

Colonial First State Custom Solutions Financial Services Guide – Custody services

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What is a Financial Services Guide (FSG)?

This FSG is an important document Avanteos Investments Limited (AIL, we, our or us) is required to give you under our AFSL. It provides you with information about AIL and covers:

- who we are and how we can be contacted
- what services and types of products we are authorised to provide to you under our AFSL
- how we (and any other relevant parties) are remunerated
- how we handle your personal information
- how complaints are dealt with.

The FSG has been prepared by us and may be updated from time to time.

Who are we?

Colonial First State Custom Solutions is the registered business name of AIL. AIL was established in 2001 and is a specialist provider of services, technology and systems underpinning superannuation and pension wrap products, IDPS and IDPS-like products.

AIL is ultimately a subsidiary of Commonwealth Bank of Australia ABN 48 123 123 124. Commonwealth Bank of Australia and its subsidiaries (including the Colonial First State Group¹) do not guarantee the performance or the repayment of capital by AIL. Investments in AIL are not deposits or other liabilities of Commonwealth Bank of Australia or its subsidiaries, and are investment-type products subject to investment risk, including possible delay in repayment, and loss of income and capital invested.

What financial services and financial products do we offer?

We are authorised under our Australian Financial Services Licence to provide the following financial services to retail and wholesale clients:

- deal on behalf of our clients in securities, warrants, interests in managed investment schemes, superannuation and deposit products and debentures, stocks or bonds
- operate custodial or depository services (together referred to as 'Custody Services').

Because we offer a number of services, the product you have elected will determine how we have been engaged for the purpose of providing the Custody Services to you. The Custody Services for which we are responsible are distinct from the services for which the Operating Entity is responsible, as set out in the following table.

Product Groups	Who engaged our service – Operating Entity	Disclosure documents outline important information about the product. You will need to have:
Superannuation and pension product	Trustee	Read the Product Disclosure Statement and signed the application form
IDPS	Operator	Read the IDPS Guide and signed the application form
IDPS-like	Responsible	Read the Product

Scheme	Entity	Disclosure Statement and signed the application form
Managed Investment Scheme	Responsible Entity	Read the Product Disclosure Statement and signed the application form And/or Read the IDPS Guide and signed the application form
Managed Discretionary Account	MDA Operator	Read and signed the MDS Contract

Who is responsible for the custody services provided to you?

We are responsible to you for the Custody Services we provide in connection with your investment.

We are responsible for:

- ensuring that we, or any sub-custodian appointed by us, holds investments provided to it from time to time in trust for you. Your investments may not be required to be held separately from the assets of AIL or other investors provided we perform regular reconciliation procedures in relation to them.
- conducting transactions in relation to your investments in accordance with instructions from your adviser, financial planner, MDA Operator or portfolio manager (if applicable).

AIL does not provide you with any advice in connection with investments in the superannuation and pension product, IDPS, IDPS-like scheme or MDA.

You may also receive other documents from your adviser, financial planner, MDA Operator or portfolio manager (if applicable).

How are we remunerated for the services we provide?

AIL receives fees from the product provider for the Custody Services it provides to you. These fees are not an additional charge to you, but a portion of the fees that are outlined in the relevant PDS, IDPS Guide or Custody Terms and Conditions. AIL may also receive from the product provider transaction fees per transaction.

You may request particulars of fees directly charged to you by contacting the product provider.

As Custodian, AIL is entitled to remuneration from

Authorised Deposit Taking Institutions (ADI) that provide the pooled cash account service, term deposits and other fixed interest investments. The remuneration is a percentage of the total amount deposited with the ADI. You can request further information about these arrangements before joining the superannuation fund, IDPS or IDPS-like scheme by contacting us on 1800 113 116.

Investment Managers and product issuers may be charged annual maintenance levies by us. The annual maintenance levies paid by the investment manager or product issuer are not additional fees charged to you.

Companies related to us may also receive:

- fees and charges as the investment manager/responsible entity for investment funds offered through the superannuation fund, IDPS, IDPS-like scheme or MDA. This depends on the type of investments made
- fees and charges associated with cash and fixed interest investments offered
- interest costs, fees and commissions associated with the margin lending facility that may be available through the IDPS or IDPS-like scheme
- payment for administration, management, information technology and other services provided to us
- brokerage and custodial fees associated with the product
- insurance premiums for insurance benefits provided.

How can you transact with us?

When you invest, you authorise us to act on instructions from your adviser, financial planner, MDA Operator or portfolio manager (if applicable) and you acknowledge that you may not give us instructions directly except to withdraw, appoint a new adviser or update your details. Any notices that you wish to give to us in relation to your investments in your superannuation fund, IDPS or IDPS-like scheme must be given in writing to your adviser, financial planner or portfolio manager (if applicable) for on-forwarding to us. If you have enquiries in relation to the operation of your superannuation fund, IDPS or IDPS-like scheme, including the Custody Services we provide, please contact the product provider.

What kind of compensation arrangements are in place for a breach of our legal obligations?

Where we are liable to meet a claim, payment will generally be paid from our cash flows and available resources.

We hold professional indemnity insurances. These insurances are between us and the insurer and are intended to respond to civil liability resulting from significant claims for compensation made against us for financial services provided by us or our representatives. These insurances provide cover even if one of our representatives has ceased to act or work for us.

Our compensation arrangements comply with the legal requirements set out in section 912B of the Corporations Act.²

Privacy information

How is your personal information dealt with?

The privacy of your personal information is important to us. Colonial First State Custom Solutions is part of the Commonwealth Bank Group of companies ('the Group'), a well-known financial services organisation and we adopt the Group's privacy policy which is accessible at commbank.com.au.

Collecting information

'Customer information' is information about a customer. It includes personal information such as name, age, gender and contact details as well as your health and financial information, but it may vary depending on the type of customer you are (for example a Trust or company).

The law may require us to identify our customers. We do this by collecting and verifying information about you. We may disclose your customer information in carrying out verification, eg we may refer to public records to verify information and documentation, or we may verify with your adviser that the information you have given us is accurate.

You must provide us with accurate and complete information. If you do not, you may be in breach of the law and also we may not be able to provide you with products and services that best suit your needs.

How do we use your personal information?

We collect, use and exchange your personal information so that we can:

- establish your identity and assess applications for products and services administered by us
- administer products and services
- manage our risks and help identify and investigate illegal activity, such as fraud
- contact you, for example, if we need to tell you something important
- conduct and improve our businesses and improve the customer experience, or
- comply with our legal obligations and assist government and law enforcement agencies or domestic and foreign regulators.

We may also collect, use and exchange your information in other ways where permitted by law.

Protecting your personal information

We comply with the Australian Privacy Principles as incorporated into the Privacy Act 1988 (Cth).

The Privacy Act protects your sensitive information, such as health information. When we need to obtain this type of information, we will ask for your consent, except where otherwise permitted by law.

Who do we exchange your personal information with?

We exchange your personal information with other members of the Group, in order to provide you with financial services and to meet our legal obligations. We may also exchange your information with third parties where this is permitted by law or for any of the purposes mentioned under 'How do we use your personal information?' above.

These third parties include:

- service providers or those to whom we outsource certain functions, for example, statement production and information technology support
- brokers and agents who refer your business to us
- any person acting on your behalf or authorised by you to have access to your account information, including your financial adviser, solicitor, accountant, executor, administrator, trustee, operator, portfolio manager, responsible entity, guardian or attorney
- the insurer to enable it to assess your insurance application and to provide and administer cover
- claims-related providers, such as assessors and investigators, who help us with claims
- auditors
- government and law enforcement agencies or domestic and foreign regulators, or
- entities established to help identify illegal activities and prevent fraud.

In all circumstances where our contractors and outsourced service providers become aware of customer information, confidentiality arrangements apply.

We may be required to disclose customer information by law, eg under Court Orders or Statutory Notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter- terrorism financing.

Sending information overseas

From time to time we may send your personal information overseas, including to overseas Group members and to service providers or other third parties who operate or hold data outside Australia. Where we do this, we make sure that appropriate data handling and security arrangements are in place. Please note that Australian law may not apply to some of these entities.

We may also send information overseas to complete a particular transaction or where this is required by laws and regulations of Australia or another country.

For more information about which countries your information may be sent to, see the Commonwealth Bank Group privacy policy available at commbank.com.au.

Additional obligations

The Commonwealth Bank Group may be subject to laws or regulations in Australia or another country that affect your relationship with the Group (eg laws that address tax evasion). So that we may comply with our obligations under these laws or regulations, we may:

- require you to provide information about you or your product
- if required to do so, withhold an amount from a payment to you, and if we do, we will not reimburse you for the amount withheld, and/or
- take such other action as is reasonably required, including, for example, closing your account.

Viewing your information

You can (subject to permitted exceptions) request access to your personal information and seek the correction of such information by contacting the Privacy Officer:

Privacy Officer AIL
Locked Bag 3460
GPO Melbourne VIC 3001

Telephone: 1800 113 116
Facsimile: 03 9804 0398

Email:
privacyofficer@colonialfirststate.com.au

We may charge you for providing access. For more information about our privacy and information handling practices, please refer to the Commonwealth Bank Group Privacy Policy, which is available through commbank.com.au or you can contact us on 1800 113 116.

Making a privacy complaint

If you have a concern about your privacy, you have a right to make a complaint.

To lodge a privacy complaint, you can contact us on 1800 113 116 or complaints@colonialfirststate.com.au.

We acknowledge every complaint we receive and provide the name, a reference number and contact details of the investigating officer.

Usually, it takes only a few days to resolve a complaint. However, if we are unable to provide a final response within 45 days (or 90 days for superannuation complaints), we will contact you to explain why and discuss a timeframe to resolve the complaint.

For more information about our privacy and information handling practices, please refer to the Commonwealth Bank Group Privacy Policy, which is available through commbank.com.au or you can contact us on 1800 113 116.

What should you do if you have a complaint?

If you have a complaint about the service provided to you, you should contact us about your complaint on 1800 113 116 or write to:

Customer Liaison Officer
AIL Locked Bag 3460
GPO Melbourne VIC 3001

Email: complaints@colonialfirststate.com.au

When you make a complaint to us, we will do everything that we can to understand, investigate and resolve the issue. If you are not happy with the handling or outcome of your enquiry or complaint, you have the option of contacting the Financial Ombudsman Service (FOS). FOS can advise you if it can help. To allow FOS to easily identify us, please quote our code number 11084.

FOS can be contacted at the following address:

The Manager
Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001

Telephone: 1300 780 808
Email: info@fos.org.au

