

# **General Advice Warnings and Core Disclosures**

#### Adviser Guide

Effective: 29 April 2024

This guide provides advisers with the general advice warnings and core disclosure requirements they need to provide to their clients in accordance with their legal and Licensee requirements.

For an adviser's requirements relating to stationery, refer to the Promotion and Marketing Licensee Standard.

Part A applies to Authorised Representatives – aligned practices.

Part B applies to Employee Representatives – Insignia Financial

### **CONTENTS**

Part A – Authorised Representatives – aligned practices	2
1. Warnings, Disclosures and Disclaimers	2
Part B – Employee Representatives – Insignia Financial	15
1. Warnings, Disclosures and Disclaimers	15

## Part A – Authorised Representatives – aligned practices

### 1. Warnings, Disclosures and Disclaimers

Situation	Sample Wording
Verbal warnings –	<general advice=""></general>
GENERAL ADVICE (e.g. initial client	This advice is general nature only. I won't be able to consider whether it is appropriate for you. If you want personal advice, you can make an appointment with me and we can sit down and go through your financial and personal circumstances.
meetings, telephone conversations).	<general (tmd)="" a="" advice:="" assessing="" collecting="" determination="" include="" information="" market="" prior="" target="" to="" when=""></general>
conversations).	As you are enquiring about potentially purchasing a financial product, we need to check that you are broadly within that product's target market. To do this, we may need to ask you some questions about your circumstances. We won't be considering the appropriateness of the product at more than this broad level and you should consider this yourself.
	<general advice:="" after="" been="" ddo="" determination="" for="" has="" include="" tmd=""></general>
	We have asked these questions [and/or considered the information we already know about you] solely to assess whether you broadly fit within in the target market of the product. Based on your responses we believe this product is likely to be appropriate for you however we have not considered your specific objectives, financial situation and needs. You should consider these before making a decision as to whether to acquire the product.
	[OR]
	We have asked these questions [and/or considered the information we already know about you] solely to assess whether you broadly fit within in the target market of the product. We have not considered your specific objectives, financial situation and needs; however we believe this product is unlikely to be appropriate for you. We would like to provide you with personal advice before you make a decision as to acquire the product. I can set up an appointment for you.
	<general a="" advice:="" financial="" include="" is="" product="" reference="" specific="" there="" to="" where=""></general>
	Before making a decision to acquire a financial product, you should obtain and read a Product Disclosure Statement (PDS) relating to that product, it is important for you to consider these matters and to seek appropriate financial product advice.

Situation	Sample Wording
Verbal warnings – NO	<no advice="" execution="" only="" service="" –=""></no>
ADVICE – EXECUTION ONLY SERVICE	Our service is provided on an execution-only basis, which means we will not give you any form of general or personal advice in relation to this transaction. If you would like personal advice, you can make an appointment with me and we can sit down and go through your objectives, financial
(e.g. initial client	situation and needs.
meetings, telephone conversations).	<no (tmd)="" a="" advice="" assessing="" collecting="" determination="" execution="" include="" information="" market="" only="" prior="" service:="" target="" to="" when="" –=""></no>
	As your instructions relate to purchasing a financial product, we need to check that you are broadly within that product's target market. To do this, we may need to ask you some questions about your circumstances. We won't be considering the appropriateness of the product at more than this broad level and you should consider this yourself.
	<no advice="" after="" been="" ddo="" determination="" execution="" for="" has="" include="" only="" service:="" tmd="" –=""></no>
	We have asked these questions [and/or considered the information we already know about you] solely to assess whether you broadly fit within in the target market of the product. Based on your responses we believe this product is likely to be appropriate for you however we have not considered your specific objectives, financial situation and needs. You should consider these before making a decision as to whether to acquire the product
	[OR]
	We have asked these questions [and/or considered the information we already know about you] solely to assess whether you broadly fit within in the target market of the product. We have not considered your specific objectives, financial situation and needs; however, we believe this product is unlikely to be appropriate for you. We would like to provide you with personal advice before you make a decision as to acquire the product. I can set up an appointment for you.
	<no a="" advice="" execution="" financial="" include="" is="" only="" product="" reference="" service:="" specific="" there="" to="" where="" –=""></no>
	Before making a decision on the financial product, you should obtain and read a [Product Disclosure Statement (PDS)/Disclosure document] relating to that product, it is important for you to consider these matters and to seek appropriate advice.

Situation	Sample Wording
Verbal warnings –	<factual information=""></factual>
FACTUAL INFORMATION	This information is purely factual in nature. Please do not rely on this information to make any financial decisions as this information does not take into consideration your personal circumstances. If you would like financial product advice after this, I can set up an appointment for you.
(e.g. initial client meetings, telephone	<factual a="" financial="" include="" information:="" is="" product="" reference="" specific="" there="" to="" where=""></factual>
conversations).	Before making a decision on the financial product information you have requested, you should obtain and read a Product Disclosure Statement (PDS) relating to that product, it is important for you to consider these matters and to seek appropriate personal advice.
Core disclosure	<include all="" for="" licensees=""></include>
Important: Sign off must be obtained from	<adviser name(s)="">, <name applicable,="" authorised="" company="" corporate="" if="" individual="" ltd.="" name="" of="" otherwise="" pty.="" representative,=""> <trading applicable="" as,="" if=""> is an/are Authorised Representative(s) of</trading></name></adviser>
the Advice Compliance Helpdesk for material	<include consultum="" where="">*</include>
that varies, in any way,	Consultum Financial Advisers Pty Ltd, AFSL number 230323.
from the standard Licensee templates	<include advice="" ri="" where="">*</include>
(unless you are	RI Advice Group Pty Ltd, AFSL 238429.
accredited to undertake your own due diligence	<include lonsdale="" where="">*</include>
signoffs).	Lonsdale Financial Group Ltd AFSL 246934.

Situation	Sample Wording
	Notes:
	* Printed advertisements relating to the provision of credit must disclose "Australian Financial Services & Credit Licensee <xxxxxx>" without abbreviation of the ACL</xxxxxx>
	<ul> <li>Where there are multiple advisers and the CAR holds the business agreement, there is no requirement to list individual advisers in the Core disclosure (only applicable for websites).</li> </ul>
	<ul> <li>Where a trading name is used it must be clearly disclosed that it is the trading name of the individual or corporate (i.e. 'John Smith trading as ABC' or 'LMN Pty Ltd trading as XYZ').</li> </ul>
	The Adviser ASIC number and the fact the Licensee is an Australian Financial Services Licensee is optional.
General Advice	GENERAL ADVICE WARNING
Warning  Must be located no more than one link from the home page and titled General Advice Warning and no smaller than 8 pts Times New Roman.	Any advice on this site is general nature only and has not been tailored to your personal objectives, financial situation and needs. Please seek personal advice prior to acting on this information. Any advice on this website has been prepared without taking account of your objectives, financial situation or needs. Because of that, before acting on the advice, you should consider its appropriateness to you, having regard to your objectives, financial situation or needs.
	Notes:
	The creation of a button/link titled "General Advice Warning" is recommended.
	• If any general advice is provided on a web page then reference to the General Advice Warning must be on that page preferably at the beginning of the page. General Advice Warnings must also be on any attachments published on the website.
Website	The home page must contain the above <b>Core disclosure</b> . Your website must also include your business's registered address and any <b>Relevant</b> warnings depending on the content of your website.
Overseas warning	This site is designed for Australian residents only. Nothing on this website is an offer or a solicitation of an offer to acquire any products or services, by any person or entity outside of Australia.

Situation	Sample Wording
Terms and Conditions	TERMS AND CONDITIONS
Sample wording for the terms and conditions for use of and access	This website is operated by <business name="">, ABN <xxxxxxxxx>. We are an authorised representative of <licensee name=""> an Australian Financial Services Licensee. These are the terms and conditions for use of this site and access to the information contained on this site. By using this site, you agree to these terms and conditions.</licensee></xxxxxxxxx></business>
to the information contained on the site.	1. We and our authorising licensee and other members of the Insignia Financial Group of companies:
	<ul> <li>a) do not give any warranty or make any representation as to the accuracy, reliability, completeness or security of the information contained on this site and as to changes in circumstances after the date of publication that may impact on the accuracy of the information;</li> </ul>
	b) may change and update the information from time to time;
	c) make no representation in relation to, and are not responsible in any way, for the content of any other site you access via this site; and
	d) own the copyright in the information on this site.
	2. Users must not use or reproduce any of the trademarks or other intellectual property appearing on this site.
	3. Users of this site must not:
	a) do anything to alter or modify the information on this site;
	b) use the material on this site for any purpose other than as a source of information for personal use unless authorised to the contrary;
	c) distribute, copy or otherwise reproduce in any way any of the material available from this site unless it is expressly authorised;
	d) post any material which is defamatory, in breach of copyright, in breach of the Competition and Consumer Act 2010 or otherwise in any way unlawful or inappropriate.
	4. Users can print a hard copy of material on this site for their personal use only other than material where this is prohibited by a notice to that effect on this site.
	5. The information contained on this site is made available to residents of Australia and its territories and is not intended to be a recommendation, offer or invitation to take up securities or to make a decision in respect of any financial product or any other matter.

Situation	Sample Wording
	6. We, our authorising licensee and other members of the Insignia Financial group of companies are not liable in any way to any person for any loss, damage, cost or expense incurred as a result of the material contained on this site or from unauthorised access to, or any misuse of this site including, without limitation, any negligence by us.
	7. We, our authorising licensee and other members of the Insignia Financial group of companies are not liable in any way to any person for any loss, damage, cost or expense incurred as a result of the material contained on this site or from unauthorised access to, or any misuse of this site including, without limitation, any negligence by us.
	8. All references on this site of "\$" or "dollars" are references to Australian currency unless otherwise stated.
	9. Users of this site agree to indemnify us and other members of the Insignia Financial group of companies from all liability, cost and expense, (including legal fees) arising directly or indirectly from the use or distribution by any person of material placed on the site by the user or from the alteration, modification of or addition to material on the site by the user.
	10. We, our authorising licensee and other members of the Insignia Financial group of companies do not endorse and are not responsible for information, feedback, questions or comments placed on this site by third parties. We can reproduce, use, disclose and distribute the information to others in our absolute discretion.
	11. Links to other sites are provided for your convenience only. Any such links do not constitute or imply endorsement or recommendations of any other company, product or service or any affiliation between us and other organisation (unless otherwise expressly stated).
	12. You consent to us monitoring your use of this site and agree that we may suspend the operation of this site, or restrict your use of it, at any time and without any further notice to you.
	Notes:
	The creation of a button/link titled "Terms and Conditions" is recommended.
	You must include your company's Australian Company Number (ACN), and Australian Business Number (ABN) if the last 9 digits of the ABN are not the same as the ACN.

Situation	Sample Wording
Letterhead	The footer of the letterhead must contain in a legible font size the above <u>Core disclosure</u> and your company's Australian Company Number (ACN), and Australian Business Number (ABN) if the last 9 digits of the ABN are not the same as the ACN.
	You must also include any Relevant warnings depending on the content of the letter.
	You must have your own individual letterhead. The only exception is where you have more than one adviser associated with the same CAR, in which case a single letterhead can be used. When using the corporate letterhead there is no need for all Authorised Representatives to be listed provided that the Authorised Representatives sign-off using "Authorised Representative" under their name.
Invoices	The invoice must contain the above <u>Core disclosure</u> and your company's Australian Company Number (ACN), and Australian Business Number (ABN) if the last 9 digits of the ABN are not the same as the ACN. For example: <a href="https://doi.org/10.21/2016/nd.2.21/2016/">Adviser Name(s)&gt;, <name applicable,="" authorised="" company="" corporate="" if="" individual="" ltd.="" name="" of="" otherwise="" pty.="" representative,=""> <a href="https://doi.org/10.21/2016/">ABN (or ACN)&gt; <a href="https://doi.org/10.21/2016/">trading as, if applicable&gt; is an/are Authorised Representative(s) of <licensee details=""> an Australian Financial Services Licensee.</licensee></a></a></name></a>
Email Signature	The email signature must contain the above Core disclosure and any relevant email warnings depending on the content of the email:
The following warnings,	<include being="" is="" marketing="" material="" sent="" where=""></include>
disclosures and disclaimers must be included where applicable. When	This email is sent by or on behalf of the named sender identified above. If you do not wish to receive any email marketing material from me in the future, please forward the contents of this email to [insert name of adviser's post box – e.g. "unsubscribe@[business].com.au"] with the message "unsubscribe" in the subject box.
making selections	<include factual="" information="" is="" provided="" where=""></include>
advisers should consider the:	This information is purely factual in nature. Please do not rely on this information to make any financial decisions as this information does not take into consideration your personal circumstances. If you would like financial product advice, please let me know and I will set up an appointment for you.
email's purpose;	<include advice="" general="" is="" provided="" where=""></include>
<ul> <li>email's content</li> <li>material included / attached to the email;</li> </ul>	Any advice in this email is of a general nature only and has not been tailored to your personal objectives, financial situation and needs. Before acting on this advice, you should consider whether it is appropriate having regards to your personal objectives, financial situation and needs.
audience for the email.	

Situation	Sample Wording
	<include a="" financial="" is="" product="" reference="" specific="" there="" to="" where=""></include>
	Before making a decision to acquire a financial product, you should obtain and read a Product Disclosure Statement (PDS) relating to that product, it is important for you to consider these matters and to seek appropriate advice.
	<include if="" information="" refer="" tax="" to="" you=""></include>
	Any tax estimates provided by us are intended as a guide only and is not intended to be a substitute for specialised taxation advice. We are not registered tax agents and you should consult with a registered tax agent to determine your liabilities, obligations or claim entitlements that arise or could arise, under taxation law.
	<include information="" is="" legislative="" research,="" technical,="" there="" where=""></include>
	The material contained in this email is based on information received in good faith from third party sources, and on our understanding of legislation and Government press releases at the date of publication, which are believed to be reliable and accurate.
	Note to advisers: Any information of this nature must be reviewed for accuracy and currency where possible. If it is too difficult to verify the information, a clear reference to the provider of the information and a link to the website source (where applicable) is required. It is important that you comply with copyright and all other laws governing intellectual property, including obtaining rights/consent and quoting sources.
	Important: ASIC does not allow you to use the ASIC design, formatting etc, or reproduce their logo or other ASIC graphics without their express approval. Refer to ASIC's website for additional copyright requirements.
	<include figures="" investment="" past="" performance="" quoting="" where=""></include>
	Past performance is not a reliable guide to future returns.
	<include a="" been="" companies'="" financial="" group="" has="" insignia="" of="" particular="" products="" referred="" to="" where=""></include>
	Members of the Insignia Financial group of companies (Insignia Financial Group), associated employees or agents may have an interest in or receive monetary or other benefits from the financial products and services mentioned in this email. The Licensee is part of the Insignia Financial Group, and we may recommend financial products issued by companies within the Insignia Financial Group.

Situation	Sample Wording
	<include all="" for=""></include>
	<b>Important:</b> We take your privacy and security seriously and we will never ask you to transfer money or provide personal information via email, unless we have spoken to you in person or the transfer is an existing arrangement we have in place with you. If you receive any such request that is outside the arrangements, we have in place with you, please contact our office immediately to confirm the validity of the request, before you do anything.
Other promotional / marketing material	In addition to the above <u>Core disclosure</u> , you must include the following warning where general advice has been provided: <general advice="" warning=""></general>
The following must be used for print documents, presentations, television, radio, audio or video material etc. (e.g. seminar slides / newsletters / marketing material / advertising).	Any advice or information in this publication is of a general nature only and has not taken into account your personal objectives, financial situation and needs. Because of that, before acting on the advice, you should consider its appropriateness to you, having regard to your personal objectives, financial situation and needs.
Relevant warnings	In addition to the above Core disclosure, you must include the following relevant warnings depending on the content and purpose of the material:
The following warnings	<include a="" financial="" is="" product="" reference="" specific="" there="" to="" where=""></include>
must be used for all marketing and promotional materials	Before making a decision to acquire a financial product, you should obtain and read the Product Disclosure Statement (PDS) relating to that product, and to seek appropriate advice.
(except emails as they	<include figures="" investment="" past="" performance="" quoting="" where=""></include>
have their own).	Past performance is not a reliable guide to future returns.

Situation	Sample Wording
	<include information="" is="" legislative="" research,="" technical,="" there="" where=""></include>
	The information in this document reflects our understanding of existing legislation, proposed legislation, rulings etc as at the date of issue. In some cases, the information has been provided to us by third parties. While it is believed the information is accurate and reliable, this is not guaranteed in any way.
	Note to advisers: Any information of this nature must be reviewed for accuracy and currency where possible. If it is too difficult to verify the information, a clear reference to the provider of the information and a link to the website source (where applicable) is required. It is important that you comply with copyright and all other laws governing intellectual property, including obtaining rights/consent and quoting sources.
	Important: ASIC does not allow you to use the ASIC design, formatting etc, or reproduce their logo or other ASIC graphics without their express approval. Refer to ASIC's website for additional copyright requirements.
	<include been="" expressed="" have="" opinions="" where=""></include>
	Opinions constitute our judgement at the time of issue and are subject to change. Neither the Licensee, nor their employees or directors give any warranty of accuracy, nor accept any responsibility for errors or omissions in this document.
	<include -="" <in="" a="" been="" delete="" document="" financial="" group="" has="" insignia="" particular="" product="" referred="" this="" to="" where=""> below for radio advertisements&gt;</include>
	Members of the Insignia Financial group of companies (Insignia Financial Group), associated employees or agents may have an interest in or receive monetary or other benefits from the financial products and services mentioned <in document="" this="">. The Licensee is part of the Insignia Financial Group, and we may recommend financial products issued by companies from within the Group.</in>
Limited Information	This advice is, or may be, based on incomplete or inaccurate information relating to your relevant personal circumstances.
Warning	This lack of complete personal information limits our ability to provide recommendations that are entirely appropriate to your personal objectives, financial situation and needs. Because of this, before acting on this advice, you should consider the appropriateness of the advice, having regard to your overall personal circumstances.
	Note:
	Must be provided at the time advice is provided where the client has chosen not to provide complete personal information as part of the financial planning process.

Situation	Sample Wording
Fact finding process (strategy discussion)  This warning relates to a meeting with a client as a part of the "fact finding" or advice development process and may include strategic discussions.	The purpose of this meeting is to obtain a better understanding of your personal objectives, circumstances and needs so we can develop recommendations that are appropriate for you. This will include discussions in relation to financial concepts and some of the possible strategies which may generally be available and is all part of the "fact-finding" and advice development process. Any views expressed are preliminary in nature and should not be relied upon to make any decision or taken as advice tailored to your personal circumstances. Our recommendations will be provided to you later in a Statement of Advice (or Record of Advice, where applicable).  Note:  This warning must be included at the beginning of the meeting.
Referral Arrangements – Referral fees PAID to 3rd Parties for referrals received	We have arrangements in place to pay a referral fee, commission, or other benefit to [Party Name] when they refer new clients to us.  If these recommendations proceed, [Party Name] will receive XXXX% of the Initial Fees (net of GST), being \$XXXX or a flat fee of \$XXXX for the referral of your business to us.
(edit as required for referrals from an associated entity or related third party)	<b>Use the following wording where a dollar amount cannot be provided and a worked example is required&gt;</b> We have arrangements in place to pay a referral fee, commission, or other benefit to [Party Name] when they refer new clients to us. If these recommendations proceed, [Party Name] will receive a payment for the referral of your business to us. For example, [provide a worked example illustrating the payment you would provide for a typical example referral from a third party to provide financial advice.]
	<ul> <li><use -="" appropriate="" as="" edit="" for="" parties="" related="" relationship="" the="" third="" to=""></use></li> <li>[Adviser Name] is a [Director/Shareholder/Insert Other] of [Party Name] and has a [controlling] / [non-controlling] shareholding in the entity. As a result [Adviser Name] will/may receive dividends/distributions and/or income from [Party Name].</li> <li><use -="" advice="" and="" appropriate="" as="" edit="" if="" is="" nature="" no="" of="" or="" provided="" referral="" relationship="" the="" to=""></use></li> <li>Regardless whether or not you proceed with us, [Party Name] will receive \$XXXX for the referral of your business to us.</li> </ul>

Situation	Sample Wording
	Notes:
	<ul> <li>If no advice is provided but a referral fee is still payable, this disclosure is still required.</li> </ul>
	Advisers must make this disclosure verbally where they provide verbal advice.
	Where the referral is provided as part of the adviser's written advice, the disclosure must be made in the relevant advice document and FSG. Please refer to the Licensee advice templates (such as the SOA and ROA) for this wording.
Referral	We have referred you to [Party Name] for [detail type of services/referral arrangement].
Arrangements – Referral fees	<include a="" fee="" if="" is="" paid="" referral=""></include>
RECEIVED from 3rd Parties for referrals	As such, we [will] / [may] receive a payment, fee, commission or other benefit for any referral we make to this provider. If you use their services, this benefit will be XXXX% of the Initial Fees (net of GST), being \$XXXX or a flat fee of \$XXXX for the referral of your business to [Party Name].
made	For example, [provide a worked example illustrating the payment you would receive for a typical example referral to a third party.
(edit as required for referrals to an	Loan Example: If you established a loan for \$XXXXXX we would receive up to \$XXXX upfront and up to \$XXX per annum thereafter.
associated entity or third party)	Insurance Example: If you established an insurance policy with an annual premium of \$XXXX we would receive up to \$XXXX in the first year. In addition, we would receive up to \$XXXX per annum thereafter.]
	<use appropriate="" as="" edit="" for="" parties="" related="" relationship="" the="" third="" to="" –=""></use>
	[Adviser Name] is a [Director/Shareholder/Insert Other] of [Party Name] and has a [controlling] / [non-controlling] shareholding in the entity. As a result [Adviser Name] will/may receive dividends/distributions and/or income from [Party Name].
	<use all="" for=""></use>
	You can contact [Party Name] via [provide contact details].
	Please note: neither I nor [Licensee Name] shall be liable for the provision of advice and services provided by the third party.

Situation	Sample Wording
	Notes:
	<ul> <li>This disclosure must be given at the time of the referral and via the same means as the referral for all referrals. Where the referral is provided verbally then the disclosure must be made during that conversation with the client (and recorded in a file note).</li> </ul>
	This disclosure can be used where the adviser provides verbal advice or where no written advice has been provided.
	Where the referral is provided as part of the adviser's written advice, the disclosure must be made in the relevant advice document and FSG. Please refer to the Licensee advice templates for this wording.

### Part B – Employee Representatives – Insignia Financial

This table includes sample wording for warnings, disclosures and disclaimers for a set of scenarios.

#### 1. Warnings, Disclosures and Disclaimers

Situation	Sample Wording
Verbal warnings –	<general advice=""></general>
GENERAL ADVICE (e.g. initial client	This advice is general nature only. I won't be able to consider whether it is appropriate for you. If you want personal advice, you can make an appointment with me and we can sit down and go through your financial and personal circumstances.
meetings, telephone conversations).	<general (tmd)="" a="" advice:="" assessing="" collecting="" determination="" include="" information="" market="" prior="" target="" to="" when=""></general>
	As you are enquiring about potentially purchasing a financial product, we need to check that you are broadly within that product's target market. To do this, we may need to ask you some questions about your circumstances. We won't be considering the appropriateness of the product at more than this broad level and you should consider this yourself.
	<general advice:="" after="" been="" ddo="" determination="" for="" has="" include="" tmd=""></general>
	We have asked these questions [and/or considered the information we already know about you] solely to assess whether you broadly fit within in the target market of the product. Based on your responses we believe this product is likely to be appropriate for you however we have not considered your specific objectives, financial situation and needs. You should consider these before making a decision as to whether to acquire the product.
	[OR]
	We have asked these questions [and/or considered the information we already know about you] solely to assess whether you broadly fit within in the target market of the product. We have not considered your specific objectives, financial situation and needs; however we believe this product is unlikely to be appropriate for you. We would like to provide you with personal advice before you make a decision as to acquire the product. I can set up an appointment for you.

Situation	Sample Wording
	<general a="" advice:="" financial="" include="" is="" product="" reference="" specific="" there="" to="" where=""></general>
	Before making a decision to acquire a financial product, you should obtain and read a Product Disclosure Statement (PDS) relating to that product, it is important for you to consider these matters and to seek appropriate financial product advice.
Verbal warnings – NO	<no advice="" execution="" only="" service="" –=""></no>
ADVICE - EXECUTION ONLY SERVICE	Our service is provided on an execution-only basis, which means we will not give you any form of general or personal advice in relation to this transaction. If you would like personal advice, you can make an appointment with me and we can sit down and go through your objectives, financial
(e.g. initial client meetings, telephone	situation and needs. <no (tmd)="" a="" advice="" assessing="" collecting="" determination="" execution="" include="" information="" market="" only="" prior="" service:="" target="" to="" when="" –=""></no>
conversations).	
	As your instructions relate to purchasing a financial product, we need to check that you are broadly within that product's target market. To do this, we may need to ask you some questions about your circumstances. We won't be considering the appropriateness of the product at more than this broad level and you should consider this yourself.
	<no advice="" after="" been="" ddo="" determination="" execution="" for="" has="" include="" only="" service:="" tmd="" –=""></no>
	We have asked these questions [and/or considered the information we already know about you] solely to assess whether you broadly fit within in the target market of the product. Based on your responses we believe this product is likely to be appropriate for you however we have not considered your specific objectives, financial situation and needs. You should consider these before making a decision as to whether to acquire the product
	[OR]
	We have asked these questions [and/or considered the information we already know about you] solely to assess whether you broadly fit within in the target market of the product. We have not considered your specific objectives, financial situation and needs; however, we believe this product is unlikely to be appropriate for you. We would like to provide you with personal advice before you make a decision as to acquire the product. I can set up an appointment for you.
	<no a="" advice="" execution="" financial="" include="" is="" only="" product="" reference="" service:="" specific="" there="" to="" where="" –=""></no>
	Before making a decision on the financial product, you should obtain and read a [Product Disclosure Statement (PDS)/Disclosure document] relating to that product, it is important for you to consider these matters and to seek appropriate advice.

Situation	Sample Wording
Verbal warnings – FACTUAL INFORMATION	<factual information=""></factual>
	This information is purely factual in nature. Please do not rely on this information to make any financial decisions as this information does not take into consideration your personal circumstances. If you would like financial product advice after this, I can set up an appointment for you.
(e.g. initial client meetings, telephone	<factual a="" financial="" include="" information:="" is="" product="" reference="" specific="" there="" to="" where=""></factual>
conversations).	Before making a decision on the financial product information you have requested, you should obtain and read a Product Disclosure Statement (PDS) relating to that product, it is important for you to consider these matters and to seek appropriate personal advice.
Other marketing /	<general advice="" warning=""></general>
promotional material The following warnings must be used for print	Any advice or information in this publication is of a general nature only and has not taken into account your personal objectives, financial situation and needs. Because of that, before acting on the advice, you should consider its appropriateness to you, having regard to your objectives, financial situation or needs.
documents, presentations,	<delete a="" financial="" if="" is="" no="" product="" reference="" specific="" there="" to=""></delete>
television, radio, audio or video material (e.g.	Before making a decision to acquire a financial product, you should obtain and read the Product Disclosure Statement (PDS) relating to that product, it is important for you to consider these matters and to seek appropriate advice.
seminar slides / newsletters / marketing material / advertising).	<delete below="" figures="" if="" investment="" not="" paragraph="" past="" performance="" quoting=""></delete>
	Past performance is not a reliable guide to future returns.
	<include information="" is="" legislative="" research,="" technical,="" there="" where=""></include>
	The information in this document reflects our understanding of existing legislation, proposed legislation, rulings etc as at the date of issue. In some cases, the information has been provided to us by third parties. While it is believed the information is accurate and reliable, this is not guaranteed in any way.
	Note to advisers: Any information of this nature must be reviewed for accuracy and currency where possible. If it is too difficult to verify the information, a clear reference to the provider of the information and a link to the website source (where applicable) is required. It is important that you comply with copyright and all other laws governing intellectual property, including obtaining rights/consent and quoting sources.

Situation	Sample Wording
	Important: ASIC does not allow you to use the ASIC design, formatting etc, or reproduce their logo or other ASIC graphics without their express approval. Refer to ASIC's website for additional copyright requirements.
	<include been="" expressed="" have="" opinions="" where=""></include>
	Opinions constitute our judgement at the time of issue and are subject to change. Neither the Licensee, nor their employees or directors give any warranty of accuracy, nor accept any responsibility for errors or omissions in this document.
	<include -="" <in="" a="" been="" companies="" delete="" document="" financial="" group="" has="" insignia="" of="" particular="" product="" referred="" this="" to="" where=""> below for radio advertisements&gt;</include>
	Members of the Insignia Financial group of companies (Insignia Financial Group), including associated employees or agents may have an interest in or receive monetary or other benefits from the financial products and services mentioned <in document="" this="">. The Licensee is part of the Insignia Financial Group, and we may recommend financial products issued by companies within the Insignia Financial Group.</in>
	<include bridges="" where=""></include>
	<adviser name="">, Representative of Bridges Financial Services Pty Limited ABN 60 003 474 977, AFSL 240837.</adviser>
	<include shadforth="" where=""></include>
	<adviser name="">, Representative of Shadforth Financial Group Limited ABN 27 127 508 472, AFSL 318613.</adviser>
	Notes:
	The Licensee registered business address is not required to be included in radio advertisements.
	Sign off must be obtained from the Licensee for material that varies, in any way, from the standard Licensee templates.

Situation	Sample Wording
Limited Information Warning	This advice is, or may be, based on incomplete or inaccurate information relating to your relevant personal circumstances.
	This lack of complete personal information limits our ability to provide recommendations that are entirely appropriate to your personal objectives, financial situation and needs. Because of this, before acting on this advice, you should consider the appropriateness of the advice, having regard to your overall personal circumstances.
	Note:
	<ul> <li>Must be provided at the time advice is provided where the client has chosen not to provide complete personal information as part of the financial planning process.</li> </ul>
Fact finding process (strategy discussion)	The purpose of this meeting is to obtain a better understanding of your personal objectives, circumstances and needs so we can develop recommendations that are appropriate for you. This will include discussions in relation to financial concepts and some of the possible strategies which
This warning relates to a meeting with a client as a part of the "fact finding" or advice development process and may include strategic discussions.	may generally be available and is all part of the "fact-finding" and advice development process. Any views expressed are preliminary in nature and should not be relied upon to make any decision or taken as advice tailored to your personal circumstances. Our recommendations will be provided to you later in a Statement of Advice (or Record of Advice, where applicable).  Note:  This warning must be included at the beginning of the meeting.
Referral Arrangements – Referral fees PAID to 3rd Parties for referrals received (edit as required for referrals from an associated entity or related third party)	We have arrangements in place to pay a referral fee, commission, or other benefit to [Party Name] when they refer new clients to us.  If these recommendations proceed, [Party Name] will receive XXXX% of the Initial Fees (net of GST), being \$XXXX or a flat fee of \$XXXX for the referral of your business to us.

Situation	Sample Wording
	<use a="" amount="" and="" be="" cannot="" dollar="" example="" following="" is="" provided="" required="" the="" where="" wording="" worked=""></use>
	We have arrangements in place to pay a referral fee, commission, or other benefit to [Party Name] when they refer new clients to us. If these recommendations proceed, [Party Name] will receive a payment for the referral of your business to us. For example, [provide a worked example illustrating the payment you would provide for a typical example referral from a third party to provide financial advice.]
	<use -="" appropriate="" as="" associated="" edit="" entities="" for="" or="" parties="" related="" relationship="" the="" third="" to=""></use>
	[Adviser Name] is a [Director/Shareholder/Insert Other] of [Party Name] and has a [controlling] / [non-controlling] shareholding in the entity. As a result [Adviser Name] will receive dividends/distributions and/or income from [Party Name].
	<use -="" advice="" and="" appropriate="" as="" edit="" if="" is="" nature="" no="" of="" or="" provided="" referral="" relationship="" the="" to=""></use>
	Regardless whether or not you proceed with us, [Party Name] will receive \$XXXX for the referral of your business to us.
	Notes:
	<ul> <li>If no advice is provided but a referral fee is still payable, this disclosure is still required.</li> </ul>
	Advisers must make this disclosure verbally where they provide verbal advice.
	• Where the referral is provided as part of the adviser's written advice, the disclosure must be made in the relevant advice document and FSG. Please refer to the Licensee advice templates (such as the SOA and ROA) for this wording.
Referrals to the same corporate group as INSIGNIA FINANCIAL	We have referred you to [Party Name] who is part of, or associated with the Insignia Financial group of companies ("Insignia Financial Group"). We are representatives of [Licensee name] which is a wholly owned subsidiary within the Insignia Financial Group, therefore we may receive a direct or indirect benefit from any referral we make to [Party Name]

Situation	Sample Wording
Referral	We have referred you to [Party Name] for [detail type of services/referral arrangement].
Arrangements – Referral fees	<include a="" fee="" if="" is="" paid="" referral=""></include>
RECEIVED from 3rd Parties for referrals	As such, we [will] / [may] receive a payment, fee, commission or other benefit for any referral we make to this provider. If you use their services, this benefit will be XXXXW of the Initial Fees (net of GST), being \$XXXXX or a flat fee of \$XXXXX for the referral of your business to [Party Name].
made	For example, [provide a worked example illustrating the payment you would receive for a typical example referral to a third party.
(edit as required for referrals to an	Loan Example: If you established a loan for \$XXXXXX we would receive up to \$XXXX upfront and up to \$XXX per annum thereafter.
associated entity or third party)	Insurance Example: If you established an insurance policy with an annual premium of \$XXXX we would receive up to \$XXXX in the first year. In addition, we would receive up to \$XXXX per annum thereafter.]
	<use appropriate="" as="" associated="" edit="" entities="" for="" or="" parties="" related="" relationship="" the="" third="" to="" –=""></use>
	[Adviser Name] is a [Director/Shareholder/Insert Other] of [Party Name] and has a [controlling] / [non-controlling] shareholding in the entity. As a result [Adviser Name] will/may receive dividends/distributions and/or income from [Party Name].
	<use all="" for=""></use>
	You can contact [Party Name] via [provide contact details].
	Please note: neither I nor [Licensee Name] shall be liable for the provision of advice and services provided by the third party.
	Notes:
	<ul> <li>This disclosure must be given at the time of the referral and via the same means as the referral for all referrals. Where the referral is provided verbally then the disclosure must be made during that conversation with the client (and recorded in a file note).</li> </ul>
	This disclosure can be used where the adviser provides verbal advice or where no written advice has been provided.
	Where the referral is provided as part of the adviser's written advice, the disclosure must be made in the relevant advice document and FSG. Please refer to the Licensee advice templates for this wording.

29 April 2024 – **Adviser use only**