



Sterling & Freeman Advisory Pty Ltd
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Australian Financial Services Licence No: 479381

Financial Services Guide (FSG)

Introduction

The financial services we refer to in this guide are offered on behalf of Sterling and Freeman Advisory Pty (S&F) and its representatives, collectively referred to as “us, we or our”. It is a public company whose directors, management and staff bring a diverse, experienced and complementary skill set to their role as Responsible Entity.

This Financial Services Guide (FSG) is designed to clarify who we are and what we do, and help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we are able to offer you;
- how we and our associates are paid and any other benefits we may receive;
- any potential conflicts of interest we may have;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it is full of useful information – and is also worth holding on to for future reference. And of course, if you ever have any questions, please contact us (please refer to the ‘Contact details’ section at the end of this FSG for details).

What else will you receive?

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances, it is not a requirement that you be given a PDS (including, for example, where you already have one).

Who is responsible for the financial services we provide?

Sterling & Freeman Advisory Pty Limited is an Australian Financial Services Licensee and is responsible for the financial services provided including the distribution of this FSG.

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How can you provide us instructions?

You can give us instructions by using the contact details set out in this FSG. Generally, you need to give us instructions in writing (e.g., fax, e-mail or letter) or another method as agreed by us.

GENERAL ADVICE NOTIFICATION

This information is provided under the general advice provisions of ASIC (RG 244.38) and the Corporations Act (s949A(3)).

The advice may be provided by Sterling & Freeman Advisory Pty Ltd (S&F).

We are legally obliged to warn all clients that:

(a) the advice has been prepared without taking account of the client's objectives, financial situation or needs; and

(b) because of that, the client should, before acting on the advice, consider the appropriateness of the advice, having regard to the client's objectives, financial situation and needs; and

(c) obtain an Information Memorandum or Product Disclosure Statement relating to the product and consider the Statement before making any decision about whether to acquire the product.

S&F has taken all reasonable steps to ensure that all authorised representatives comply with these disclosure requirements, which are specifically referenced in the business procedures manual as well as ongoing training.

Aims & Mission Statement

- Sterling & Freeman's mission statement is to deliver trusted financial solutions and build business relationships with integrity.
- Sterling & Freeman aims to have and develop systems of governance that are predictable and measurable.
- Sterling & Freeman aims to have and develop responses that are efficient, honest and fair.
- Sterling & Freeman will aim to use its Compliance, Risk, Anti-Money Laundering, and full operating procedures, to make up its basis in its day-to-day operation.

PRIVACY POLICY

This Privacy Policy applies to the services offered on the Sterling & Freeman web site. Please read this Privacy Policy carefully before using this web site. Usage of the Sterling & Freeman web site is conditional upon you agreeing to be bound by this privacy policy.

In summary, while you should read each provision in this Privacy Policy, you must note that by using the Sterling & Freeman web site you agree that if you submit your personal information to us, we may create a database record about you.

1. Your personal information is important to us.

Sterling & Freeman is committed to safeguarding your personal privacy. We recognise that you have a right to control how your personal information is collected and used. We know that providing personal information is an act of trust and we take that seriously.

Unless you directly give us consent to do otherwise, Sterling & Freeman will only collect and use your personal information provided using this web site as set out below.

2. Collecting information about you.

Sterling & Freeman will not collect or monitor any personal information about you without your consent. The only personal information we collect when you use this web site is what you tell us about yourself.

3. Using and disclosing your personal information.

Sterling & Freeman recognises the trust you place in us when you give us personal information, we will not use or disclose any information about you provided using this web site for other purposes without your consent, except for in exceptional cases such as if disclosure is required by laws or is necessary to protect the rights or property of Sterling & Freeman, or any member of the public, or to lessen a serious threat to a person's health or safety.

4. Storage and security of your personal information.

Sterling & Freeman will endeavour to take all reasonable steps to keep secure any information, which we hold about you, and to keep this information accurate and up to date. Your information is stored on secure servers that are protected in controlled facilities. Our employees are obliged to respect the confidentiality of any personal information held by Sterling & Freeman.

Sterling & Freeman may exchange your personal information with third party service providers engaged to assist with services including administration, audit, tax, contact management and other potential queries. The third parties to whom we disclose personal information may be located in other countries however we take steps to ensure that our service providers are obliged to protect the privacy and security of your personal information and use it only for the purpose for which it is disclosed.

However, as we cannot guarantee the security of communications over the Internet, we cannot give an absolute assurance that your information will be secure at all times. Sterling & Freeman will not be held responsible for events arising from unauthorised access to your personal information.

5. Procedures for access, correction and feedback

If you wish to access or correct any personal information, we hold about you or have any feedback or concerns about privacy, please email us at info@sterlingandfreeman.com Where you seek a response from us, we will let you know who will be handling your matter and when you can expect a full response.

In the case of access and correction requests, please provide as much detail as you can about the particular information you seek, in order to help us retrieve it. Under the Privacy Act and other relevant laws, we are required to provide our reasons if we refuse your request. Where we decide not to make a requested correction and you disagree, you may ask us to make a note of your requested correction with the information.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au

ENQUIRIES & COMPLAINTS

What to do if you have a problem or question.

If Sterling & Freeman becomes aware of any ongoing concerns or problems, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our Privacy Policy, or you have a problem or complaint, please contact us by email, or call us on (613) 9607 8268.

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly. If you are unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let our Representative know so we can act on it immediately.
2. If our Representative has not satisfactorily resolved your complaint, please contact our Complaints Manager on:
Phone: (613) 9607 8268
Email: info@sterlingandfreeman.com

In writing to:
Sterling & Freeman Complaints Manager
Level 40, 140 William Street
Melbourne VIC 3000

3. If your complaint is not resolved within 45 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA), an independent complaints handling body.

We are a member of AFCA. AFCA provides a free, accessible, fair and independent dispute resolution service to consumers. You can contact AFCA on:

Phone: 1800 931 678
Email: info@afca.org.au
Website: www.afca.org.au

Sterling & Freeman holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act. This insurance also covers the conduct of our advisers who were authorised by S&F at the time of providing the advice, but are no longer representatives at the time of your complaint.

