

# Financial Services & Credit Guide - Part A

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## About Modoras

Modoras was founded in 1984 on a passionate belief that still guides us today: that achieving more is possible for our clients, team members and those people yet to join the Modoras financial family. Recognised as a leader in its field, Modoras is located in Queensland, New South Wales and Victoria.

Our vision is to make the difference to even more lives, so more Australians experience the confidence and joy that comes from being financially secure. When a team of professionals work together as one, applying laser focus to turning your dreams into reality, financial security is just the beginning.

At Modoras, it isn't only about investing wisely. It's about truly understanding each and every client, so our team of professionals can confidently deliver tailored recommendations spanning every facet of the client's financial life: personal cash flow, investments, asset protection, superannuation, retirement planning, and more. And we remain by our clients' side throughout their financial journey, sharing financial intelligence to enable them to make well-informed financial decisions, every step of the way.

So, if you are yet to join the Modoras family, invite us along on your financial journey. We're confident our expert guidance can take you far. If you're already a member, thank you for the trust you've placed in us. We look forward to continuing to manage, protect and grow what's important to you.

### Lack of independence statement

Modoras and its representatives do not fall into the definition of 'independent, unbiased or impartial' due to the association with product providers through the use of Modoras Asset Management Separately Managed Accounts (SMAs). We also receive life insurance commissions where we recommend life insurance products.

However, we're not exclusively aligned with any one provider, which enables us to provide our clients with a wide range of product options relevant to their needs and to act in their best interests.



## About this guide

### **This Financial Services and Credit Guide (FSCG) is intended to help you:**

- understand the financial advice, services and products we're authorised to provide or assist you with
- help you to decide whether to engage a Modoras planner to provide professional advice on your financial future

The FSCG is divided into two parts: Part A and Part B. Both parts must be read together.

### **Part A sets out, among other things:**

- who we are
- the financial advice and services we provide
- the credit assistance we provide
- our relationships and associations
- how we get paid for the services we provide

### **Part B sets out, among other things:**

- who your Modoras financial planner is
- the financial advice and services they're authorised to provide
- the credit assistance they're authorised to provide (if applicable)
- who they're associated with
- how they're remunerated

Your financial planner will provide you with Part B at the earliest opportunity (or sooner, if you ask for it).



## Who will be providing financial services to you?

Modoras Pty Ltd ('Modoras', 'we,' 'us' or 'our') (ABN 86 068 034 908) provides wealth advice and credit assistance through our Australian financial services licence (AFSL) 233209 and Australian credit licence (ACL) 233209 respectively. Modoras is part of a group of companies and related business entities that provide wealth management, accounting, taxation and business advice and services, and credit assistance. They include 'corporate authorised representatives' we've authorised to provide wealth advice under our licences.

You may receive a Statement of Advice from us that sets out our personal advice to you. You may also receive a Product Disclosure Statement which sets out information about a financial product you can acquire.

We act on our own behalf when providing the financial product advice services we are authorised to provide. When we deal in financial products we are acting on your behalf as our client. (For the complete list of companies and entities, please see the 'The Modoras Group' section on page 20.)

## Our financial planners

Modoras is responsible for the financial advice and services provided to you, as described in this FSCG — Part A. The advice and services are provided by our planners, who are 'authorised representatives' of Modoras. For information about each planner's individual authorisations, please refer to FSCG — Part B. Modoras takes the competency of our authorised representatives seriously. They're required to have up-to-date skills and knowledge and to operate only within the limits of their authorisation (these limits are detailed in FSCG — Part B).

## What advice and products are we authorised to provide or arrange for you

We can give you advice on	We can arrange the following products for you <sup>2</sup> :
<ul style="list-style-type: none"> <li>• cash flow</li> <li>• debt management</li> <li>• personal insurance</li> <li>• superannuation (including SMSFs<sup>1</sup>)</li> <li>• retirement planning</li> <li>• estate planning (financial planning)</li> <li>• leveraged investments</li> <li>• investments</li> <li>• direct equities<sup>1</sup></li> <li>• margin lending<sup>1</sup></li> <li>• loans (credit assistance)<sup>1</sup></li> <li>• social security<sup>1</sup></li> </ul>	<ul style="list-style-type: none"> <li>• deposits and payments</li> <li>• personal insurance and life investments</li> <li>• superannuation</li> <li>• retirement-savings accounts</li> <li>• securities (e.g. shares)</li> <li>• managed investments (e.g. investor-directed portfolio services)</li> <li>• leveraged investments</li> <li>• standard margin lending</li> <li>• government debentures, stocks or bonds</li> </ul>

1.Only some of our financial planners are authorised to provide advice on these areas as they require specialised or technical knowledge.

2.Your financial planner typically only recommends products listed on the Modoras Approved Product List (APL). Depending on the circumstances, your planner may recommend a product not on the APL.

## Our financial planning process

Typically, these are the four steps to financial advice the Modoras Way:



### STEP 1 Understanding you

We'll explain the difference between goals, strategies and solutions – and then help you define your own financial and lifestyle goals. Once you've set your goals, we'll continue gathering data using our 'Understanding You' information collection tools. This will give us an overview of your current financial position, including what you earn and spend (i.e. your cash flow), what you own and owe (i.e. your assets and liabilities), and your insurances and estate planning needs. We'll also ask you what you think and feel about investment risk (your investment profile). This step will help us **connect deeply** with you — to truly understand where you are now and what more may be possible for your financial future.



### STEP 2 Preparing your financial plan

Once you've given us the go-ahead, we'll collect and analyse the relevant information, and prepare a financial plan (also known as a statement of advice, or SOA) for you. Based on your financial potential and investment profile, we'll **confidently and decisively** put forward strategies and make recommendations we believe will help you achieve your goals. As well as strategies and recommendations, the plan can prescribe financial products needed to implement it.



### STEP 3 Implementing your financial plan

We'll **lead you to action** by taking a hands-on approach, coordinating all parties to ensure your financial plan is implemented as it should be - you can rest easy, confident we've taken care of things. During the implementation phase, we'll keep you informed of the progress towards implementing the advice and answer any questions you may have. If you require the expertise of another financial professional, such as an accountant or estate-planning lawyer, we'll also help you connect with them.



### STEP 4 Keeping you on track

The only constant in life is change. Your financial plan needs to be adaptable to changes in your goals and financial circumstances, economic conditions and financial markets, and laws and regulations that impact you. Subject to your agreement with us, at least once a year we'll review your financial plan and help to ensure you're still on track to achieve your goals. (If the review needs to be fast-tracked, it will be.) If necessary and in consultation and agreement with you, we'll make adjustments to your financial strategy and repeat step 3 above as required.

## Confirming our advice to you

We'll confirm our advice to you by providing you with one or more of the following documents:

### Statement of advice (SOA)

If we give you personal financial advice that takes into account your individual needs, objectives and financial circumstances, we'll provide you with a financial plan, also known as a statement of advice (SOA).

The SOA details:

- your personal information
- your financial planner's recommendations
- the fees for our advice and other services
- any associations between Modoras and its authorised representative and other entities

The SOA should contain enough information for you to make an informed decision on whether to act on the advice. You can request a copy of your SOA at any time up to seven years after the relevant advice was provided by emailing [info@modoras.com](mailto:info@modoras.com) or phone 1300 888 803.

### Record of advice (ROA)

If we give you additional personal financial advice and if your individual needs, objectives and financial circumstances have not changed significantly since we previously gave you advice, we'll provide you with a record of advice (ROA) (instead of an SOA). You can request a copy of your ROA at any time up to seven years after the additional advice was provided by emailing [info@modoras.com](mailto:info@modoras.com) or phone 1300 888 803.

### Product disclosure statements (PDS)

If we recommend a specific financial product, we'll physically or virtually provide you a product disclosure statement (PDS) (or similar document) issued by the product provider. The PDS contains information about the product's features and benefits, fees and charges, and the risks associated with it. It enables you to make an informed decision about whether to acquire the product.





## Your relationship with us

We'll work with you to agree on the advice and services Modoras provides to you and how often we provide them. Subject to your agreement with us, at least once a year we'll review your financial plan (i.e. your statement of advice, or SOA) and help ensure you're still on track to achieve your goals. The scope and frequency of these reviews will be documented in a '**client service agreement**'. You can contact us at any time to give us updates, requests and /or instructions on your financial position and / or financial product/s. These can be provided verbally or in writing. For your and our protection, we reserve the right to ask you to confirm your instructions in writing before we act on them.

## Our financial planning fees

Modoras is mainly a fee-for-advice business. You can partner with us in one (or both) of two ways:

- having an ongoing relationship
- seeking advice for specific needs

The fees charged will:

- depend on the complexity of your circumstances and goals and the scope of the advice we provide
- vary based on whether the advice is ongoing or for a specific piece of work
- vary based on whether specialist advice is required (e.g. margin lending, self-managed super funds, leveraged investments, direct equities, credit assistance)
- be charged as a flat-dollar fee, a percentage-based fee, or a combination of both
- be discussed and agreed with you beforehand (including any revised estimates outside of the indicative range)
- be disclosed in your financial plan (also known as a statement of advice, or SOA) and, if applicable, client service agreement
- be paid by you, either directly or from your product



## Plan preparation fees

Plan Preparation	Indicative fee (inc. GST)
<ul style="list-style-type: none"> <li>• <b>1st appointment</b> - to collect data, get a snapshot of your current financial position, and establish your goals and objectives. (We may or may not charge you for this appointment. If we do, it will be with your prior agreement.)</li> <li>• <b>2nd appointment</b> - to outline how we can help you and confirm whether you'd like us to prepare a financial plan (also known as a statement of advice, or SOA) for you.</li> <li>• <b>Needs and risk assessments (where required)</b> - research, analysis and selection of strategies, products and investment options to help you achieve your goals and objectives, preparation of the SOA, including our financial advice and recommendations. (This can involve up to 40 hours or more of work.)</li> <li>• <b>Presentation of your written financial plan</b> - including a detailed explanation of its strategies and recommendations and answers to all your questions.</li> </ul>	\$2,200 to \$11,000



## Plan implementation fees

Plan implementation	Indicative fee (inc. GST)
<p>Subject to your approval, the implementation of the SOA may include:</p> <ul style="list-style-type: none"><li>• Project managing the implementation of your financial plan</li><li>• Minor variations to our initial advice</li><li>• Coordination and resolution of queries between other service professionals (e.g. accountants, solicitors) and you</li><li>• Preparation and lodgement of paperwork with the selected product providers (e.g. fund managers, superannuation providers)</li><li>• Coordination and resolution of queries between the product providers and you</li><li>• Keeping you informed of progress, including additional appointments as required</li><li>• Any extra administrative tasks required</li></ul>	\$5,500 to \$27,500



## Ongoing service fees

Ongoing service	Indicative fee (inc. GST)
<p>Subject to your agreement with us, we'll review your financial plan at least once a year and, if necessary, adjust it to help ensure you remain on track to achieve your goals.</p> <p>This ongoing service would be described in a document called a 'client service agreement'.</p>	<p>\$2,200 to \$11,000 per annum (p.a.)</p> <p>or</p> <p>0.5% to 1.5% p.a. of assets under management. For example, for a \$100,000 portfolio with an ongoing service fee of 1.1% p.a., we would charge \$1,100 p.a.</p> <p>or</p> <p>a combination of the two methods above (i.e. flat-dollar fee plus percentage-based fee)</p>

## Ad-hoc service fees

Ad hoc service	Position	Hourly rate (inc. GST)
<p>Depending on your circumstances, we can provide you with ad-hoc advice for a specific piece of work.</p> <p>If we think it would be more economical for you to put in place an ongoing service agreement with us, we'll suggest one.</p> <p><b>Project management</b></p> <p>For more complex projects, you can engage us at an hourly rate to facilitate the project or advocate on your behalf.</p> <p>This may include time doing research and analysis, drafting and reviewing documents, providing written advice, writing letters or emails, making phone calls, and travelling.</p> <p>All fees will be discussed and agreed with you beforehand.</p>	Director	\$660
	Senior / Specialist Planner	\$550
	Financial Planner	\$440
	Planning Associate	\$250
	Personal Service Associate	\$220
	Business Associate	\$110

## Referral fees

When conducting a holistic review of your financial situation, we may identify other services that might benefit you. If we do, we may refer you to another provider. Similarly, other providers with whom we have a relationship may refer you to us for financial advice. If any referral fees apply, we'll disclose them to you. However, in most cases Modoras will only charge for services we provide to you directly.

## Our financial planning commissions

We may receive commissions from product providers, as follows.

### Life insurance

If we arrange life insurance for you, we'll receive the following commissions from the life insurer.

*These commissions are included in the premium you pay the insurer.*

#### Level Commissions:

Where we recommend the use of a level commission arrangement we will receive up to 33% per annum of your annual insurance premium.

#### Upfront Commissions:

Policies in place prior to 1 January 2020 - Upfront commission of up to 135% on the first years premium, and ongoing commission of up to 33% per annum on the renewal premium.

Policies put into place after 1 January 2020 - Upfront commission of 66% on the first years premium, and ongoing commission of 22% per annum on the renewal premium. See example below:

#### Example:

If we recommended you put in place an insurance policy and the premium is \$2,000 per annum, we would receive 66% or \$1,320 of the first years premium as an upfront commission, and 22% or \$440 of the renewal premium assuming it remains unchanged each year.

1. Commissions are paid before the 15% premium tax rebate is applied and after all relevant loadings, discounts or other rebates are applied. Commissions are not paid on policy fees or stamp duty if they are charged separately.
2. Where a policy is cancelled within the first two years of being placed into force, or you make a successful claim or reach the benefit expiry age within 12 months of taking out or renewing your policy, the product provider may clawback commission paid. In this case we may seek compensation from you.
3. Life insurance policies that were in place before the Life Insurance Framework was introduced on 1 January 2018 are 'grandfathered'. This means the terms of a policy (including commission rates) written before then are still valid.



## Other benefits we receive

On occasion, your financial planner may be entitled to benefits, often in the form of 'sponsorships'. These may include and are not limited to:

- training or education courses
- catered functions
- promotional materials or goods

*These sponsorships are not an additional cost to you.*

Modoras's representatives can only accept other benefits (e.g. wine, event tickets) valued at less than \$300 per planner per year. While many of our valued clients like to express their gratitude by giving their planner a gift, seeing you achieve your goals is all the thanks we need. We maintain a register of any alternative remuneration we receive. We'll happily show you the register if you ask for it. For more information on how Modoras's representatives are remunerated, please see FSCG — Part B.

## What is 'credit assistance'?

'Credit assistance' occurs when a 'credit representative':

- suggests a consumer apply for a loan (also known as a 'credit contract'), an increase to a loan, or a lease
- suggests a consumer stay with an existing credit provider or lessor
- assists a consumer to apply for, or increase, a loan or lease

Our credit representatives are authorised to engage in specified credit activities on behalf of the licensee, namely Modoras Pty Ltd (Australian credit licence 233209). The credit products we consider are regulated under the National Consumer Credit Protection Act.

## Our credit representatives

Modoras is responsible for the credit assistance provided to you, as described in this FSCG — Part A. This assistance is provided through our credit representatives. FSCG — Part B shows you which of our financial planners ('authorised representatives') are also credit representatives — and the credit assistance they can provide you. If you need credit assistance and the authorised representative giving you financial advice is not also a credit representative, they will need to refer you to either a Modoras credit representative or a suitably qualified third party associated with Modoras. When providing credit assistance, our credit representatives do not act as your or the credit provider's agent — except to the extent necessary to facilitate the loan application. Modoras takes the competency of our credit representatives seriously. They are required to have up-to-date skills and knowledge and to operate only within the limits of their authorisation (these limits are detailed in FSCG — Part B).



## Our credit assistance process

Typically, these are the four steps in credit assistance the Modoras way:

### **Understanding you**

We'll explain the difference between goals, strategies and solutions — and then help you define your own financial and lifestyle goals. Once you've set your goals, we'll continue gathering data using our 'Understanding You' information collection tools. This will give us an overview of your current financial position, including what you earn and spend (i.e. your cash flow), what you own and owe (i.e. your assets and liabilities), and your insurances and estate planning needs. This in turn will help us (and, later, the lender) determine your borrowing capacity and ability to service the proposed loan amount over its entire term.

### **Comparing lending options**

Depending on your circumstances, we'll either refer you to a lending specialist or one of our credit representatives will provide you with a shortlist of lending options to choose from. This shortlist will be based on information provided by our aggregator, Australian Finance Group (AFG) (please see the 'Our aggregator' section on page 19). AFG's lender panel comprises of over 70 lenders and more than 3,800 finance products.

### **Implementing the selected lending option**

After you've selected a preferred lending option, your loan application will be submitted to the relevant lender. Modoras or the lending specialist will liaise with the lender on your behalf until they make a decision on your application. Upon approval of your application, the lender will send you the loan contract to sign, after which you'll be able to draw on the funds.

### **Keeping you on track**

It's important to review your loans regularly. If we've prepared a financial plan and provided you with credit assistance, we'll (subject to your agreement with us) review it at least once a year, including, if necessary, any loans and other debts.

## Preliminary assessment

When providing credit assistance, we'll ask you about your goals, objectives, and current financial situation (the last of which we'll seek to verify). We'll then make a written 'preliminary assessment' as to whether the proposed credit contract or loan, is not considered 'unsuitable' for you. As part of this assessment, we may provide you with a comparison of the lending options available to you. If it's not unsuitable for you, we'll suggest you apply (or assist you to apply) for a loan or for an increase to the loan amount, or suggest you remain with an existing credit provider.

### Obtaining a copy

You may request a free copy of a preliminary assessment at any time up to seven years after the date of our quote for the credit assistance we gave you. The maximum number of business days we have to provide the assessment to you are shown below:

Time since the quote date	Maximum time to give you the assessment
Up to 2 years	7 business days after we receive your request
Between 2 and 7 years	21 business days after we receive your request

We're not required to provide a copy of the preliminary assessment if one or more of the following applies:

- your request is made more than seven years after entering into the credit contract or credit-limit increase
- the credit contract is not entered into
- the credit limit is not increased

## When is a credit contract 'unsuitable'?

A credit contract is 'unsuitable' if we reasonably believe:

- the contract does not meet your requirements or objectives
- you're unlikely to be able to comply with your financial obligations under the contract
- you're unlikely to be able to comply with your financial obligations under the contract without experiencing substantial hardship



## Credit quote

If the credit assistance you require is substantial and complex, you'll be sent a credit quote explaining the loan application process and associated fees. After you've approved the quote, the credit assistance will proceed.

## Credit Proposal Disclosure document

Once a lender has been identified and before you apply for the loan, we'll provide you with a credit proposal disclosure document. This document will contain details about the:

- fee payable by you to Modoras (if applicable)
- a reasonable estimate of the commission to be received by Modoras, any credit representative or associate of Modoras, or any referrer
- if applicable, a reasonable estimate of the loan application fees and charges payable by you to the lender
- if the credit is to be used to pay any of the abovementioned amounts, a reasonable estimate of the amount of credit left after paying these amounts

## Credit providers

The main credit providers we refer clients to are:

- ANZ
- CBA
- Macquarie
- NAB
- St George
- Westpac



## Our aggregator

Our clients' credit contracts are facilitated by Australian Finance Group (AFG) (ABN 11 066 385 822 and ACL 389087). AFG is an aggregator, which means it acts as an intermediary between finance brokers (and credit-assistance providers like us) and lenders (e.g. banks). AFG's lender panel comprises over 70 lenders and more than 3,800 financial products. (Only some of Modoras's credit representatives are authorised to access AFG's services.) AFG charges us a fee according to our contractual arrangements with them. This fee may be in the form of:

- a share of the commission paid to us by a credit provider
- a membership fee
- a monthly fee for each of our accredited loan writers

## Our credit-assistance fees

We may charge you fees for the preparation, presentation and implementation of the credit assistance we give you. These fees will be based on the complexity of your requirements and the scope of the assistance required. We'll discuss any applicable fees with you and ask you to approve them before we provide the assistance.

Service	Hourly fee (inc. GST)	Indicative total (inc. GST)
Credit assistance	\$440	\$880 to \$6,600

## Our credit-assistance commissions

If you take out a credit product through us, we may receive commissions from the credit provider. The credit provider may pay us an upfront commission of 0.45% to 0.77% of your approved credit limit. They may also pay us 0.1% p.a. to 0.35% p.a. of the net amount owing on your finance, commencing the first month after your loan was settled (i.e. drawn-down).

*These commissions are not an additional cost to you.*

## The Modoras Group

The Modoras Group comprises a number of companies and related business entities that provide a full range of advice and services covering:

- wealth management
- accounting
- tax
- business advice
- credit assistance

These companies and entities (listed below) are partially or wholly owned by or directly affiliated with the Modoras Group.

## Wealth

Modoras Pty Ltd (ABN 86 068 034 908) is an Australian financial services licensee (AFSL 233209).

The company includes the following 'corporate authorised representatives', who we've authorised to provide wealth advice under our licence.

- Modoras Wealth Management (QLD) Pty Ltd  
ABN 66 623 115 668
- Modoras Wealth Management (VIC) Pty Ltd  
ACN 145 368 869  
The trustee for Modoras Wealth Management (VIC) Unit Trust  
ABN 27 236 614 176
- Modoras Wealth Management (SYD) Pty Ltd  
ABN 82 622 475 478
- FinancialLine UMG Pty Ltd ATF  
The Pyramid Unit Trust  
ABN 24 741 319 784
- RJS Wealth Management Pty Ltd  
ABN 24 156 207 126

Modoras Pty Ltd also trades as **Modoras Asset Management** (MAM) (ABN 86 068 034 908). MAM is the specialist investment management division of Modoras. It provides Modoras clients and other investors with exclusive financial, capital market and investment analysis; portfolio design and construction; and portfolio management services.

**Actocue Pty Ltd** (ABN 32 128 604 419) is an Australian financial services licensee (AFSL 323729).

**Enevia Pty Ltd** (ABN 40 128 973 464) is an Australian financial services licensee (AFSL 321254).

## Accounting, tax and audits

Accounting, tax and business advice and services are offered through the following tax agents and accounting companies:

- Modoras Accounting (QLD) Pty Ltd  
ABN 81 601 145 215
- Modoras Accounting (Gold Coast) Pty Ltd  
ABN 62 601 145 199
- Modoras Accounting (SYD) Pty Ltd  
ABN 18 622 475 521
- Modoras Accounting (VIC) Pty Ltd  
ACN 145 368 850  
The trustee for Modoras Accounting  
(VIC) Unit Trust  
ABN 37 460 720 728
- RJ Sanderson & Associates Pty Ltd  
ABN 71 060 299 783
- SDJ Audit Pty Ltd  
ABN 11 624 245 334
- Crispin & Jeffrey Pty Ltd  
ABN 97 668 120 170

## Credit assistance

The following companies are Australian credit licenses (ACL):

- Modoras Pty Ltd  
ABN 86 068 034 908  
ACL 233209
- FinancialLine Finance Pty Ltd  
ATF FinancialLine Finance Trust  
ABN 11 644 724 780  
ACL 392126
- RJS Loan Solutions Pty Ltd  
ABN 25 123 033 116  
ACL 393942
- Actocue Pty Ltd  
ABN 32 128 604 419  
ACL 323729

## Other services and related entities

- FinancialLine Pty Ltd  
ABN 28 104 193 857  
(Technology services)

**Banks Group Wealth Management Pty Ltd** (ABN 14 127 520 558) is an Australian financial services licensee (AFSL 496348). The following 'corporate authorised representatives' are authorised to provide wealth advice under the licence. They in turn have sub-authorised individuals (directors and/or employees) to provide advice, service and assistance on the licensee's behalf.

- BG Private Clients Pty Ltd  
ABN 72 621 816 466

## Our relationships and associations

It's important for you to be aware of Modoras's relationships and associations with other parties for completeness, confirming no benefits are received by Modoras or its advisers for these arrangements.

These relationships and associations are as follows:

- Peter Sarai is a shareholder and / or director of all companies and related business entities Modoras owns either wholly or partially.
- Modoras Pty Ltd, trading as Modoras Asset Management (MAM), sponsors the Modoras Asset Management Investment Series (MAMIS).
- MAMIS is an offering of managed investment portfolios. We've appointed investment managers to design, build, implement and manage these tailored portfolios on our behalf.
- Modoras Pty Ltd is associated with Enevida Pty Ltd (ABN 40 128 973 464, AFSL 321254). Enevida has been established as an AFS licensee for the sponsorship of a badged 'white label', Investor Directed Portfolio Service (IDPS). IDPS comprises the Enevida Platinum Portfolio Investment Solution (EPPIS) and Enevida Platinum Retirement Management Solution (EPRMS) wrap platforms (or wrap accounts). Modoras's representatives are authorised to provide advice in relation to and deal in these platforms.



## How to make a complaint

If you're one of our financial planning or credit-assistance clients and you're unhappy with any aspect of our relationship with you, you can make a complaint. As a first step, we encourage you to speak directly to one of our team members. You can assist us with your complaint by providing us with as much supporting information as possible and telling us what your desired outcome is. We'll promptly acknowledge your complaint and, if possible, resolve it immediately. If we can't, we'll investigate the matter further before giving you a decision. If you're unhappy with our decision, you can access the external dispute resolution scheme run by the Australian Financial Complaints Authority. Our complaints policy can also be found at <https://modoras.com/complaints-policy-afsl/>

### Australian Financial Complaints Authority

GPO Box 3  
Melbourne VIC 3001  
[www.afca.org.au](http://www.afca.org.au)  
[info@afca.org.au](mailto:info@afca.org.au)  
1800 931 678

If your complaint relates to privacy (i.e. the way we've handled your personal information), please contact:

### Office of the Australian Information Commissioner (OAIC)

GPO Box 5288  
Sydney NSW 2001  
[www.oaic.gov.au](http://www.oaic.gov.au)  
[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
1300 363 992







## Our professional indemnity insurance

Our professional indemnity insurance satisfies the compensation arrangements required under Australian law, namely section 912B of the Corporations Act. Modoras maintains appropriate cover for claims in relation to services provided by Modoras's authorised representatives (i.e. financial planners), credit representatives and employees — regardless of whether they still work for Modoras.

## Your privacy

The privacy of your personal information is important to us. We collect your personal information to ensure we're able to provide you with the financial, credit and tax advice, services and products you need to achieve your goals. To see our privacy policy, visit [www.modoras.com/privacy](http://www.modoras.com/privacy). You can also request a copy of our policy at any of our offices.

## More information

For more information about this FSCG — Part A, please contact our compliance officer:

[compliance@modoras.com](mailto:compliance@modoras.com)

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# MODORAS

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