



COUNTERPOINT
ADVISORY SERVICES

FINANCIAL SERVICES GUIDE

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BKA Financial Pty Ltd, trading as, Counterpoint Advisory Services (WA) (001307528)
Australian Business No. 13 672 799 281

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Corporate authorised representative of
Symmetry Group Pty Ltd
Australian Business No. 46 159 449 368
Australian Financial Services License No. 426385

About this Guide

This FSG consists of two parts, and both contain important information which must be read together. 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.

INTRODUCTION

The purpose of this Financial Services Guide (FSG) is to provide you with important information before a financial service is provided to you, so you can make an informed decision about using our services. Please take the time to read it and keep it safely with your other documents.

This Financial Services Guide ('FSG') has been authorised for distribution by the authorising licensee, Symmetry Group Pty Ltd ABN 46 159 449 368, AFS Licence 426385. Symmetry Group is the financial services licensee that authorises **BKA Financial Pty Ltd, trading as, Counterpoint Advisory Services (WA) (001307528)** and your financial adviser ('Adviser') and their firm ('we', 'us', 'our') to provide financial services.

This FSG is divided into two parts and both parts must be read in conjunction as together they form the full FSG. Part One of this FSG provides high level disclosure of the financial services provided by us as well as important information about Archon Wealth Management's Licensee, Symmetry Group, whereas Part Two of this FSG is an Adviser Profile and more specifically outlines the financial services provided and products recommended by us.

The Licensee and your Adviser

When you engage with a financial adviser in Australia, to provide financial advice they need to either hold their own Australian Financial Services Licence (AFSL) or be authorised to provide advice through a licensee.

Part One of this FSG contains information about:

- Symmetry Group, as the holder of the Australian financial services licence that authorises us to provide financial services.
- Lack of Independence disclosure statement.
- Relationships or associations with other entities, that could create potential conflicts of interest.
- Other disclosure documents you may receive.
- The financial services and types of products we provide or recommend.
- Collecting your personal information and providing us with instructions.
- Fees or costs that may apply to you.
- Remuneration that we, your Adviser or a related entity may receive; and
- What you can do if you are not happy with our services or have a complaint.

Lack of Independence

Symmetry Group and its authorised representatives (Advisers) are not independent, impartial or unbiased because we receive insurance commissions for the advice we provide on life risk insurance products.

Who Is Symmetry Group Pty Ltd?

Symmetry Group holds an Australian Financial Services Licence No. 426385 (AFSL) issued by the Australian Securities and Investment Commission (ASIC). Symmetry Group conducts business through its financial advisers who are appointed as Authorised Representatives under Symmetry Group's AFSL.

Symmetry Group is responsible for the advice and conduct of your financial adviser. Symmetry Group are not responsible for any unauthorised services that they may offer (to the full extent permitted by law), so please check the services your adviser offers in FSG Part Two. The Licensee provides a range of services and support to its advisers such as technical, software, educational and administrative resources to assist them in providing you advice.

Our financial services

The Licensee is licenced under the *Corporations Act 2001* (Cth) to provide financial product advice and to deal in a range of financial products within the following classes of financial products:

- Life Insurance (Risk and Investment Products).
- Retirement Savings Accounts and Superannuation
- Government Debentures, Stocks and Bonds
- Deposit Products
- Managed Investment Schemes including investor directed portfolio services
- Securities
- Self-Managed Superannuation 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, Lonsec, Zenith, SQM and Morningstar. Your Adviser is only authorised to advise on products which are approved by Symmetry Group 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.

If your adviser is authorised by Symmetry Group to provide Tax(Financial) Advice, based on the information collected from you, your Adviser will consider the tax consequences that relate directly to the financial advice being provided. However, this financial advice will not include an assessment of your overall tax position. To determine how your Adviser's financial advice fits with your overall tax position, you should seek separate tax advice about liabilities, obligations or claim entitlements that arise, or could arise, under a taxation law.

Your adviser

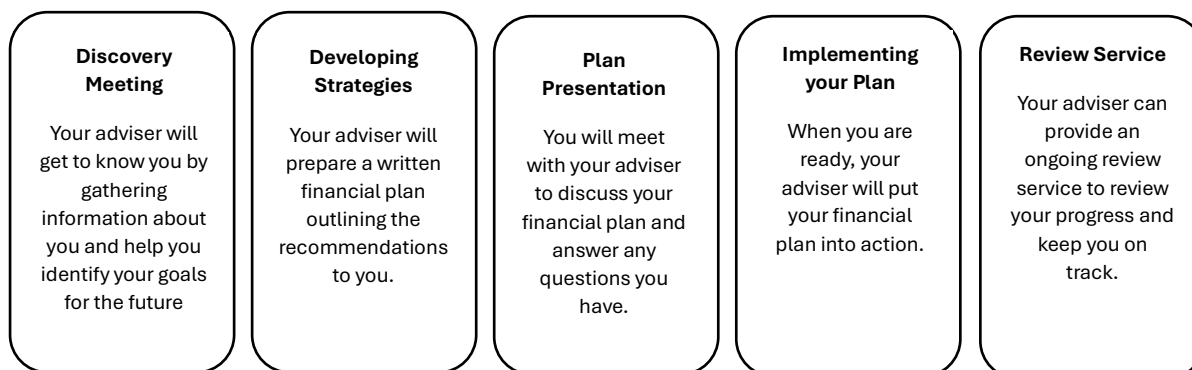
Your financial adviser will be the Authorised Representative listed in Part Two of this FSG. This FSG must be read in conjunction with the Authorised Representative Profile as it forms part of this FSG.

Authorised Representative Profile – Part Two

It provides detailed information about your financial adviser such as their contact details, referral sources how they are remunerated and the types of financial products and services they are authorised to advise/deal in. It will also contain details of their Authorised Representative number to enable you to find out details about them from the MoneySmart Financial Adviser Register. Please retain both Part One and Part Two of the FSG for your reference and any future dealings with Symmetry Group and your financial adviser.

OUR ADVICE PROCESS

A comprehensive advice process is designed to ensure that the advice provided is suited to your needs and financial circumstances.



Important Documents

You will receive a number of documents throughout the advice process and if you agree to enter into an ongoing review service. We will provide these documents as per your preferred method, electronically or paper based.

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| Statement of Advice (SOA) | 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. |
| Record of Advice (ROA) | 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. |
| Execution Only Document (Non-Advice Transactions) | 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 (depending on type) and arrange for the transaction to be completed, without providing personal advice. We will provide you with an Execution Only Document, which confirms your instructions, informs you that no advice has been provided and discloses any fees and charges payable by you. Any assistance we provide to complete your transaction should not be taken as a recommendation or endorsement of the product or transaction. |

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| Product Disclosure Statement (PDS) | 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 PDS 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. |
| Ongoing Service Agreement (OSA) | If your Adviser recommends, and you enter into an ongoing review service, for a period of more than 12 months, you will initially receive an Ongoing Service Agreement (OSA). Your written consent will be sought, annually, to continue these fees by way of a fee consent form. This document outlines information about the services you will be entitled to receive under the arrangement during that period and provides your consent to the deduction of any ongoing fees. |
| Fixed Term Agreement | If your Adviser recommends, and you enter into a service arrangement for a fixed period of 12 months or less, you will receive a Fixed Term Agreement. This document outlines the agreed service, and the fees applied over the specified period. |

Instructing your Adviser

You will generally need to instruct your Adviser verbally or in writing. In some instances, we may also require your written instructions to be verified verbally or ask you to sign documents electronically. For some products and services though, you may specify how you would like to give us instructions, for example; by phone, mail, or e-mail.

What Information Should You Provide to Receive Personal Advice?

Your adviser must act in your “Best Interests”. To assist your adviser in acting in your best interests, as well as helping us to advise you in an appropriate manner and protecting you throughout our relationship, we request you:

- Supply accurate information about your personal circumstances, needs and objectives.
- Update your adviser on any changes to this information.
- Do not make any payments for investments, contracts, or fees “made payable” to your adviser.
- Never sign blank forms.
- Never sign any form or agree to any recommendation without fully understanding what you are signing or agreeing to.

You have the right to withhold personal information, but this may have an impact on the appropriateness of the advice you receive. You should read any warnings contained in any advice document (whether SoA or RoA) carefully before making any decision relating to a recommended financial strategy and/or product. Your adviser will request you sign an acknowledgement if you do not wish to provide complete information or if they believe that the information is not accurate.

In addition, as a financial service provider, we have an obligation under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) to verify your identity and the source of funds and wealth. This means that we will ask you to present identification documents such as passports and driver’s licence. We will also retain copies of this information. We assure you that this information will be held securely. We cannot provide you with services if you are unwilling to provide this information.

How We Handle Your Personal Information

Symmetry Group and its Authorised Representatives (your Adviser) are committed to ensuring the privacy and security of your personal information. As part of our continuing commitment to client service and maintenance of client confidentiality Symmetry Group has adopted the principles set out in the Privacy Act 1988. For further details you can refer to Symmetry Group's Privacy Policy located *here* or visit www.symmetrygroup.com.au

HOW YOU PAY FOR SYMMETRY GROUP ADVICE AND SERVICES

All advice fees and commissions are required to be paid directly to Symmetry Group as the licensee. Symmetry Group retains a set monthly fee for the services it provides to us, and the balance is passed on to us. If the fees, commissions, or benefits are not calculable at the time we provide personal advice, we will describe the manner in which they are calculated at the time the advice is given or as soon as practicable after.

Financial Advice Fees

Fees are charged for the provision of advice and/or implementation of recommendations. Fees may be a Fixed Rate Fee, Percentage Rate Based, Hourly Rate Fee, or a combination of both depending on the complexity of your personal situation and the time and effort in the work done for you. The fees will be discussed and agreed with you prior to services being provided. If advice is provided the fees will be disclosed in your Statement of Advice (SoA) and/or Record of Advice (ROA).

Ongoing and Fixed Term Fee arrangements may be based on a Flat Fee or an Asset Scale Fee (percentage rate based on the value of your investment portfolio). These will be outlined in FSG Part 2.

Retail Insurance Product Commissions

Symmetry Group may receive initial and ongoing commissions on behalf of your adviser by retail insurance product issuers where you acquire any of the retail insurance products via our services.

Where the commission in the first year is greater than that payable in later years, the maximum upfront (year 1) commission is 66% (inclusive of GST) and the maximum ongoing (years 2+) commission is 22% (inclusive of GST). For example, for an insurance premium of \$1,000, the commission is up to \$660 upfront and up to \$220 each year thereafter.

Where upfront and ongoing commissions are the same, there is no legislated maximum however product providers generally pay up to 33%.

Where the insurance product(s) was purchased prior to 1 January 2020, we may continue to be paid commissions in the same manner as what would have previously been advised to you at the time of obtaining the product(s).

Goods and Services Tax (GST)

All financial payments, commissions and fees are subject to GST.

Other Benefits We May Receive

Some product providers may give Symmetry or your Adviser other benefits such as entertainment or sponsorship where the amount is less than \$300, or the benefit has genuine education or training purposes relevant to providing financial advice. Any benefit that is material to our advice, will be disclosed in the SOA. Both Symmetry and your Adviser maintain a Register to document any benefits received. You have the right to request for further information in relation to the remuneration, the range of amounts or rates of remuneration, and other benefits received by Symmetry and/or your Adviser.

COMPLAINTS, PROFESSIONAL INDEMNITY AND COMPENSATION ARRANGEMENTS

We always strive to provide quality advice and service and welcome any feedback that allows us to continue to improve our services.

What should you do if you are not satisfied with our services?

If you have any complaints about the services provided, please take the following steps:

Step 1: Contact your Adviser and tell them about your complaint.

We are committed to resolving your concerns. If you are not fully satisfied with any part of the service or advice for whatever reason, you should take the following steps:

Step 2: Contact the General Manager

If your complaint is not satisfactorily resolved within 5 working days, please contact Mr Mark Lockwood at Symmetry Group by

- ☎ (08) 6380 1400, or put your complaint in writing and send it to us at
- ✉ PO Box 1526 Subiaco WA 6904, or
- ✉ via email at mark@symmetrygroup.com.au

Symmetry Group will undertake all effort to resolve your complaint quickly and fairly and we will provide a response to your complaint within 30 calendar days

Step 3: Australian Financial Complaints Authority (AFCA)

If you are not satisfied with our handling of your complaint or our decision, you may refer your complaint to the Australian Financial Complaints Authority (AFCA). The AFCA offers a free independent dispute resolution service for consumer and small business complaints.

- ☎ 1800 931 678 (free call)
- ✉ Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
- ✉ info@afca.org.au
- 🌐 www.afca.org.au

Information about your rights can also be obtained from the Australian Securities and Investments Commission on 1300 300 630.

Please note, Symmetry Group is a member of this Service. Please see our Complaints Policy available on our website for further details.

Compensation Arrangements

Symmetry Group has professional indemnity insurance cover in place will ensure it continues to maintain Professional Indemnity insurance in accordance with s.912B of the Corporations Act 2001 (as amended). Our professional indemnity insurance is subject to terms and exclusions and generally covers claims arising from the actions of our current and former employees or authorised representatives (your Adviser) whilst they acted on our behalf.

PART 2 - Adviser Profile

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Financial Services are provided to you by:

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| Corporate Authorised Representative Name | BKA Financial Pty Ltd |
| Trading Name | Counterpoint Advisory Services (WA) |
| Australian Business Number | 13 672 799 281 |
| Corporate Authorised Representative ASIC Number | 001307528 |
| Authorised Representative Name | Benjamin Armstrong |
| Authorised Representative ASIC Number | 000381115 |
| Business Address | 309 Hay Street, Subiaco WA 6008 |
| Postal Address | PO Box 167, Mount Hawthorn WA 6915 |
| Telephone | (08) 9468 1688 or 0466 721 162 |
| Email | ben.armstrong@counterpointas.com.au |
| Webpage | www.counterpointas.com.au |

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|---------------------------------|--|
| Benjamin (Ben) Armstrong | <p>Ben is an Authorised Representative of BKA Financial Pty Ltd, trading as, Counterpoint Advisory Services (WA) and is authorised to advise and deal in the following products:</p> <ul style="list-style-type: none">• Life Insurance (Risk and Investment Products).• Retirement Savings Accounts and Superannuation• Government Debentures, Stocks and Bonds• Deposit Products• Managed Investment Schemes including investor directed portfolio services• Securities• Self-Managed Superannuation Funds |
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WHAT ARE THE COSTS?

Symmetry receives all remuneration paid upon the provision of services by **Benjamin Armstrong** and under contract deducts a Licensee fee from the amounts received. All remuneration received by **BKA Financial Pty Ltd, trading as, Counterpoint Advisory Services (WA)**, is then paid to **Benjamin Armstrong** and/or their associated entities. Fees will be charged by one or a combination of methods as outlined below.

You will be provided with an estimate of all applicable fees/costs once your needs and requirements have been understood and agreed. All fees are quoted inclusive of GST. These fees include:

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| Advice Preparation Fees (Initial Advice) | <p>We charge fixed price fees for the preparation of your advice (initial advice fee) which may range between \$2,200 to \$22,000.</p> <p>If there are any other fees/charges these will also be identified and agreed with you prior to commencement of work. We reserve the right to reduce or waive an initial advice fee at our sole discretion.</p> |
| Advice Implementation Fees | <p>We may charge fixed price fees for the implementation of your advice which may range between \$1,650 and \$11,000, or a percentage-based fee ranging from 0.00% to 1.65%.</p> |
| Ongoing Professional Advice Service | <p>We charge fixed price fees for our ongoing professional advice services which may range between \$3,000 and \$110,000, or a percentage-based fee ranging from 0.00% to 1.10%.</p> |
| Life Insurance Commission | <p>Commissions may be paid from insurers to the AFSL, Symmetry, and are at no additional cost to you. Insurers may pay the AFSL, Symmetry, commission in association with the placement of life insurance policies.</p> <p>Generally, the initial commission will be paid at the time you obtain the insurance product with ongoing commissions paid during the life of the insurance product. Initial commission may be between 0% and 66% of the initial annual premium.</p> <p>Ongoing commission may be between 0% and 22% of the ongoing annual premium.</p> <p>For example, for an insurance product with an annual premium of \$2,000, where the insurer pays an upfront commission of 66%, we will receive \$1,320. If the insurer pays 22% of the annual premium as ongoing commission for as long as you hold the product, on an annual premium of \$2,000, we will receive \$440 per annum.</p> <p>Should you cancel an insurance contract within the first two years the Adviser reserves the right to invoice you an amount equal to the costs they have incurred as a result of the provision of financial services to you.</p> |
| Other Fees | <p>We may charge an hourly rate for the advice and/or the administrative services we provide in the range of \$110 and \$330 per hour.</p> |

Method of payment

You may elect to be invoiced directly for these fees to be paid to Symmetry Group or you may elect to have these fees deducted from your financial product(s). An estimated cost of services will be provided to you before commencing any work.

Note, all fees deducted from financial product providers will require fee consent forms.

REFERRAL ARRANGEMENTS

Ben may have referral arrangements with selected referral partners. If a referral arrangement applies to you, Ben will provide you with further details on the benefits received.