



# Financial Services Guide

FSG version 1.21 (08.02.2024)





**This Financial Services Guide (FSG) is an important document that we are required to give you as a provider of financial services. The purpose of this FSG is to inform you of certain matters relating to our relationship, prior to providing you with a financial service.**

The matters covered in this FSG include:

- ✓ Who we are and our contact details
- ✓ What financial services we are authorised to provide
- ✓ What privacy provisions are in place
- ✓ How we (and any other relevant parties) are remunerated
- ✓ Details of any potential conflicts of interest
- ✓ Details of our internal and external dispute resolution procedures and how you can access them

### **Not Independent**

Oracle Advisory Group (Oracle) receives commission payment on Life Insurance Products.

This allows us to advise and place your insurance without charging you, the client, directly but rather receiving remuneration from product issuers. By doing this we are not allowed to use the words independent, impartial or unbiased when describing our business.

For more information on this please ask your adviser.

## Privacy Statement

We understand that privacy is important to you. Oracle Advisory Group is committed to protecting your privacy. This Privacy Statement relates to the collection and use of personal information you may provide to us.

Personal information is any information that can identify you. This may include sensitive information such as your name, contact details, date of birth, health details, financial details, and tax file number. We may ask for sensitive information where it is required by law or where the information is needed to enable us to provide you with the financial products or services you need. In either case, we may collect such information incidentally. By providing us with sensitive personal information, you consent to us using the information subject to applicable laws.

In this statement, "we", "our", and "us" refers to Oracle Advisory Group as a company. You may also provide approval (at request) to share your personal information to its related companies (Oracle Investment Management Pty Ltd, Oracle Lending, and Oracle Accounting (Australia) Pty Ltd where required).

The following information provides an overview of how we will protect your privacy.

### Collection of personal information

We may collect and hold personal information about you, information you provide to us, including fact find forms or when you speak directly with our staff.

We will not collect any personal information about you except where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us (for example your accountant, product issuer or employer).

Please note that if we collect personal information electronically, we may do so by using "cookies". A cookie is a packet of information which is sent by our website to your computer to track your use of our website and to allow you to effectively access your account information. This information is collected for security purposes and to protect the integrity of your account details.

### Use and disclosure of personal information

Your personal information is used only for the purpose for which it is collected, and that is for the purpose of providing you with the financial products and/or services you have requested, or for other purposes such as:

- Notify you about our other services and marketing activities from time-to-time; and
- Manage our relationship with you.

We will not disclose your personal information unless the disclosure:

- is required or authorised by law; (such as to the Australian Taxation Office)
- has your consent (express or implied);
- is to product providers you were placed in by an Oracle Advisory Group Financial Adviser;
- is to financial planners, brokers and those who are authorised by us to review our clients' needs and circumstances from time-to-time;
- is to other entities within the Oracle Advisory Group, but only if this is necessary in order for us to provide you with services; or
- is to organisations with whom we have a business relationship that have strict confidentiality rules. You agree that not all recipients of your personal information may have privacy policies similar to ours and you consent to the disclosure of your personal information for those purposes.

### Access to your personal information

You can request us to provide you with access to personal information we hold about you. We may allow you to inspect your personal information in person or provide you with copies or a summary of relevant documents, depending on what we consider most appropriate in the circumstances. Any charge we make for providing access will be reasonable.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If you wish to access your personal information, you should contact us through our offices.

Please note that we need not provide access to personal information if the request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, or give rise to a breach of the law. If we refuse access, we will provide you with reasons for doing so.

A copy of Oracle's Privacy Policy can be obtained at:

<https://oracleag.com.au/privacy-policy/>

### Problems or questions

If you have any further queries relating to our privacy statement, or believe that we have mishandled your personal information, in turn, breaching the Australian Privacy Principles, you may lodge a complaint with us. The complaint, addressed to the Privacy Officer, must be in writing in accordance with the Privacy Act 1988.

You can contact us by email at [info@oracleag.com](mailto:info@oracleag.com) or as detailed below:

Privacy Officer  
Oracle Advisory Group Pty Ltd  
Suite1, Level 2, 240-244 Pacific Highway,  
Charlestown NSW 2290  
p. 02 4088 6444

From receipt of your written complaint, the Privacy Officer has up to 30 days to respond. If the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Information Commissioner. You can lodge a written complaint with the Information Commissioner by:

Submitting an online form through the Information Commissioner's website: [www.oaic.gov.au](http://www.oaic.gov.au)

- Fax to 02 6123 5145
- Mail GPO Box 5288 Sydney NSW 2001

### Further privacy information

For more information about privacy issues in Australia and protecting your privacy, visit the Office of the Australian Information Commissioner's website at [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy).



## **It is intended that this FSG should assist you in determining whether to use any of our financial services. If you choose to use any of our products or services, you may also receive other documents that may include:**

### Statement of Advice

Whenever we provide you with advice which takes into account your objectives, needs and financial situation, you are entitled to receive a Statement of Advice (SoA).

The SoA will contain the advice, the basis on which the advice has been given and other information relating to fees, commissions and factors which may have influenced the provision of the advice.

### Further Advice

Your Financial Adviser may provide further advice to you in writing or verbally which continues advice provided to you in a previous Statement of Advice (SOA).

Should you require a copy of that further advice, you can request the record of the advice by contacting us by mail, phone or email within 7 years of the date your Financial Adviser gave the further advice to you.

### Product Disclosure Statements

Whenever we give you advice about the acquisition of a particular financial product (other than securities) or offer to arrange the issue of a financial product, we must provide you with a Product Disclosure Statement (PDS) relating to that particular financial product.

The PDS contains important information that is necessary for you to make an educated and informed decision.

With your agreement, PDS documents may be provided to you electronically via email, CD, client portal access or website link.

### Oracle's Investment Philosophy

Oracle's investment philosophy focuses on growing the value of your investments in a time critical manner together with providing an ongoing income stream. We envisage that this will result in better performance outcomes over time and should negate any additional platform or investment management costs. Oracle model portfolios are actively managed and provide online portfolio viewing and reporting.

Oracle utilises a Warren Buffett style of investment strategy and wish to buy companies with:

- High return on equity
- Low debt
- Long history of earnings per share growth
- Involvement in an industry with tailwinds supporting them and not experiencing headwinds
- Consumer monopoly and not commodity style businesses
- Trade prices at reasonable valuations

We believe that by investing in companies that fit the above criteria, that we will outperform the market and provide superior returns to clients, as Warren Buffett has provided to shareholders in Berkshire Hathaway.

Additionally, the Oracle Property Securities portfolio has a distinct investment philosophy which we also believe should provide superior returns over the medium to long term.

Oracle specifically seeks to underweight property companies that focus on

- Office accommodation (due to the shift to working from home, which we believe will reduce the demand and pricing of office accommodation)
- Retail shopping centres (due to the move away from shopping in physical stores and the ongoing move to purchasing online)

Conversely, we seek to overweight companies that focus on

- Distribution centres (due to purchasing goods online)
- Childcare centres (demand continues to rise)
- Hotels (continue to experience significant revenue growth)

The Oracle Fixed Interest Fund has a flexible mandate that allows us to implement a range of strategies that can be implemented in varying economic conditions. This is in stark contrast to many fixed interest fund managers that have strict mandates that have produced satisfactory results during an extended period of falling interest rates but may not produce satisfactory results in a rising interest rate environment.

Oracle strategy is materially different from many fixed interest alternatives as we focus on owning fixed interest investments that

- Provide variable rate interest payments (as these bonds will benefit from a rising interest rate environment)
- Pay a relatively high interest rate
- Offer a higher interest rate than comparable securities, which we believe are likely to cause the purchased bond to increase in value as well as providing a superior interest payment.

We seek to underweight securities that provide a fixed interest payment as we believe that fixed rate securities will provide inferior returns in a potentially rising interest rate environment.

We believe that by utilising the above investment strategies should provide superior investment returns to clients over the medium to long term.

### How Oracle will give Advice

You may be provided with some investment options in line with the Oracle Investment Philosophy. The Oracle Investment Philosophy (as mentioned above) uses an investment process and research to identify superior businesses at reasonable prices and constructs portfolios with regard to adequate diversification and an appropriate split between a range of asset classes. This strategy has been built up over the past 35 years.

Oracle's advice may involve recommending their own model portfolios, and we will ensure that the advice is appropriate to your individual investment objectives, financial situation and particular needs.

It is up to you to decide whether our approach is appropriate to you and to choose the options that best suit you. You do not have to follow our investment approach if it does not suit you and, if you wish make alternate investments, your Oracle adviser will follow your instructions. In this way, you will have access to a professional fund manager's investment strategy on stock selection and portfolio construction.





# A guide to our relationship with you and others

## Who is my adviser?

Your Financial Adviser is a representative of Oracle Advisory Group Pty Ltd as trustee for Oracle Advisory Group Unit Trust (Oracle).

If you do not wish to obtain advice, you face the risk that the financial product/s you select will not fully take into account your objectives, or financial situation.

If you do not wish to receive our advice, we may deal on your behalf by carrying out your instructions under an execution only transaction (please refer to your Financial Adviser for further detail).

## Who is responsible for the financial services provided?

Oracle is an authorised representative of Oracle Advisory Group ABN 71 617 787 176 who is the holder of an Australian Financial Services Pty Ltd Licence No. 540806 and is responsible for the advice and all financial services provided. Oracle is also responsible for the distribution of this FSG.

## Do you have any relationships or associations with Financial Product issuers?

Oracle Advisory Group Pty Ltd and Oracle Investment Management Pty Ltd have common directorship and ownership.

Oracle Investment Management is a licensed boutique financial services business (AFSL 430574). Oracle Investment Management provides portfolio advice and dealing services to retail and wholesale clients. Oracle Advisory Group Pty Ltd (Oracle Advisory Group) is a separate legal entity and is authorised under the Oracle Advisory Group Pty Ltd Financial Services Licence (AFSL 540806) to provide financial advisory activities.

Investment in various investment funds or portfolios managed by Oracle Investment Management is available via the Oracle Managed Accounts Series II facility, a registered Managed Investments Scheme (MIS). The Responsible Entity is The Trust Company (RE Services) Limited (Perpetual), and platform administration is conducted by HUB24.

Where we feel it is the most appropriate solution for you, taking into account your individual investment objectives, financial situation and particular needs, your Oracle adviser may recommend the use of their own model portfolios.

## How are any commissions, fees or other benefits calculated for providing the financial services?

Our Financial Advisers have a different fee level for personal financial advisory services and are able to provide an individual quote of any fees payable to us following the completion of your Fact Find.

Your Financial Adviser will disclose to you in writing in the SoA what fees we may charge you, when you have to pay, and what payments we may receive from the financial product issuer/s.

### Statement of Advice (SoA)

Our advice normally entails a discussion about your financial needs, concerns, objectives and strategy options with your adviser. After this meeting, a written SoA is prepared and will be presented to you at a subsequent meeting. The fee levied for this process and for the production of the SoA is typically between \$1,650 - \$4,400, however depending on the complexity of your financial situation and personal requirements the fee may be up to \$20,000.

### Implementation Fee

Upon implementation of our recommendation/s (under your authority to proceed), an adviser fee may be paid to us ranging from \$0 to \$10,000 as a fixed dollar fee, or between 0% and 4.4% as a percentage of funds invested (both inclusive of GST). For example on a \$10,000 investment at 2.5% this fee would be \$250.

### Fees for Ongoing Services

We may also charge you an annual adviser fee for ongoing services we provide to you. On investment products this fee typically ranges between \$0 to \$20,000 per annum as a fixed dollar fee, or between 0% and 1.65% per annum as a percentage of funds invested (both inclusive of GST). As an example, on an investment of \$10,000 at 1.10% the ongoing adviser fee would be \$110 per annum.

### Fees for Adhoc Services

For services outside of the Ongoing Services (noted above), is known as Ad-hoc advice. This service provides clients an opportunity to engage our services should the need arise (i.e. your circumstances change). Our adhoc services are based on an hourly basis and all fees are inclusive of GST.

As an example, our current ad-hoc advice fee ranges up to \$550 per hour determined by the complexity of the advice required and the knowledge and experience of your Financial Adviser.

We complete an Engagement Letter for each advice, so you know what you are paying for.

### Insurance Products

Where we recommend insurance products, the life insurance company can pay us an initial commission and ongoing commission.

Typically an initial commission can be up to 66% of the annual premium and an ongoing commission of up to 22% of the annual premium. For example, if the first year's premium is \$500 and we are paid 66% of that premium, we receive \$330. If the premium for the second and subsequent years is \$500 and we are paid 22% of that premium, we receive \$110 per annum.

### Self Managed Superannuation Fund (SMSF)

If you establish and maintain a SMSF with us, you may be charged an initial establishment fee from \$2,500 (inclusive of GST). If you choose Oracle to do your SMSF annual administration, taxation and compliance work there is an annual fee from \$3,000 (inclusive of GST) and an additional fee from \$600.00 (inclusive of GST) per Property.

Please speak with your Oracle Adviser about your specific requirements.

The majority of our Financial Advisers are salaried employees who may be paid bonuses on a quarterly or annual basis. The level of this salary and bonus is dependent upon the experience and performance of the Financial Adviser. For a non-salaried employee they are paid 100% of all client's fees and commissions and pay a fixed fee for Licensee services and service office facilities.

### Referral arrangements

If a third party refers you to our adviser the referrer may receive a referral fee, commission or non-monetary benefit. This is not an additional cost to you. All referral payments are disclosed in the Statement of Advice that is provided to you.

Oracle may pay a referral fee to a referral partner which may include an upfront of \$100 - \$500 and/or 0% - 30% of the initial and/or ongoing fees or commissions. Where a referral fee is paid, details will be provided to you in your advice document such as SoA or RoA.



## What kinds of financial services is Oracle authorised to provide me and what kinds of financial product/s do those services relate to?

Oracle is licensed to provide financial services and financial product advice, as authorised through Australian Financial Services Licence No. 540806.

A copy of this licence can be requested.

Oracle is authorised by ASIC to provide advice and deal in the following financial products:

- Basic and Non-basic Deposit Products
- Government stocks, bonds and debentures
- Life Risk Products (Life/Death, Income Protection, Trauma, Total & Permanent Disability)
- Life Investment Insurance Products
- Superannuation (including Self Managed Superannuation Funds)
- Retirement Savings Accounts
- Securities
- Managed Investments
- Margin Loans

## What information should I provide to receive personalised advice?

You need to provide us with a list of your personal objectives, details of your current financial situation and any relevant information, so that we can offer you the most appropriate advice possible.

You have the right not to tell us, if you do not wish to.

However, if you do not inform us of all your circumstances, the advice you receive may not be appropriate to your needs, objectives and financial situation.

You should read the warnings contained in the SoA carefully before making any decision relating to a financial product/s.

## Does Oracle have insurance cover?

Oracle has Professional Indemnity insurance in place as required by the Corporations Act which meets ASIC's requirements and provides cover for present and past representatives.

## What should I do if I have a complaint?

We are committed to providing a high standard of client service. If, for any reason, our level of service has failed to meet your expectations, we would like you to tell us.

Our dispute resolution process is designed to ensure that any concerns you may have are taken seriously and addressed justly and without delay.

If you have a complaint about the service provided to you, should take the following steps:

### 1. How to make a complaint

You can make a complaint to us by contacting your Adviser directly, or by contacting our Compliance Manager in any of the following ways:

Phone: 02 4088 6444

Email: [compliance@oracleag.com](mailto:compliance@oracleag.com)

Writing: PO Box 33 Charlestown NSW 2290

### When making your complaint please tell us:

- your name
  - how you wish us to contact you (for example, by phone, email)
  - what your complaint is about; and
  - what you are seeking to resolve your complaint
2. While we will endeavor to resolve your complaint in the shortest possible time we are required to finalise a complaint and provide a written response to you within 30 days of receipt of the written complaint.
3. If the complaint cannot be resolved to your satisfaction at the expiry of the 30 days, then you have the right to pursue the matter with an external complaints resolution body. Oracle is a member of the Australian Financial Complaints Authority.

### You can contact AFCA using the following details:

Email: [info@afca.org.au](mailto:info@afca.org.au)

Phone: 1800 931 678 (or +61 1800 931678 if calling from overseas)

Online: [www.afca.org.au](http://www.afca.org.au)

Mail: GPO Box 3, Melbourne, VIC, 3001

Refer to [Public Complaints Policy](#) for further details, or request a copy from your Financial Adviser.

## Any further questions?

If you have any further questions about our services, please contact your Financial Adviser.

Retain this document for your reference and for any future dealings with your Financial Adviser or Oracle.



P 02 4088 6444

E [info@oracleag.com](mailto:info@oracleag.com)

PO Box 33 (Lvl 2, 240-244 Pacific Highway) Charlestown NSW 2290

[oracleag.com.au](http://oracleag.com.au)