approach to the selection of our outsourced service providers involves taking into consideration financial stability, administration systems, provision of services, quality of data provided, cost of services and competitiveness in the market. We continually review to ensure that the outsourced arrangements which we put in place are delivered in accordance with our obligations to you.

Our material outsourcing arrangements are currently with:

HUB24 Pty Ltd which is a regulated platform and used for custodial and depository services. You will be required to open a HUB24 account and will be given a Product Disclosure Statement. Heritage Capital Group does not act as a custodian of your assets.

6. Significant risks you should be aware of – we will have authority to make transaction decisions without seeking your input unless you specify otherwise. Our objective at all times will be to ensure we match the portfolio to agreed strategic and (when required) tactical asset allocation targets. We will use technology to help us to track all this and there is a risk (albeit small) that a technological failure could negatively impact your portfolio – e.g. an outage when we need to move quickly to protect your position. We believe these are the main risks you face under an MDA service over and above the risks other investors must deal with. We believe the MDA service enables us to move quickly to best manage your position, an advantage over traditional “advice/accept/transact” arrangements.

7. Fees and other costs

The table below shows fees and other costs that you may be charged. These fees and costs may be deducted from your money, from the returns on your investment or from the assets held within the MDA service arrangement.

You should read all the information about fees and costs because it is important to understand their impact on your investment.



Fees Table

In relation to your portfolio, we manage for you we advise the following fees and costs will be incurred in the normal course of business. All fees are inclusive of GST The format of this disclosure has been mandated for all MDA operators by the Australian Securities & Investments Commission (ASIC).		
Type of fee or cost	Amount	How and when paid
Fees when your money moves in or out of the portfolio	n/a	n/a
<i>Establishment fee</i> The fee to open your portfolio	n/a	n/a
<i>Contribution fee</i> The fee amount contributed to your portfolio	n/a	n/a
<i>Withdrawal fee</i> The fee amount you take out of your portfolio	n/a	n/a
<i>Exit fee</i> The fee to close your portfolio	n/a	n/a
Management costs		
<i>The fees and costs for managing your portfolio</i>	Assets Under Management Rate* Up to \$2,000,000 1.38% \$2,000,001-\$5,000,000 1.10% \$5,000,000- \$10,000,000 0.94% \$10,000,000+ 0.83% *Min \$7,500 pa	Annual fee, debited monthly in arrears from your HUB24 Cash account.
Additional fees and costs for managing the investments in the MDA portion of your portfolio (if applicable)	Model Fee 0.025%	
Admin fees to HUB24 for MDA portion on a sliding scale (if applicable)	Non-Super \$0-\$250,000 0.28% \$250,000-\$500,000 0.14% \$500,001-\$1,000,000 0.12% \$1,000,001-\$2,000,000 0.04% \$2,000,000+ 0.00% Min \$350 Max \$2,050 Super / Pension \$0-\$250,000 0.32% \$250,000-\$500,000 0.16% \$500,001-\$1,000,000 0.14% \$1,000,001-\$2,000,000 0.04% \$2,000,000+ 0.00% Min \$350 Max \$2,300	Annual fee, debited monthly in arrears from your HUB24 Cash account.
Service fees		
<i>Switching fee</i> The fee for changing portfolio options	n/a	n/a