

FINANCIAL SERVICES GUIDE

**This Financial Services Guide was prepared on 01/04/2025 and its distribution is authorised by
TWTG Financial Services Pty Ltd Australian Financial Services Licence Number 562929**

FINANCIAL SERVICES GUIDE

NOT INDEPENDENT

We are not permitted to use the term independent, impartial, unbiased or like terms as we receive commissions for any life risk insurance products we recommend that are implemented on your behalf.

You have the right to ask us about our charges, the type of advice we will provide you, and what you can do if you have a complaint about our services.

This Financial Services Guide (“FSG”) is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with a financial service. The matters covered by the FSG include who we are, how we can be contacted, what services we are authorised to provide to you, how we (and any other relevant parties) are remunerated, details of any potential conflicts of interest, and details of our internal and external dispute resolution procedures, along with how you can access them.

It is intended that this FSG should assist you in determining whether to use any of the services described in this document.

You should also be aware that you are entitled to receive a Statement of Advice when we first provide you with personal advice, (advice that takes into account your objectives, financial situation and needs). The Statement of Advice will contain the advice, the basis on which it is given and information about fees, commissions and associations which may have influenced the provision of the advice.

If our representative provides further advice to you and your personal circumstances have not significantly changed, and that further advice is related to the advice we provided to you in a previous Statement of Advice and we do not give that further advice to you in writing you may request a copy of the record of that further advice at any time up to 7 years from the date our representative gave the further advice to you.

You can request the record of the advice by contacting the representative or us in writing or by telephone or by email.

In the event we make a recommendation to acquire a particular financial product (other than securities), we must also provide you with a Product Disclosure Statement (‘PDS’) containing information about the particular product, which will enable you to make an informed decision in relation to the acquisition of that product. Where we recommend a ‘Platform’ or ‘Wrap Account’ or ‘Masterfund’ you will be given a PDS for that product and, in addition, you will be given what is referred to as a ‘Short Form PDS’ which provides information about the particular managed funds we have recommended.

Who will be providing the financial service to me?

Licensee: TWTG Financial Services Pty Ltd

ABN: 93 678 967 407

Australian Financial Services Licence Number: 562929

Office Address: Suite 4A, Level 4 34 MacMahon St Hurstville NSW 2220

Postal Address: PO Box 836 Hurstville BC NSW 1481

Phone: 02 9570 1111

Email: twtg1@waytogo.com.au

Who is my adviser?

The Corporate Authorised Representative (CAR) is:	Name	Sunluck Financial Pty Limited
	ABN	17 636 714 139
	CAR Number	1284754

The Authorised Representative is:	Jenkin Wang as Director of Sunluck Financial Pty Limited and as Authorised Representative no.250525
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About Jenkin Wang

Authorised representative number	250525
Qualification	Diploma of Financial Planning
Professional memberships	Certified Financial Planner (CFP), CFP Member of FAAA
Experience	<p>Accredited adviser for AXA Australia (National Mutual) since 1989, awarded the International Quality Award in 1992. Served as an authorised representative of National Mutual Assets Management (later National Mutual Financial Planning) from 1991 to 1995, followed by Personal Investment Planners from 1996 to 1999.</p> <p>From September 2000 to June 2012, held the role of authorised representative at AXA Financial Planning, transitioning to Charter Financial Planning from July 2012 to 2020.</p>

From December 2020 to March 2025, served as an authorised representative and financial adviser (250525) under LFG Financial Services (AFSL 227096).

Since April 2025, an authorised representative of TWTG Financial Services.

What kinds of financial services are you authorised to provide me and what kinds of products do those services relate to?

TWTG can offer you the following services:

- Savings, investment and wealth creation strategies
- Superannuation and retirement planning strategies
- Personal insurance
- Estate planning
- Age care planning
- Budget, cash flow, and debt management
- Salary packaging and tax strategies for investments, superannuation and insurance
- Centrelink and government benefits

To enable TWTG to provide those services it holds an AFSL for providing advice on, and deal in, the following financial products:

- Deposit and payment products (basic & non-basic)
- Government Debentures, Stocks & Bonds;
- Investment Life Insurance Products.
- Life Insurance Risk Products;
- Managed investment Schemes (IDPS);
- Securities;
- Retirement Savings Account Products; and
- Superannuation & SMSF;

Please note that Jenkin Wang is a qualified tax relevant provider, and so it is appropriate for him to show tax calculations in a Statement of Advice.

We can advise you in respect of direct Securities however we cannot provide a service to buy and sell Securities. We are able to refer you to a stockbroker who will arrange for your order to buy or sell Securities to be placed. We will assist you in facilitating the buying and selling of Securities as your adviser.

PORTFOLIO MONITORING:

Internal databases are maintained detailing clients' investments recommended by TWTG. This does not constitute portfolio monitoring. Portfolio reviews are conducted at a frequency agreed upon in the ongoing service agreement.

Who do you act for when you provide financial services for me?

We act for you and the TWTG is responsible for the financial services provided to you.

How will I pay for the service?

TWTG offers flexibility to you for payment of the services it provides. You will pay a fee to us for any investment and superannuation advice. For Life Insurance risk product we are entitled to receive a commission from the Insurer if you implement our recommendations.

As the licensee, TWTG receives all fees and commissions paid upon the provision of services by your adviser and under contract deducts a Licensee fee from the amounts received. TWTG then forwards the residual onto your adviser's practice who will then meet the costs of operating their business, which may include payment of a salary, bonus and/or distributions to your adviser.

What are the fees and commissions TWTG receives?

FEES PAID BY YOU

TWTG charges a fee for the services we provide. Before offering personal advice, your adviser will discuss and agree on both the fee and payment options with you. These fees are based on your individual circumstances, the complexity of your situation, and the time required to prepare your advice. All remuneration and associated benefits will be disclosed in the written advice provided to you. We generally charge a fixed fee for initial advice and its implementation, typically from \$3,300 to \$7,500 and could be up to \$15,000, though it may be higher depending on complexity. This fee will be specifically quoted and agreed upon in advance.

We offer annual service packages on either a 12-month or ongoing basis. Fees generally range from 0.55% to 1.1% of Fund Under Advice (FUA) per annum, determined by the level of service and complexity of your financial situation. The ongoing service agreement, including service levels and fees, will be discussed and agreed upon during the advice process. This agreement is reviewed annually and can be cancelled at any time during the year.

Fees can usually be paid by invoice, direct debit, deducted from a financial product, or a combination of two or more of these methods.

COMMISSIONS

Insurance products

The issuers of life insurance products pay TWTG an initial commission. The maximum upfront commission that can be paid is 66% of the initial annual premium.

AND

The issuers of life insurance products pay TWTG an ongoing commission. This commission is a maximum of 22% of the renewal premium. This commission is paid to the licensee for as long as you hold the product.

For example, if your first year's premium was \$500 and the initial commission was 66% TWTG will receive \$330. If your premium for the second and subsequent years was \$500, and the ongoing commission was 22% TWTG will receive \$110 per annum.

Commissions are generally paid by the product issuer as premiums are received.

Stockbroking

We generally do not charge a fee when placing your instructions to buy or sell shares where your investments were already in an online platform. However, if you request our assistances to buy or sell a stock outside a platform through a stockbroker then a fixed service fee up to \$550 may apply for each stock to cover the time and administrative effort involved.

Hourly Rate

When TWTG provide one-off services, that is no ongoing arrangement, we may charge you an hourly rate of up to \$550 for the services we are delivering to you.

Do any relationships or associations exist which might influence you in providing me with the financial services?

Neither TWTG, its representatives nor any related companies have any association with any product issuer that could be expected to influence us in the provision of the financial services.

Will you provide me with advice, which is suitable to my needs and financial circumstances?

Yes. But to do so we need to find out your individual objectives, financial situation and needs before we recommend any financial products or services to you.

You have the right not to divulge this information to us, if you do not wish to do so.

In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully.

What should I know about the risks of the financial products or strategies you recommend to me?

We will explain to you any significant risks of financial products and strategies which we recommend to you. If we do not do so, you should ask us to explain those risks to you.

What information do you maintain in my file and can I examine my file?

We maintain a record of your personal profile, which includes details of your objectives, financial situation and needs.

We also maintain records of any recommendations made to you.

We are committed to implementing and promoting a privacy policy which will ensure the privacy and security of your personal information. A copy of our privacy policy is enclosed for your information.

If you wish to examine your file, we ask that you make a request in writing and allow up to fourteen (14) working days for the information to be forwarded.

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 of the likely cost in advance and can help to refine your request if required.

Can I provide you with instructions and tell you how I wish to instruct you to buy or sell my financial products?

Yes. You may specify how you would like to give us instructions, for example by telephone, email, or other means.

Who can I complain to if I have a complaint about the provision of the financial services to me?

TWTG has in place Professional Indemnity Insurance that is required by the Corporations Act and which meets ASIC's requirements and covers present and past representatives for the services provided whilst they were authorised by TWTG.

If you have any complaint about the service provided to you, you may contact us by telephone or, in person by making an appointment or by email or normal mail. All the necessary contact details are shown on page 3 of this FSG. We will treat your complaint fairly and take steps in an attempt to resolve the complaint justly and amicably.

We will acknowledge your complaint promptly and will make a decision as quickly as possible. If we have not resolved the complaint within 30 days or you are not satisfied with the result you are able to escalate your complaint to the Australian Financial Complaints Authority of which TWTG is a member.

You may submit the complaint to the Australian Financial Complaints Authority online through its website www.afca.org.au. Alternatively, here are the other methods of contact which are:

Phone: 1800 931 678
Email: info@afca.org.au
Mail to: GPO Box 3, Melbourne Victoria 3001.
Fax: (03) 9613 6399

All handling of complaints by us and by the Australian Financial Complaints Authority is at no cost to you.

PRIVACY STATEMENT

The privacy of your personal information is important to us.

1. **Your representative will ask you many questions. Why is so much information required?**

We collect your personal information to enable us to provide you with the products and services that are appropriate to your needs. Under the following Australian laws we may be authorised or required to collect your personal information:

- Corporations Act 2001,
- Australian Securities and Investment Commissions Act 2001,
- Anti Money Laundering and Counter Terrorism Financing Act,
- Taxation Administration Act 1953,
- Superannuation Guarantee (Administration) Act 1992 and
- Superannuation (Unclaimed Money and lost members) Act 1999

as those acts are amended and any associated regulations. From time to time other acts may require, or authorise us to collect your personal information.

We are required to collect sufficient information to identify a person's needs, objectives and financial circumstances so that we can provide appropriate financial advice.

We will gather the information by asking you numerous questions about you and possibly your family. We will record this information. We endeavour to retain accurate, complete and up to date personal information about you so we will ask you to review the information from time to time.

If the information you provide to us is incomplete or inaccurate this will impact on our analysis of your requirements and may result in advice that is not appropriate to your needs and circumstances. If this does occur you will need to make your own assessment concerning the appropriateness of our advice.

At times, we may collect personal information from someone other than yourself and you may not be aware that we collect or have collected this information.

2. **Access and correction**

You may (subject to permitted exceptions) access and update your information by contacting us. You may access the personal information we retain and request corrections. This right of access is subject to some exceptions allowed by law. We will give you reasons if we deny access though will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependent to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

3. Providing personal information

We may provide personal information to:

- organisations (who are bound by strict confidentiality) to whom we outsource certain functions such as our auditors. In these circumstances, information will only be used for that purposes;
- other professionals such as solicitors, accountants and stockbrokers when a referral is required;
- entities based overseas (see below for details);
- third parties when required to do so by law, e.g. legislation or Court Order.

4. Overseas disclosure

Sometimes we need to provide personal information to or get personal information about you from persons located overseas. For example we may outsource a function involved in the financial planning business to someone based overseas. Nevertheless, we will always disclose and collect your personal information in accordance with Privacy Principles.

5. Identifiers

Although in certain circumstances we are required to collect government identifies such as tax file numbers, 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.

6. Dealing with us anonymously or using a pseudonym

The nature of the provision financial services does not lend itself to treating customers with anonymity. All transactions require personal information about the individual for whom the transaction is being completed. However, in some instances we may be able to provide information or a service anonymously or to you under a pseudonym, for example, enquiries about products from a potential client.

You can deal with us anonymously where it is lawful and practicable to do so.

7. Marketing Practices

Every now and then we might let you know, via mail, SMS, telephone or online, about news, products and services that you might be interested in. We will engage in marketing unless you tell us otherwise. At any time, you can contact us to update your marketing preferences.

8. Sensitive Information

Without your consent, for example where information is provided by you for insurance and or risk purposes, we will not collect sensitive information about you. Exceptions to this include where the information is required by law, or for the establishment, exercise or defence of a legal claim.