

# **FINANCIAL PLANNING FINANCIAL SERVICES GUIDE (Part 1)**

**Date of issue 1 March 2025 - Version 13.0**

### Lack of Independence

To avoid the potential for any conflict of interest, InterPrac Financial Planning, although not a subsidiary of, nor controlled by, any Bank or Insurer states that it is not independent, impartial, or unbiased.

It is a subsidiary of the Sequoia Financial Group, ASX Code SEQ which provides scale and broad-based approved products and services that an Adviser may recommend if it is in client's Best Interests.

## What is a Financial Services Guide?

We understand how important financial advice is and wish to thank you for considering choosing an InterPrac Financial Planning adviser to assist you in identifying and achieving your financial goals.

This Financial Services Guide - Part 1, together with the Adviser Profile - Part 2, are designed to help you get to know InterPrac Financial Planning Pty Limited and our Authorised Representative (Adviser), a little better. This will help you decide whether you would like to use our financial services and explain what to expect and how much you can expect to pay for those services.

Our Advisers are required to provide or make available these documents to you **prior** to providing any personal financial advice, products and/or services.

The Financial Services Guide - Part 1 contains information about:

- InterPrac Financial Planning as a licensee.
- The financial services we offer and how we provide advice and make recommendations.
- Fees, commissions and other benefits that may be paid to us.
- The collection and handling of your personal information (our Privacy Policy).
- What to do if you should have a concern or complaint about our service.

The Adviser Profile - Part 2 contains important information about your Adviser. This includes their Authorised Representative number, accreditations, qualifications and experience, areas of advice and types of financial services they can provide. It also details how they get paid and fees that you may be charged. If you have not yet received an Adviser Profile, please ask your adviser for a copy or contact InterPrac Financial Planning head office.

## About InterPrac Financial Planning

InterPrac Financial Planning was established in 2004 to work with accountants and likeminded financial planners for whom the relationship will always be with the client. Over the years we expanded our services for the benefit of our Advisers and their clients. InterPrac Financial Planning has on Multiple occasions been awarded the IFA Excellence Award by a judging panel of industry leaders.

To continue to provide the support and training to our national network of Advisers, in December 2017 InterPrac became part of the listed Financial Services entity Sequoia Financial Group Ltd ASX Market Participants (SEQ). This provides InterPrac advisers and their clients access to dedicated broking and listed equity support as well as access to Initial Public Offerings (IPO's). In addition to retaining access to general insurance, finance brokers, SMSF admin and NTAA Corporate for the provisions of company trusts and super fund documents.

Sequoia Financial Group Ltd is the parent company of InterPrac and operates through multiple entities that provide specialised financial services to support our clients and advisers. For a list of key entities and their roles, please visit [www.sequoia.com.au](http://www.sequoia.com.au), where you'll find a comprehensive overview of our structure, ownership, and the services available through our network.

The following entities are wholly owned by Sequoia Financial Group and issue financial products:

- Sequoia Specialist Investments Pty Ltd
- Sequoia Home Loans Pty Ltd

Additionally, Sequoia Financial Group holds a minority stake (currently 20%) in Euree Asset Management.

InterPrac Financial Planning will continue to act under its existing licence and management yet be able to draw on the experience, financial strength and opportunities that an ASX listed group can offer.

InterPrac Financial Planning and its Advisers will always aim to act in your best interests. All strategies and products used will address your personal circumstances and needs.

InterPrac Financial Planning is responsible for the financial services provided by our Advisers and have authorised the distribution of this Financial Services Guide - Part 1 and Adviser Profile - Part 2.

InterPrac Financial Planning contact details:

**InterPrac Financial Planning Pty Ltd**  
Australian Financial Services Licence: 246638  
Suite 1, Level 20, 555 Collins Street,  
Melbourne, VIC 3000  
Phone: (03) 9209 9777

## Financial Services we can provide

InterPrac Financial Planning is licensed to provide financial advice and deal in financial products by acquiring, varying or disposing for retail or wholesale clients:

- Deposit Products;
- Interests in Managed Investment Schemes including Unit Trusts, Investment Bonds, Property Trusts, Growth Funds, Balanced Funds, Index Funds, IDPS, RSAs, Government Bonds, Debentures and Cash Management Accounts;
- Securities and Derivatives limited to old law options contracts and warrants.
- Superannuation, including Allocated Pensions, Rollovers, Personal Superannuation, Company Superannuation and Self Managed Superannuation Funds;
- Retirement Planning including aged care and estate planning;
- Life Insurance Products, including Annuities, Term Insurance, Income Protection, Trauma and Total and Permanent Disability Insurance;
- Standard Margin Lending

The Adviser Profile - Part 2 details specific services your Adviser is able to advise on.

## What is the Financial Advice process?

The Financial advice process starts with client engagement, identification of goals and objectives and the comprehensive information gathering process.

By agreement we will then formulate the strategies that we believe will best meet your goals and objectives.

These strategies will then be provided in a statement of advice record.

The agreed Recommendations will then be implemented, and on-going service and reviews are then discussed.

## What can I Expect?

Your Adviser is committed to providing quality financial advice and a choice of products and/or services to suit your circumstances. Whilst we are licensed to provide a range of services, we are also obliged under law to have a reasonable

basis for our advice and to act in your best interests when providing financial advice, addressing your needs and the solutions you want us to assist you with.

Your adviser is also subject to an Ethical Code that opposes conflicts of interest & misrepresentation whilst promoting efficient, honest & fair dealing; enabling your free, prior & informed consent to recommendations, fees & services.

We will not compromise on our advice and will take this responsibility very seriously.

In order to achieve this, your Adviser will need to determine your needs, objectives and relevant financial circumstances before providing advice, products and/or services to you. You will be asked to provide accurate information and to keep your adviser updated on any changes to your circumstances to ensure the advice provided and products recommended remains relevant to your personal situation.

You have the right not to divulge any information should you wish not to do so, however, in such cases, your adviser will warn you about the possible consequences of not providing relevant personal and financial information and how this may impact the quality and reliability of the advice provided. Additionally, your adviser may also decline to provide advice if they feel they cannot do so adequately with the information provided or the advice would be beyond their formal expertise.

Before providing any financial products and/or services to you, we are also required to verify your identity in accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. Your adviser will let you know what documentation is needed to meet these customer identification requirements.

Subject to its appropriateness for you, any product recommended to you by your Adviser must be included on InterPrac Financial Planning's Approved Products List. This list is constructed and maintained by the InterPrac Financial Planning Investment Committee, using ratings and reports from leading research groups.

The purpose of the list is to ensure that:

- Recommended product providers have the necessary skills, resources and experience to achieve their stated investment objectives and
- Our Advisers have a broad range of researched products to select from in meeting the diverse needs of their clients.

In instances where your Adviser may need to consider products outside the Approved Products List, they may apply to InterPrac Financial Planning for special consideration.

To ensure that you remain on track to meet your short to long-term needs and objectives, it is vital to periodically review your financial advice, products and/or services based

on your needs, objectives and circumstances to be sure they remain relevant. Where you enter into an ongoing fee arrangement, your adviser will offer and hold an annual comprehensive personal review service. This service updates the advice in line with your needs and implements any changes which you have agreed upon. A fee may be charged for the ongoing advice and management of your financial affairs. Your adviser will provide you with details of any such fees applicable to you.

## Does everything need to be in Writing?

Your adviser may accept instructions from you via phone, letter, email or fax. In some instances, your adviser can only accept written instructions from you, and they will let you know when this happens.

Your adviser is required to maintain a paper or electronic record of your personal information, including details of your relevant personal circumstances. Your adviser is also required to maintain records of documentation for any financial advice given to you in the course of taking instructions from you, as well as any documents containing advice they have provided you. Please see our **Privacy Policy** regarding the care of this information in accordance with the Australian Privacy Principles.

## What Financial Advice Documents can I expect?

When you are provided with personal advice that considers your needs, objectives and relevant financial circumstances, you will receive a **Statement of Advice**. This sets out the specific advice given to you, including any recommendations about particular financial products and services, and the basis on which those recommendations are made. This also provides information on the amount of any commissions and other fees payable in respect of financial products recommended to you in connection with this advice.

Under certain circumstances your financial adviser may provide you with a **Record of Advice**, rather than a Statement of Advice. A Record of Advice performs a similar function to a Statement of Advice, but is typically a shorter, more informal document.

Where you enter an **Ongoing Fee Arrangement** with your adviser, you will need to renew this consent annually for it to continue.

Any fee/service arrangement can be terminated by either party, preferably in writing or the arrangement will lapse automatically if not renewed.

Should you misplace your documentation, you may request in writing, a copy of any advice document you received, up to seven years after the advice has been

given. Please refer to the **Privacy Policy – Access to Personal Information** for details on requesting a copy of your documentation.

## What Fees & Charges can I expect?

InterPrac Financial Planning prefers that our Advisers are paid on a 'fee for service' basis. In some instances, insurance providers may pay commission. Depending on the provider, all fees and commissions are paid directly to InterPrac Financial Planning on a fortnightly, monthly or quarterly basis. InterPrac Financial Planning retains a portion of the fee and commission income generated by each Adviser. InterPrac then pays the balance of the fee and commission income to your Adviser.

Please refer to the Adviser Profile - Part 2 which sets out the specific details of payments to your Adviser and/or any third parties, and the fees you may be charged.

InterPrac Financial Planning receives payments or benefits from certain product as part of an Education and Training partnership. These funds are used for the approved purposes of Education and Training and are not payable to your adviser. In return these providers are granted opportunities to participate in events such as Professional Development days. These payments are only to offset the cost of providing education and training for our advisers.

InterPrac Financial Planning has arrangements with Diversa and Australian Practical Superannuation Pty Ltd to provide marketing and administration services for which it receives a fee. This fee is not payable to your adviser and where relevant is detailed in the Statement of Advice.

InterPrac Financial Planning and its Advisers are prohibited from accepting gifts or inducements over \$300. Any benefit given to InterPrac Financial Planning between \$100 to \$300 will be recorded in a Gifts Register. A copy of your adviser's and InterPrac Financial Planning's registers are available on request. If you wish to inspect either register, please contact your adviser or our Head Office.

## Referral Fees

InterPrac Financial Planning and its Advisers work closely with many professional people and organisations such as accountants and solicitors. Where referrals are received from these sources on a business-to-business level, a referral fee may be paid.

Please note, Referral fees may not be received by or paid to advisers individually. This is to ensure that no conflicts of interest can arise.

Also note that referral fees are not a separate charge to you, they are paid from the fees received by InterPrac Financial Planning.

## What to do if I have a Complaint

InterPrac Financial Planning is committed to providing quality financial services in an efficient and honest manner. We take all complaints seriously and have developed a formal complaint handling process to deal with any complaints from our clients. A copy of the Complaints (IRD) Policy is available from your Adviser or InterPrac Financial Planning. If you do have a complaint:

1. Please contact your Adviser directly to discuss the issue and seek a resolution.

If the complaint cannot be resolved by talking to your Adviser, please contact InterPrac Financial Planning Head Office directly:

**The Complaints Officer**  
**InterPrac Financial Planning Pty Ltd**  
Suite 1, Level 20, 555 Collins Street,  
Melbourne, VIC 3000  
Phone: (03) 9209 9777  
Email: [compliance@interprac.com.au](mailto:compliance@interprac.com.au)

2. InterPrac's complaints process (dispute resolution service) can be found at [www.interprac.com.au](http://www.interprac.com.au) or can be supplied in hardcopy by your adviser upon request.
3. If InterPrac Financial Planning is not able to resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Australian Financial Complaints Authority, a dispute resolution service for the financial planning industry.

**Australian Financial Complaints Authority**  
GPO Box 3, Melbourne VIC 3001  
Phone: 1800 931 678  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Website: [www.afca.org.au](http://www.afca.org.au)

## Professional Indemnity Insurance

All InterPrac Financial Planning Advisers are covered by Professional Indemnity Insurance as required by the Corporations Act, meeting ASIC requirements and covering present and past Authorised Representatives (Advisers).

## Privacy Policy

The privacy of our clients and their personal information is an important issue for InterPrac Financial Planning. All information is collected, held and used by us in the strictest confidence and pursuant to the InterPrac Privacy Policy. The following policy outlines how InterPrac complies with the Australian Privacy Principles, and how we collect, use, disclose and manage personal information.

### Confirming your identity

In accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006, InterPrac Financial Planning are required by law to collect and maintain identification documents such as Drivers' Licences and Passports that allow us to satisfactorily confirm your identity.

### Collection of Information

- InterPrac Financial Planning collects and holds your personal information for the sole purpose of providing financial services to you, and discharging our legal obligations.
- If the information you provide to us is inaccurate or incomplete, it may impact the quality and appropriateness of our recommendations.
- Where we are arranging insurance and/or investment products for you, we will be required to collect and lodge relevant information for the purposes of those applications.
- Where you provide us with information about another person, such as your nominated beneficiary, you must ensure that they are aware information has been provided to us and of the existence of this document.

### Use and Disclosure

We will only use or disclose your personal information in the following circumstances:

- For the purpose of providing you with financial services, or in arranging for the application of insurance or investments on your behalf;
- Where you provide your consent, either expressly or the individual would reasonably expect the APP entity to use or disclose the information for the secondary

purpose implied by your behaviour, for information to be provided to a third party (e.g. your accountant);

- Where we are required by law;
- Where we are using the information in a direct marketing communication (you will have the option of electing not to receive direct marketing materials).

### **Quality of Information**

We will make every effort to ensure that the personal information we collect is accurate, complete and up-to-date, however we will rely on you informing us if your personal details change.

### **Security of Information**

We will take reasonable steps to protect the personal information we hold from misuse, loss, and from unauthorised access, modification or disclosure. Where your personal information is no longer needed, and we are not required by law to maintain it, we will ensure that it is securely and permanently destroyed.

### **Access to Personal Information**

You may at any time request access to your personal information from the past 7 years, that we hold.

We will endeavour to comply with your request as soon as possible, which would normally be within a period of 14 days. In most cases there will be no charge for providing such information, however, requests involving large amounts of information may incur a handling fee.

### **Contacting InterPrac Financial Planning**

If you have a complaint in regards to the collection or use of your personal information, or have an enquiry about this Privacy policy, please write to:

#### **Privacy Officer**

**InterPrac Financial Planning Pty Ltd**

Suite 1, Level 20, 555 Collins Street,

Melbourne, VIC 3000

Phone: (03) 9209 9777

Email: [compliance@interprac.com.au](mailto:compliance@interprac.com.au)



# Pathways2wealth Pty Ltd

## FINANCIAL PLANNING

## FINANCIAL SERVICES GUIDE (Part 2)

### Adviser Profile

**Date of issue 14 April 2025 - Version 13.0**

The financial services offered in this Guide are provided by:

**Neil Ramjee** Authorised Representative No. 416586

Pathways2wealth Pty Ltd ABN 56 149 349 075

Level 2, 1006 Doncaster Road

DONCASTER EAST VIC 3109

**Phone** 03 9870 9275 **Mobile** 0438 459 362 **Email** [nramjee@pathways2wealth.com.au](mailto:nramjee@pathways2wealth.com.au)

InterPrac Financial Planning Pty Ltd ABN 14 076 093 680

Australian Financial Services Licence Number: 246638

Suite 1, Level 20, 555 Collins Street, Melbourne Vic 3000

Ph: (03) 9209 9777

## About Your Adviser Profile

We understand how important financial advice is, and thank you for considering engaging our services to assist you in identifying and achieving your financial goals and objectives.

To assist you in choosing a financial planner, our advisers are required to provide a Financial Services Guide - Part 1 and an Adviser Profile - Part 2, to you **prior** to providing any personalised financial advice, products and services.

These documents provide you with information regarding the financial planning advice process and charging model used by **Niranjan Ramjee (Neil Ramjee)**, Authorised Representative No. **416586** of InterPrac Financial Planning Pty Ltd (AFSL 246638) to ensure that you have sufficient information to confidently engage **Neil** to prepare financial advice for you.

**Neil operates under Pathways2wealth Pty Ltd, Corporate Authorised Representative No. 1262687.**

If you have not yet received a copy of our Financial Services Guide - Part 1, please ask your Adviser for a copy or contact InterPrac Financial Planning head office.

## About Your Adviser

Neil has been in the finance sector for more than 25 years, initially as an accountant and then moving onto financial planning.

Neil specialises in Debt Management, Wealth Creation, Personal Insurance, Superannuation and Retirement Planning, Estate Planning, Centrelink and Aged Care.

Neil's qualifications and memberships include:

- Diploma of Financial Services (Financial Planning)
- Advanced Diploma of Financial Planning
- Cavendish & ICFS Specialist SMSF Course
- Bachelor of Accounting (University of Zimbabwe)

### Neil Ramjee

Authorised Representative No. **416586**

**Neil operates under Pathways2wealth Pty Ltd, Corporate Authorised Representative No. 1262687**

Address: Level 2, 1006 Doncaster Road  
DONCASTER EAST VIC 3109

Phone: 03 9870 9275

Mobile: 0438 459 362

Email: [nramjee@pathways2wealth.com.au](mailto:nramjee@pathways2wealth.com.au)



## Financial Services Your Adviser Provides

The financial services and products which **Neil** can provide advice on comprise:

- Deposit Products;
- Managed Investment Schemes including Unit Trusts, Investment Bonds, Direct Shares, Property Trusts, Growth Funds, Balanced Funds, Indexed Funds and Cash Management Accounts;
- Share Market Investments;
- Tax Effective Investments;
- Superannuation, including Allocated Pensions, Rollovers, Personal Superannuation, Company Superannuation and Self Managed Superannuation Funds;
- Retirement Planning including aged care and estate planning;
- Life Insurance Products, including Annuities, Term Insurance, Income Protection, Trauma and Total and Permanent Disability Insurance;
- Margin Lending (subject to client understanding of Margin Lending Gearing).

## Fees and Payments

**Neil** is a professional adviser who receives payment for the advice and services provided. Your adviser will receive payment either by collecting a fee for service, receiving commissions, or a combination of both.

**Fee for service** - Fees are charged according to the work undertaken by your adviser and may be charged on an hourly basis or as a flat fee. A fee may be charged for the initial work in developing and implementing a strategy, as well as for ongoing monitoring and reviews.

**Commission** - Your adviser may receive upfront and ongoing commission for the personal insurance services they provide. Whilst there are a number of commission rates available, with effect from 1 January 2020, Life Insurance commissions are capped at 66% (including GST). Ongoing commission on Life Insurance is capped at 22% (including GST) on renewals.

Commissions are not an additional charge to you, they are paid by product providers for insurance or investment policies.

**Our fees and charges** vary according to the scope and complexity of the advice required. The scope of the work and the fees charged for services are agreed with clients prior to commencing work.

As a guide **Neil's** advice fees are \$330 per hour including GST.

Before providing advice, we will agree the fees and payment options with you. The fee you pay will depend on the complexity of your circumstances and the services you require. Your options to pay for our services can include fee for service, commission, or a combination of both.

Fee for service is based on the service we provide. This fee can be determined by:

- An hourly rate.
- A fixed dollar amount.
- A percentage of funds invested (excluding borrowed funds).
- A combination of these methods.

We can invoice you directly for our fee for service. Alternatively, some products allow an adviser service fee to be deducted from the balance of your investment.

The Statement of Advice provided to you by your adviser will clearly set out all fees, charges and commissions payable.