



### **Acumen Investors Pty Ltd ('Acumen Investors')** **Australian Financial Services Licence ('AFSL') Number 526 972**



Date: 1 October 2023 Version 3.0

This Financial Services Guide ('FSG') is provided by Acumen Investors Pty Ltd (ABN 58 638 480 118 / AFSL 526 972), trading as Acumen Investors ('we', 'us' or 'our'). Acumen Investors holds the Australian Financial Service License (AFSL) for providing personal advice and operates through Acumen Money and a network of Advisers.

This FSG informs retail clients on who we are and the financial services and products our network of Advisers offer under Acumen Investors' AFSL. It contains information about the types of remuneration which may be payable to Acumen Investors and related entities for the services provided to you and describes how complaints about Acumen Investors are handled. This FSG is designed to assist you in deciding whether to use our financial services.

#### **Non-Aligned but not independent**

*Acumen Investors is privately owned and is not aligned with any financial institutions. We are not obliged to sell or advise on any specific brand of financial product.*

*Acumen Investors and its network of Advisers are not able to refer to ourselves as 'independent', 'impartial' or 'unbiased' as we may receive monetary benefits in relation to the provision of personal advice to retail clients. Advisers have a duty to act in your best interests and our disclosure of lack of independence does not compromise our Advisers in providing you with appropriate advice.*

#### **SERVICES ACUMEN INVESTORS PROVIDE:**

Acumen Investors' AFSL authorises it to provide financial product advice in the following classes and deal in the following financial products:

- Deposit and payment products limited to:
    - basic deposit products
    - deposit products other than basic deposit products;
  - Derivatives;
  - Debentures, stocks or bonds issued or proposed to be issued by a government;
  - Interests in managed investment schemes including investor directed portfolio services;
  - Investment life and life risk insurance products
  - Retirement Savings Accounts;
  - Securities;
  - Standard margin lending facilities; and
  - Superannuation;
- to retail and wholesale Investors.



**For all general enquiries, contact your Adviser or our Sydney Office  
for assistance**

## **ABOUT US**

Acumen Investors is authorised under section 913B of the Corporations Act 2001 to provide financial services to retail and wholesale investors. These financial services are provided under AFSL 526 972 and are listed in Sections I and II below.

## **ABOUT OUR ADVISERS AND NETWORK**

Acumen Money is a Corporate Authorised Representative of Acumen Investors. Its Advisers and Advisers under Acumen Investors are authorised to provide financial services and product advice in relation to, and deal in, certain financial products and services. Acumen Investors will be responsible for any financial services that your Adviser is authorised to provide to you.

Your Adviser's education and qualification, the Professional Associations they maintain, types of advice they can provide and their authorisations, the fees they charge and how they are paid are contained in the Adviser Profile.

## **I. FULL PERSONAL ADVICE**

Our vision is in the provision of quality advice at fair prices, to everyone. Personal advice is where your Adviser takes into consideration your personal objectives, financial situation and needs in the advice. Our Advisers aim to understand your personal goals, including challenges and work together with you towards achieving your wealth plans through personalised financial and investment plans. We aim to assist you as you journey towards different phases in life and are ready to review your plans when your life goals change.

The types of personal advice we provide include; cashflow and budgeting, wealth creation and investment, strategies on gearing, superannuation planning and strategies, SMSF establishment, on-going maintenance and investments, retirement and pre-retirement planning, personal and business insurance, salary sacrifice/packageing, estate planning, aged care and Centrelink advice.

The fees charged for our advice and services may be based on:

- a flat fee which is generally a minimum of AUD\$5,000 excluding GST; or
- a percentage-based fee on assets managed up to a maximum of 2%; or
- a combination of the two

as agreed between you and your Adviser.

Our advice fee include the Initial advice which covers the research and preparation of your unique financial plan; Advice Implementation which covers the administrative time in implementing the recommended strategies and products and may include Ongoing advice which is the cost of reviewing your financial plans. Details of these fees are disclosed in your Statement of Advice ('SOA').

## **II. FINANCIAL PRODUCTS AND FEES**

Our Advisers can arrange the following products and services:

### **A. ASX AND INTERNATIONAL DIRECT SECURITIES**

Acumen Investors offer investments in direct securities on the ASX and international securities. Investments can be made via Managed Accounts (on various mandates) via major platforms, direct ASX CHESS sponsored portfolios, international direct securities or with any combinations.

Acumen Investors has entered into arrangements with various brokers to trade, settle and clear transactions and as custodians on trades executed by Advisers of Acumen Investors. These providers may change without notice to clients and currently include Morrison Securities Pty Limited ABN 50 001 430 342 / AFSL No. 241737, Third Party Platform Pty Limited ABN 74 121 227 905 / AFSL 314341 and Interactive Brokers Australia Pty Ltd ABN 98 166 929 568 / AFSL 453554. Acumen Investors may engage the services of other providers to fulfil its business needs as required.

Brokerage is charged as a percentage of the total consideration when buying or selling shares or derivatives. Brokerage rates are subject to negotiation between the client and the

Adviser, and will depend on the type and service required, whether it is via Models or stand-alone customised portfolios, including the size and frequency of transactions and the Exchange it is traded on. The brokerage rate may be applicable to all transactions, or a rate may be applied to a single transaction.

Brokerage rate charges in home currencies can range up to 1.50% for all ASX(AUD)/International Equity(USD), Warrant and Exchange Traded Option ('ETO's) transactions depending on the agreed brokerage rate between the Client and the Adviser and the complexity of the trades. Unless agreed otherwise, the standard Default Brokerage Rate is 1.00% per contract/confirmation note with a minimum charge of \$100 excluding GST for stand-alone customised Portfolios and securities transactions or a minimum charge of \$50 or 0.5% whichever is greater excluding GST for investing via Models. Fees are charged based on home currencies of the Exchange unless advised otherwise. Default fees are subject to change and may be different from what your Adviser has stipulated in your application form. Please confirm your fee scale with your Adviser before executing the first transaction.

### Miscellaneous Fees and Charges

In regards to trading in ASX securities, a number of fees and charges may be charged and are subject to discussion between you and your Adviser. These are set out in the table below (excl. GST) and may be changed by respective providers without notice to you;

Fail Fee (Buy and Sell Transaction), ETO including margin calls - \$100.00 per day up to a maximum of \$1100 per day	Bank Dishonour Fee - \$75
Off Market Transfers - \$100	Late payment fee - Buys and Sells \$50.00 plus Interest
Exercise and Assignments - \$1	SRN Requests - \$25

For international securities trading, costs and charges vary according to exchanges. Some of these charges are pass through to clients' individual accounts. Acumen Investors reserves the right to pass through to clients' account any additional charges, administration fees or changes to existing charges that Acumen Investors may incur as a result of industry practices or through the course of normal business operations. You will be notified of any of these changes prior to their implementation.

### B. Portfolio Administration Services and Fees

Acumen Investors undertakes Portfolio Administration and Reporting Service for all clients' portfolios, unless expressly excluded by clients. The Administration and Reporting Service provides performance tracking, comprehensive and tax reporting for all portfolios.

The Portfolio Administration and Reporting Service fee excluding GST may be fixed or as a percentage of overall Portfolio value. Additional asset classes like ETOs, private equities, credits or bonds add complexity to reporting and are added to the basic fees as below:

Admin Fee for:	Model Portfolios	Customised Portfolios
<b>ASX securities</b>	Min: \$400/mth or \$4,800 p.a. excl. gst Max: \$800/mth or \$9,600 p.a. excl. gst	Min: \$950/mth or \$11,400 p.a. excl. gst, thereafter a % of Portfolio Value Max: individual negotiation with Adviser.
<b>International securities</b>	0.1% of portfolio excl. gst per month	1 % of Portfolio Value.
<b>Additional asset classes</b>	\$200 per class per month	\$350 per class per month, \$250 for subsequent classes

Fees and charges are subject to changes and the default above may vary according to Advisers or complexities of individual portfolios. Please discuss with your Adviser.

### **C. Margin Lending**

Acumen Investors has entered into intermediary agreements with several margin lenders, including Leveraged Equities. This service is provided to Wholesale Investors only and only to clients who meet our Advisers' assessment.

### **D. Managed Accounts/Separately Managed Accounts ('SMA's)**

Acumen Investors' Advisers can use the services of major next-gen investment platforms to meet clients' investment needs. These platforms provide aggregated online portfolio reporting, custodial and administration for investing across any entities including superannuation accounts, SMSFs and non-super accounts, all in one location. Speak with your adviser in choosing a platform that suits your needs.

Acumen Investors has arrangement with Netwealth Group to provide clients with institutionally managed ASX securities or Multi-Asset securities portfolios approved by Acumen Investors. Adviser fee charged is up to 1.5% p.a. of portfolio value, in addition to Model Manager fee, Custodian and Platform fee of not more than 1% p.a. of portfolio value. Acumen Investors reserves the right to charge a fee of up to 2% on initial contributions. A copy of the Product Disclosure Statement ('PDS') or Investor Directed Portfolio Service ('IDPS') guide is provided where relevant at the time of account opening, if not prior.

### **E. Other Services**

We provide other products or services like Cash Management Accounts provided by institutions like Macquarie Bank and ANZ. General information about the financial products including their terms and conditions, any significant risks associated with the products and information about the costs, fees and charges by the product providers will be included in their PDS. Other Services

### **F. Life Insurance Products**

A life insurance company or insurance broker may remunerate us when we arrange life risk insurance or investment life insurance products through that company or broker. As the remunerated amounts may vary, your adviser will give you details when advising you about such products and such remuneration will also be disclosed in the PDS or SOA provided to you.

## **DOCUMENTS YOU MAY RECEIVE**

Where we are required to issue you with a SOA in connection with personal advice, that document will provide details of the fees payable relative to that advice. In general, we must give you a SOA the first time we provide personal advice about any financial product.

If you hold an ongoing fee arrangement with us for a period of more than 12 months, we will provide you with an annual Fee Disclosure Statement and an Opt-in Renewal Notice, which allows you the option to continue working with us and renew our annual ongoing fee arrangement.

## **REMUNERATION AND BENEFITS**

The fee we charge clients is how Acumen Investors is directly remunerated. Acumen Investors may also receive benefits or remuneration from third parties such as product providers through commissions. Applicable fees and charges payable may change from time to time and are quoted exclusive of GST.

These remuneration may include:

- brokerage fees, portfolio administration and reporting fees, Adviser fees and Performance Fees (where applicable)
- initial and ongoing commissions paid to us by product and service providers, which may include certain IPOs, placements or new product fees, which range from 0.5% to 2% as set by the issuer or as stated in the PDS or Prospectus
- Where insurance policies are implemented, up to 66% of first year's premium of new policies as initial commission and up to 22% of ongoing commissions of the insurance premium each following year

### **Remuneration and benefits to Advisers**

Acumen Investors' Advisers are generally remunerated by commissions. The commissions entitled may be between 20% and 80% of commissions earned across all platforms and products advised and may be before sharing with co-Advisers.

### **PRIVACY**

Your privacy is important to us. Details of how we handle your personal information is disclosed on our Privacy Policy which is available on our website.

### **COMPENSATION**

We have compensation arrangements in place including a Professional Indemnity Insurance Cover which satisfies the requirements under section 912B of the Corporations Act and is adequate (within its terms and conditions) for the type of financial services we provide and for any potential liability arising from compensation claims.

### **COMPLAINTS**

If you have any complaints about our products or services, we have a complaint and resolution procedure that aims to deal with and resolve your complaint quickly and effectively. You should raise any complaints with your Adviser in the first instance. If you feel your complaint has not been resolved satisfactorily, please contact via the following methods, addressed to:

#### **The Compliance Manager**

Phone: +61 425 304 302 or Email to: [wchen@acumeninvestors.com.au](mailto:wchen@acumeninvestors.com.au) or In writing and send it to:

Acumen Investors  
PO Box 707 Chatswood NSW 2057

We will address and/or resolve your complaint within a reasonable amount of time.

If your complaint has not been resolved satisfactorily, you may refer the complaint to The Australian Financial Complaints Authority.

### **AFCA**

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

### **Our contact details are:**

Registered office: Level 6, 352 Kent Street, Sydney NSW 2000, Australia  
Website: <http://www.acumeninvestors.com.au>  
Telephone: +612 8005 1218  
Email: [contact@acumeninvestors.com.au](mailto:contact@acumeninvestors.com.au)

If you have any further questions about the financial services we provide, please contact our CEO, Wai-Yee Chen on +61 425 304 302 or [wchen@acumeninvestors.com.au](mailto:wchen@acumeninvestors.com.au)

