

FINANCIAL SERVICES GUIDE (FSG)

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About this Guide

This Financial Services Guide (FSG) provides you with important information about Fortnum Advice Pty Ltd (Fortnum Advice), the Principal Practice, and its Authorised Representatives (Advisers) who may provide you with the services described in this FSG.

This FSG consists of two parts, and both contain important information which must be read together. It's important that you take the time to read the information provided so that you can make an informed decision about whether to use the services offered by us.

If you need any clarification on what you have read, please don't hesitate to contact us. We are committed to having open and honest communication with you at all times, as this is the foundation of good advice and a successful ongoing relationship.

ABOUT US

Fortnum Advice Pty Ltd (Fortnum Advice), as an Australian Financial Services Licensee (AFSL), brings together many like-minded financial advisers who share a “client-first” approach.

Our name comes from a combination of two words – fortress and numbers. This represents our duty to you, the client – our dedication to protecting your financial security and our strength in numbers.

Fortnum Advice Pty Ltd is a wholly owned subsidiary of Entireti Limited (ABN 51 676 518 577).

How does Fortnum Advice maintain adviser standards?

Each Fortnum Advice Adviser is required to undertake continuous professional development. Fortnum Advice hosts regular training programs on areas such as legislative changes to the taxation, social security, superannuation and investment environments. Our education and training philosophy is one of continually raising the bar.

Each Fortnum Advice Adviser has direct access to technical, risk and investment research professionals who can provide additional analysis on strategy and products so that we can deliver quality advice to you. Risk management specialists monitor and regularly audit each Fortnum Advice Adviser to maintain high-quality advice standards.

Who is responsible for the advice to you?

Fortnum Advice is responsible for any financial advice or services your Adviser provides under our Australian Financial Services Licence (AFSL).

What financial services and products can Fortnum Advice provide?

Fortnum Advice is licensed to provide financial product advice and deal with the following products:

- Deposit and payment products.
- Debentures, stocks or bonds issued or proposed for issue by a government.
- Derivatives.
- Life investment or life risk products.
- Interests in managed investment schemes, including Investor Directed Portfolio Services (IDPS or ‘Wrap’).
- Managed Discretionary Account (MDA) Services.
- Retirement savings accounts.
- Superannuation (including Self-Managed Super Funds).
- Listed Securities.
- Standard margin lending facilities.

A wide range of financial products from various product providers are available and are thoroughly researched by qualified research professionals including, but not limited to, Mercer, Innova Asset Management, Zenith and Morningstar.

Your Adviser is only authorised to advise on products which are approved by Fortnum Advice for use. Your Adviser will only recommend a product to implement your strategy after considering its suitability in relation to your individual objectives, financial situation, and needs.

Lack of Independence

Fortnum Advice, its Principal Practices and its Advisers are not independent, impartial or unbiased due to the types of payments that are received by the group. This includes commissions paid by insurance providers or remuneration from a product issuer that is determined by the value of business placed. Payments received in this regard are all legal under Corporations Act 2001.

OUR ADVICE PROCESS

A comprehensive advice process is designed to ensure that the advice provided is suited to your needs and financial circumstances.



Important documents

You will receive a number of documents throughout the advice process and if you agree to enter into an ongoing review service. We will provide these documents as per your preferred method, electronically or paper based.

Statement of Advice (SOA)

Your Adviser will formulate a strategy to help achieve your needs and objectives and will put together any personal advice in a Statement of Advice (SOA). A SOA sets out the scope of the advice, your current personal and financial position, the basis for the advice and how it addresses your needs and objectives. It will also disclose the fees and charges payable by you and the remuneration and other benefits we may receive.

Record of Advice (ROA)

Where a further review is conducted or ad-hoc advice is requested from you and personal advice is provided, the advice may be provided via a new SOA or a Record of Advice (ROA) as applicable to the circumstances. Further advice may be in the form of a ROA where the further advice does not significantly differ from the original advice provided.

Statement of Transaction (SOT)

At times, you may wish to make changes without receiving advice. In these cases, we can take your instructions by telephone, email or in person (depending on type) and arrange for the transaction to be completed, without providing personal advice.

Once implemented, we will provide you with a Statement of Transaction (SOT), which confirms your instructions, informs you that no advice has been provided and discloses any fees and charges payable by you.

Product Disclosure Statement (PDS)

If your Adviser recommends a product as part of your financial strategy, they will provide you with the relevant Product Disclosure Statement (PDS). The purpose of a PDS is to assist you in making a decision about the particular financial product. It contains information about the product's key features, benefits, risks, and fees.

Ongoing Service Agreement (OSA)

If your Adviser recommends, and you enter into, an ongoing review service, for a period of more than 12 months, you will initially receive an Ongoing Service Agreement (OSA). This document outlines the agreed service and the fees applied over the specified period.

You will also receive an Annual Renewal Document (ARD) each following year. It will outline the estimated fees and services which will be provided to you in the upcoming 12 month period. The document will also ask you to confirm that you would like to continue the ongoing review service with your Adviser and consent to the deduction of any ongoing fees.

Client Service Contract

If your Adviser recommends, and you enter into, a service arrangement for a fixed period of 12 months or less, you will receive a Client Service Contract. This document outlines the agreed service and the fees applied over the specified period.

You will also receive a Confirmation of Fees and Services Letter at the end of the contract period which will outline the services you received, and fees paid.

OUR RELATIONSHIPS AND ASSOCIATIONS

Fortnum Private Wealth Ltd and Personal Financial Services Ltd

Fortnum Private Wealth Ltd and Personal Financial Services Ltd (PFS) are both also wholly owned subsidiaries of Entireti Limited. Fortnum Private Wealth Ltd and PFS both also respectively hold Australian Financial Services Licences that provide financial services to clients.

Fortnum Advice utilise the Managed Discretionary Account (MDA) Service licensed via arrangement with Fortnum Private Wealth Ltd.

Akumin Pty Ltd

Akumin Pty Ltd (Akumin) is a majority owned subsidiary of Entireti Limited. Akumin is a group that specialise in licensing and advice business services to financial planning practices. Some of the businesses within this group also respectively hold Australian Financial Services Licenses and Australian Credit Licences that provide financial services to clients.

Salita Portfolio Services Pty Ltd

Salita Portfolio Services Pty Ltd (Salita), a wholly owned subsidiary of Entireti Limited, provides portfolio construction and investment services to third party product issuers and receives fees for those services.

HOW WE ARE PAID

The remuneration and other benefits listed below generally cover what Fortnum Advice, your Adviser, the Principal Practice and any related parties may receive as a result of the services provided to you. Specific amounts and benefits can often only be calculated once the recommendations are made to you.

There are various ways that you may pay Fortnum Advice for the services provided to you, including:

- Fee for service - where you pay a fee for the services that we provide; or
- Commission (paid by product and service providers) in the form of initial (up-front) and/or ongoing (trail) commission; or
- A combination of commission and fee for service; or
- Other.

Each of these is discussed in further detail below.

All fees for services paid by you and/or commission paid by product and service providers are paid to Fortnum Advice. Fortnum Advice then distributes 100% of the fees received to its Principal Practices or distributes the fees after our Licensee fees and other expenses have been deducted.

Fee for service

In all instances, your Adviser will discuss the calculation of the fees when you meet and agree on the services to be provided. Fees charged are generally payable after the services have been provided, however, ongoing review service fees are generally paid in advance. The agreed fees may be documented in a Letter of Engagement, set out in a SOA, in a ROA, or via an OSA. Fee for service payments may be payable for:

- Initial Consultation – we may charge fees for your initial discovery meeting.
- Advice Preparation – we may charge fees for the preparation, presentation and/or implementation of our advice to you. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you.
- Ongoing Review Service – we may charge a fee to provide ongoing reviews, including further advice suitable to your needs.
- Ad hoc Fees – we may charge fees for other services where costs outside the above are incurred.

How are fees for services calculated?

Fees charged for our services may be:

- A dollar amount; or
- A percentage of the amount invested; or
- An hourly rate; or
- A combination of some or all of the above, as agreed with you.

Commissions

Fortnum Advice may receive payments in the form of initial commissions and/or ongoing commissions from the insurance product providers for any product you choose to use that is recommended by us.

These commissions are included in the fees and/or premiums you pay for the product. You do not pay these fees to us directly. We may rebate some or all of this to you.

How commissions (initial and ongoing) from a life insurance product are calculated?

Initial commission from a life insurance provider is typically up to 66% (inclusive of GST) of the first year's premium that you pay.

Ongoing commission can be up to 33% (inclusive of GST) of the premium from year two onwards for the life of the policy.

However, existing commission arrangements for insurance purchased prior to 1 January 2018 may continue to be paid in the same manner as what would have previously been advised to you.

The actual commission that will be received by Fortnum Advice, the Principal Practice, and your Adviser will be disclosed to you in your SOA, SOT or ROA.

Member Fees

Fortnum Advice may receive payments from the trustee of a superannuation fund, with which it has entered into a Member Services Agreement, in respect of the services provided to you on behalf of the trustee. Please refer to Part 2 of our Guide for further details (if applicable).

Managed Discretionary Account Service Fee

Fortnum Private Wealth Limited offer a Managed Discretionary Account (MDA) Service which Fortnum Advice may utilise. If a recommendation is made for you to utilise the MDA Service, then you will be charged a service fee which Fortnum Private Wealth Limited will receive.

Separately Managed Accounts and Managed Accounts

If a recommendation is made that you invest into a Salita Managed Account Portfolio, then Salita will receive fees derived from the recommended investment into the Salita Managed Account Portfolio. The fees are set out in the PDS and disclosure documents which will be provided to you. This payment may be included as part of, or in addition to, the Indirect Cost Ratio of the Portfolio.

Other forms of remuneration or benefits

Fortnum Advice, your Principal Practice and/or Adviser may be entitled to other benefits when providing services to you.

Fortnum Advice, your Principal Practice and Adviser keep registers of small value benefits (i.e. \$100 to \$300 in value) which may be received by them from product and service providers. These benefits are permissible unless they are received frequently or when similar benefits received combine to exceed \$300 per annum. If you would like a copy of the register, please ask your Adviser and it will be made available to you within seven days.

In addition, Fortnum Advice receives payments by product providers to support adviser training and professional development.

If your Adviser is an accountant who is subject to the Accounting Professional and Ethical Standards, under APES 230, all benefits received, regardless of value, will be recorded on their register.

PROFESSIONAL INDEMNITY INSURANCE

Fortnum Advice is covered by Professional Indemnity insurance satisfying the requirements under section 912B of the Corporations Act (2001) relating to insurance obligations. Our insurance arrangements cover claims made against us as the Licensee and for the conduct of any Fortnum Advice adviser (whilst acting as an Authorised Representative of our AFSL).

PROTECTING YOUR PRIVACY

We collect and keep a record of your personal information, including sensitive information (e.g. information about your health), in order to provide you services including advice. We may also use the information we have collected in order to comply with any legislative or regulatory obligations we have and to help us run our business.

Fortnum Advice is committed to the confidentiality and security of your personal information. It will be necessary for us to collect, use and disclose your personal information. If you do not consent to this, or we are unable to collect all the necessary personal information, we will not be able to provide you with the relevant financial planning and advice services.

In most cases, we collect personal information directly from you. In other cases, however, we may collect your personal information from third parties. The third parties we may collect from include, but are not limited to: your accountant, your lawyer or solicitor, other financial services institutions, insurance providers and any other third parties where you have provided consent. In order to manage and administer our financial planning services, it may be necessary for us to disclose your personal information to third parties. The parties to whom we may disclose your personal information include, but are not limited to: financial institutions for the provision of financial products, such as investments, superannuation, and life insurance; auditors; third parties providing mailing services, administration support, maintenance of our information technology systems, printing of our documents, research services; any government or regulatory body for whom we have a legal obligation to

provide this information to; referral partners.

It is possible that an organisation listed above may disclose your personal information to overseas recipients, but it is not possible for us to provide any further details of that in this document.

We may disclose your personal information to an entity which is located outside of Australia, to enable them to undertake specified services on behalf of Fortnum Advice, your Adviser or Principal Practice.

In addition, the Principal Practice and/ or your Adviser may disclose your personal information to overseas recipients in order to access services they provide, such as paraplanning and administration.

Details of this can be found in the Fortnum Advice Privacy Policy, which includes details of how you may access, and seek correction of, your personal information which we hold. It also includes details of how you may complain if you believe that we have breached the Australian Privacy Principles under the Privacy Act and how we deal with such complaints.

You may obtain a copy of the Fortnum Advice Privacy Policy by telephoning us on (02) 9904 2792 or by visiting our website at www.fortnum.com.au.

You can authorise another person to act on your behalf, to receive information and/or undertake transactions. Both requesting this to occur, and removing this authorisation, are required to be notified in writing.

Where your Adviser becomes a representative of, or sells their business to, another AFSL, Fortnum Advice may also use and disclose the information collected about you to enable your Adviser or the new business owner to continue to provide you with financial products and services.

We collect your personal information as permitted by, and in accordance with, the Privacy Act. Other legislation may also apply, such as the Anti-Money Laundering and Counter-Terrorism Financing Act.

ABSENCE OF RELEVANT INFORMATION

If you do not wish to provide the information required to formulate your recommendations, your Adviser will advise you about the possible consequences of not having disclosed your full personal information and the impact on the recommendations given. You should consider these implications carefully.

Australia's financial markets are fair and transparent, supported by confident and informed investors and consumers. You can contact ASIC at:

Australian Securities and Investments Commission

PO Box 4000

Gippsland Mail Centre Victoria 3841

www.asic.gov.au

By calling 1300 300 630.

IF YOU HAVE A COMPLAINT

In the first instance, if you are unhappy with the advice or service provided by your Adviser, Practice Principal, or Fortnum Advice, you can let us know by putting your concerns in writing or by calling us.

We will investigate your complaint and respond to your concerns as quickly as possible and within 30 days.

Complaints Officer (Fortnum Advice)

PO Box R1872

ROYAL EXCHANGE NSW 1225

By email at complaints@entireti.com.au; or

By calling (02) 9904 2792 – select option 1.

If we have not responded to your complaint within 30 days, or if you feel it has not been resolved to your satisfaction, you may refer your concerns to the Australian Financial Complaints Authority (AFCA), which provides an accessible, fair and independent dispute resolution service. You can contact AFCA at:

Australian Financial Complaints Authority Limited

GPO Box 3

Melbourne VIC 3001

www.afca.org.au

By email at info@afca.org.au; or

By calling 1800 931 678.

You can also contact the Australian Securities and Investments Commission (ASIC). ASIC is Australia's corporate, markets and financial services regulator. ASIC contributes to Australia's economic reputation and wellbeing by ensuring that

ABOUT US

Our Practice, Nestworth Financial Solutions Pty Ltd trading as Nestworth and our Advisers are Authorised Representatives of Fortnum Advice Pty Ltd (Fortnum Advice).

Our Practice has been established to provide a range of wealth advice and expertise to assist clients with every aspect of their financial situation. Our Practice has a disciplined approach to helping you build and manage your plan for financial independence.

Below are our Practice details and how you can contact us:

Name	Nestworth Financial Solutions Pty Ltd	Phone	1800 678 984
CAR	440639	Email	info@nestworth.com.au
Address	Level 4 Transport House, 230 Brunswick Street, Fortitude Valley, QLD 4006	Website	www.nestworth.com.au

WHAT WE DO

We can provide advice on the below types of financial products and services. Your Adviser may not be qualified in all of the products and services below. Please refer to their individual Adviser Profile for their qualifications and the advice they can assist you with.

The types of financial product advice our Advisers can provide you:	The services our Advisers can provide you:
• Deposit and payment products. • Debentures, stocks or bonds issued or proposed for issue by a government. • Life investment or life risk products. • Interests in managed investment schemes, including Investor Directed Portfolio Services (IDPS or 'Wrap'). • Managed Discretionary Account (MDA) services*. • Retirement savings accounts. • Superannuation. • Self-Managed Super Funds (SMSF)*. • Margin Lending Facilities*. • Listed Securities*.	• Investment strategies including gearing and savings plans. • Budget and cash flow planning. • Debt management. • Superannuation advice, including salary sacrifice and consolidation strategies. • Self-Managed Super Funds (SMSF)*. • Personal insurance strategies. • Centrelink / DVA advice. • Retirement planning advice. • Aged Care*. • Estate planning advice. • Advice on ownership and structures (e.g. discretionary and family trusts). • Portfolio review services. • Ongoing advisory services.

*Accredited Advisers only. Our Advisers may also engage by referral the use of specialists such as (but not limited to) accountants and solicitors.

Our Tax Services

Nestworth Financial Solutions Pty Ltd advisers are all listed on the Financial Adviser Register as a Qualified Tax Relevant Provider (QTRP) with Australian Securities and Investments Commission (ASIC). This means that all

advisers of Nestworth Financial Solutions Pty Ltd can provide tax advice in regard to the strategies and financial products that they recommend to you.

OUR FEES

Fees will be agreed based on your requirements and the complexity of your financial circumstances. All fees charged will be fully detailed in the Letter of Engagement or Statement of Advice you receive and will be agreed with you prior to you becoming liable for them.

We will discuss and agree on the method of payment with you before we provide you with our services. Generally, we will either invoice you directly, or deduct from your investments, or adopt a combination of these methods for the fees payable. Cash transactions will not be accepted.

Fee for Service

Initial Consultation	May incur a cost were agreed due to complexity, however, are generally offered without obligation or cost.
Developing Strategy or Scenario Analysis	The cost will be determined after considering the complexity of the work to be completed, and you will be advised of the amount before we undertake the work. Typically, the cost will range between \$250 to \$2,200 (including GST).
Advice Preparation – Specific Advice	Generally, relates to advice on a single service or strategy, i.e. investment portfolio, superannuation contribution or pension, etc. Typically, the cost will range between \$250 to \$5,500 (including GST).
Advice Preparation – Complex Advice	Includes multiple strategies and service areas developed into a comprehensive strategic plan. The cost will be determined by the complexity of the advice and services required to meet your specific financial goals and objectives, and the estimated time necessary to both prepare appropriate recommendations and provide ongoing portfolio services for twelve months after implementation of the recommendations. Typically, the cost will range between \$990 to \$16,500 (including GST).
Implementation Fee	We may charge an Implementation fee where you accept our recommendations, and you ask us to implement them for you. It is payable at the time of implementation and typically the cost will range between \$250 to \$3,500 (including GST).
Ongoing Review Service	Access to Ongoing Review Service – portfolio and risk management, progress reporting and advice is available for a monthly cost which will be determined after considering the complexity of the ongoing services agreed. You can arrange for the payment to be taken directly from a bank account or your portfolio under a fee for service arrangement. The minimum cost starts at \$125 per month (including GST). If we have no ongoing service arrangement with you, you need to ask us for advice or a review. We may then charge you a fee for any services we provide. The fee and how it is to be paid will be agreed to between you and your chosen Adviser before work is commenced and disclosed in your applicable advice document.
Ad hoc Fees	Where other costs outside the above are incurred, you may be charged a maximum of \$440 per hour (including GST).
Claims Management Service	We may charge a fee where you require assistance to process an insurance claim. The fees for this service will depend on the complexity of your situation

and may be charged as follows:

- A fixed dollar amount; or
- An hourly rate; or
- A combination of both.

The fee will be discussed and agreed upon with you prior to assisting you with your claim.

In some cases, we may decide an external specialist may be required to assist with your claim. If this occurs, we will confirm with you prior to engaging the external specialist. The fees for any external specialists will be an additional fee separate to our fee.

Insurance Commissions

Commissions

Insurance commissions may be paid by product providers to Fortnum Advice, who, in turn, may pay a proportion of this to Nestworth Financial Solutions. If your Adviser receives a proportion of this remuneration, they will inform you of the amount at the time they provide you with advice.

Payments we receive

All fees for services paid by you and/or commission paid by product and service providers are paid to Fortnum Advice. The relationship between Fortnum Advice and the Principal Practice is arranged through a flat fee agreement. This agreement stipulates that 100% of the remuneration is paid to the Practice. Therefore, Fortnum Advice will retain 0% and the Principal Practice will receive 100%. Nestworth Financial Solutions Pty Ltd may share part of this amount with your Adviser.

Your Statement of Advice, Statement of Transaction or Record of Advice will provide further details of amounts paid to Fortnum Advice, Nestworth Financial Solutions Pty Ltd and your Adviser.

Payments our Advisers receive

Diane Scott and Reece Lewis are employees of Nestworth Financial Solutions and have been appointed as Authorised Representatives of Fortnum.

They each may be remunerated by one or more of the following methods. If any are relevant to the advice provided to you, further details will be set out in your advice document:

- Your Adviser may be paid a salary based on experience, capability and responsibilities within Nestworth.
- Your Adviser may be eligible to receive a bonus based on a combination of revenue and other non-financial measures that relate to compliance, staff training and the quality of service.

Referrals to us and others

We may provide you with a referral to other professionals. This may include, but is not limited to, accountants, mortgage brokers and legal practitioners. You may also have been referred to us by another professional.

We will not receive any referral payments for referrals we make.

We may give a payment for referrals to us. If this is the case, we will inform you of this payment prior to the referring party being entitled to the payment.

OTHER IMPORTANT DETAILS

Managed Discretionary Account Service

Fortnum Advice utilise the Managed Discretionary Account (MDA) Service licensed via arrangement with Fortnum Private Wealth Ltd.

If your Adviser recommends you establish an MDA, at the time of the recommendation they will provide you with a *Fortnum Private Wealth Ltd Managed Discretionary Account Service Financial Services Guide*, which, when an MDA Service is recommended, forms part of our FSG and must be read in conjunction with Part 1 – General Details and Part 2 – Principal Practice Profile. It will provide information about: what an MDA Service is; the documentation you should receive; the risks of the Service; the fees and costs and other important information.

Our Relationships and Associations

The extensive list of products and services approved by Fortnum Advice includes products and services provided by entities with whom Fortnum Advice director, employee, Nestworth Financial Solutions and/or your Adviser have a relationship or association, either directly or via a related entity.

We believe that your interests should be placed first and that products and services should only be recommended if it is in your best interests.

However, it is important that you know of, and are comfortable with, those relationships and associations and any benefits that arise.

Our relationship with AZ Next Generation Advisory Pty Ltd (AZ NGA)

Nestworth Financial solutions advisers are a member of the AZ NGA Group of companies. AZ NGA is majority owned by Azimut Group and Oaktree Capital Management. Azimut is Italy's largest independent asset manager and Oaktree is a global investment manager.

From time to time your adviser may recommend you apply for, acquire, vary or dispose of a financial product issued by members of the Azimut and Oaktree Groups.

Your adviser does not receive any direct remuneration or other benefit as a result of its recommendation to apply for, acquire, vary or dispose of a financial product issued by these related companies as any remuneration and benefit are received by the product issuer and ultimately our common parent company.

Reece Lewis

Authorised Representative Number	1267035
Phone	1800 678 984
Email	reece.l@nestworth.com.au
Qualifications	Master of Financial Planning Diploma of Financial Planning Bachelor of Business Aged Care

Advice and services I can provide

- Deposit and payment products.
- Debentures, stocks or bonds issued or proposed for issue by a government.
- Life investment or life risk products.
- Interests in managed investment schemes, including Investor Directed Portfolio Services (IDPS or 'Wrap').
- Managed Discretionary Account (MDA) services.
- Retirement savings accounts.
- Superannuation.
- Margin Lending Facilities.
- Aged Care

Experience

Reece started working in financial services in the UK in 2015. Since then, he has returned to Australia and began working as an adviser in 2018. He has a strong passion for helping clients achieve their goals through considered strategic advice.

Reece is also authorised to provide advice under Nestworth Financial Solutions authorised under Fortnum Private Wealth.

Diane Scott

Authorised Representative Number	1003672
Phone	1800 678 984
Email	diane.s@nestworth.com.au
Qualifications	Graduate Diploma of Financial Planning Advanced Diploma of Financial Planning Diploma of Financial Planning Securities
Professional Memberships	Financial Advice Association Australia (FAAA)
Professional Designations	Financial Planner (AFP®)

Advice and services I can provide

- Deposit and payment products.
- Debentures, stocks or bonds issued or proposed for issue by a government.
- Life investment or life risk products.
- Interests in managed investment schemes, including Investor Directed Portfolio Services (IDPS or 'Wrap').
- Retirement savings accounts.
- Superannuation.
- Margin Lending Facilities.
- Self-Managed Super Funds (SMSF).
- Securities

Experience

Diane has been dedicated to the financial planning industry since 2006. With a career that started at a small firm in Maroochydore, Di developed a passion for planning and embarked on her journey to become a financial adviser.

Diane is also authorised to provide advice under Nestworth Financial Solutions and Nestworth Financial Strategists authorised under Fortnum Private Wealth.

Fortnum Advice Pty Ltd
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AFSL: 519 190

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