

FINANCIAL SERVICES GUIDE

Version 10 – Date of Issue: 03rd July 2025

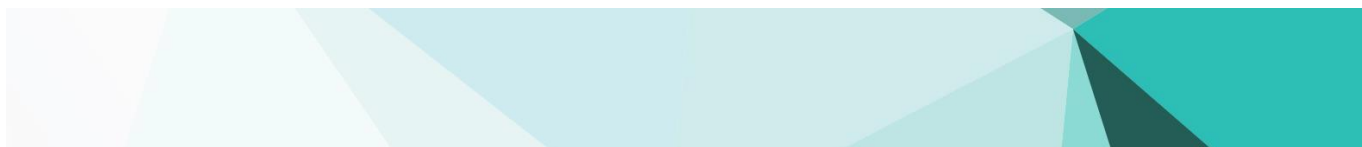
This Financial Services Guide (FSG) is provided to you by PWM RBI Pty Ltd trading as Vivid Advisory (CAR number 1315775) and Thor-Bjorn McDowell (AR number 410880 (referred to as "your Adviser" or "we/us"). Your Adviser is an Authorised Representative of Boston Reed Pty Ltd (ABN 89 091 004 885, Australian Financial Services Licence (AFSL) No 225738). Boston Reed Pty Ltd is our Australian Financial Services Licensee. For the purposes of the Corporations Act, PWM RBI Pty Ltd trading as Vivid Advisory (CAR number 1315775 and Thor-Bjorn McDowell (AR number 410880) is/are the 'providing entity' for the financial services outlined in this guide.

Street: 10 Elizabeth Street, Tighes Hill NSW 2297

Postal: PO Box 322, Hamilton NSW 2303

Telephone: 0410 016 230

Email: thor@vividadvisory.com



The Purpose of this Financial Services Guide (“FSG”)

This Financial Services Guide (“FSG”) is an important document which provides you with information to help you decide whether to use our financial services.

This FSG is an important document which tells you about Boston Reed Pty Ltd, PWM RBI Pty Ltd trading as Vivid Advisory and Thor-Bjorn McDowell (together “we”, “our” or “us”) and the financial services we may provide to you.

It is provided to assist you in deciding whether to use any financial services provided by us and should be read in conjunction with any other documents you may receive from us. It also explains how we provide financial product services to you, information about remuneration that may be paid to us in relation to services offered and information on how complaints are dealt with.

You should read this FSG carefully before using our services. It is intended to give you sufficient information to decide whether to obtain financial services from us.

1. About your Adviser and Boston Reed Pty Ltd

Your Adviser is Thor-Bjorn McDowell. Thor is engaged by PWM RBI Pty Ltd trading as Vivid Advisory, a Corporate Authorised Representative of Boston Reed Pty Ltd. Thor-Bjorn McDowell is also an authorised representative of Boston Reed Pty Ltd.

Our Licensee is Boston Reed Pty Ltd (ABN 89 091 004 885), that holds Australian Financial Services License (‘AFSL’ Number 225738) and has Authorised the issuance of this Financial Services Guide (“FSG”). Boston Reed Pty Ltd has authorised us to provide the financial services described in this FSG on their behalf. Further details about your adviser, including qualifications and experience, are contained in the ‘Adviser Profile’ document, which should be read in conjunction with this FSG.

Lack of Independence

The advice provided is not independent, impartial and unbiased as we may receive insurance commissions and other non-monetary benefits from product providers as explained in this FSG under the heading “Our Remuneration for Financial Services Provided”.

All recommendations are made with a focus on client best interest and in accordance with the Corporations Act and FASEA Code of Ethics.

2. Financial services we provide

Boston Reed Pty Ltd, and we, as its Authorised Representative(s), are Authorised to provide financial product advice and arrange dealings in relation to the following classes of financial products to retail and wholesale clients:

- Investments:
 - Basic and non-basic deposit products (and non-cash products - Arranging dealings only – we do not provide advice on these products);
 - Interests in managed investment schemes including investor directed portfolio services;
 - Securities
- Life products including life investment and life risk insurance products;
- Retirement planning (Retirement savings accounts); and
- Superannuation.

The scope of financial services we provide to you is identical to the relevant authorisations held by Boston Reed Pty Ltd under its Australian Financial Services Licence.

Non-cash payment products are stored value cards, electronic cash and direct debit services.

3. Our contact details

Boston Reed may be contacted at:
Street: Unit 6, 68-70 Old Princes Highway, Beaconsfield VIC 3807
Postal: PO Box 284, Beaconsfield VIC 3807
Telephone: (03) 7006 5270
Email: info@bostonreed.com.au

Your Adviser may be contacted at:
Street: 10 Elizabeth Street, Tighes Hill NSW 2297
Postal: PO Box 322, Hamilton NSW 2303
Telephone: 0410 016 230
Email: thor@vividadvisory.com

4. Our Remuneration for Financial Services Provided

Our professional costs and other charges: who receives the fees?

The professional costs and other charges for our advice and services will be fully disclosed to you before any significant work is undertaken. These will be explained in your meeting and detailed in your Advice Document (such as a Statement of Advice) and on an annual basis where applicable.

The types of professional costs, fees, commissions and other benefits that may be received by PWM RBI Pty Ltd trading as Vivid Advisory and Boston Reed Pty Ltd are described below:

Professional costs for Advice and Services

The provision of advice and services (including preparation, presentation and implementation of advice) by PWM RBI Pty Ltd trading as Vivid Advisory will be charged on a fee for service basis. These professional costs will be based on your individual circumstances, the complexity involved in your situation and the time required for the required advice and/or services. PWM RBI Pty Ltd trading as Vivid Advisory will provide you with written estimates of these professional costs to ensure transparency.

Tailored Annual Service /Ongoing Advice Fees

PWM RBI Pty Ltd trading as Vivid Advisory may offer you our tailored annual service or ongoing portfolio reviews. These services may be charged as an agreed fixed price or a fee based on the value of funds under advice and/or the time involved. The professional costs and details of any ongoing service will be presented in a fixed price agreement or separate service agreement for your consideration.

Salaries to staff and other services to you

The payment of staff salaries does not influence our advice. The provision of accounting services and other business services to you for a fee does not influence our advice in any way.

Commissions from Life Risk Insurance Products

Insurance providers may pay us commissions if your adviser recommends insurance products to you. Commissions are based on a percentage of your insurance premium. These commissions are considered a fee for the advice provided, and we require your informed consent for both initial and ongoing payments. This includes commissions paid on life risk insurance policies that are held within your superannuation fund.

For new policies issued from 1 January 2020, commissions are subject to regulatory caps under the Life Insurance Framework (LIF). These caps apply to the commission amount before the application of GST. The maximum commissions we may receive are:

- Upfront Commission: Up to 60% of the premium in the first year of the policy.
- Ongoing Commission: Up to 20% of the premium in each subsequent year (from year 2 onwards).

These percentages are exclusive of GST. The actual dollar amount of commission will be disclosed in your Statement of Advice.

For insurance products purchased prior to 1 January 2018, we may continue to be paid commissions. These older commissions may also be subject to the new consent requirements where applicable.

Effective 09th July 2025, if we receive commissions related to your life risk insurance product, we are required to obtain your informed consent before accepting these commissions. This consent applies to both initial and ongoing commission payments. We will provide you with clear information about the specific commission amount or range you are consenting to. It is a requirement of the law that your consent, once provided for a life risk insurance commission, is irrevocable. This means that if you provide your consent for us to receive commissions on your life risk insurance policy, those commissions will continue to be paid as per the policy terms, and you cannot later withdraw this consent for that specific commission payment.

Clawback of Commissions

To align our interests with yours, a portion of any upfront commission we receive may need to be repaid to the insurer if your policy is cancelled or the premium is significantly reduced within the first two years. This is known as 'clawback' and is a regulatory requirement under the LIF reforms. The clawback percentages are:

Year 1: 100% of the commission received (if the policy cancels or reduces significantly).

Year 2: 60% of the commission received (if the policy cancels or reduces significantly).

[This repayment is between us and the insurer and does not create a direct financial liability for you to pay us if a policy lapses.](#)

Payment of Advice Fees via Commission & Client Liability

You will always be provided with a clear agreement detailing our professional costs for the advice and services we provide to you. This is your agreed 'advice fee'. Where you choose, and we agree, that your advice fee will be paid to us via commissions received from a product provider (e.g., an insurance company) for a recommended financial product, you will specifically instruct that product provider to pay us the agreed commission amounts on your behalf.

Our ability to receive these commission payments is directly linked to your financial product remaining active and in force. If the financial product policy that is intended to fund your advice fee lapses, is cancelled, or if you elect to change your adviser such that our commission payments cease or are reduced, this means that the product provider will no longer pay us the outstanding portion of your advice fee via commission. In such circumstances, any part of your agreed advice fee that has not been received by us (due to commissions ceasing or being subject to clawback from the product provider) will become a direct liability still owing by you to us. We will provide you with an invoice for any such outstanding balance. *Note: As explained in the 'Commissions from Life Risk Insurance Products' section, your consent for us to receive commissions on a life risk insurance product, once provided, is irrevocable. This clause clarifies your separate obligation to pay your agreed advice fee, irrespective of the ongoing status of commission payments from the product provider.

Other Benefits

We may also receive additional benefits by way of sponsorship of education seminars, conference or training days.

We keep a full register of any benefits received by advisers of between \$100 and \$300. By Law, your Adviser is not permitted to receive benefits in excess of \$300 per year from a product issuer. If you would like a copy of this register, please ask your Adviser and one will be made available to you.

5. What documents you will receive from us

FSG, Adviser Profile and Product Disclosure Statement

If you choose to use our services you will receive the current FSG, Adviser Profile and Product Disclosure Statement ("PDS") where applicable for any relevant financial products discussed. If you invest in an investment strategy without a PDS, then you will receive a written explanation of the investment detailing the strategy (an Information Memorandum or "IM"). Before investing in any financial products, you must also complete an "authority to proceed", as is appropriate in the circumstances. If we recommend you invest in any financial product you must complete the application form attached to the relevant PDS. The PDS contains information about the particular product and will assist you in making an informed decision about acquiring that product.

The PDS will provide you with the information you need to know about the product and details costs and product fees including commissions and is usually created by the financial institution providing the product.

Delivery of Advice

Statement of advice

Once we have met and determined a draft plan for you, we will prepare a statement of advice (SOA). The SOA will be in writing and may be delivered via email, post or in person. Your SOA contains the information needed to understand our advice and the basis on which it is made. It includes information about:

1. The specific advice;
2. The reasons for the specific advice;
3. Any professional costs and fees;
4. Any associations or relationships that may influence the advice;
5. The implementation plan; and
6. Any other relevant matters.

We will also provide other documents as needed. These documents may include educational material or PDS, as discussed above.

Record of advice

Once you have been provided with a SOA further advice may be provided in a form known as a record of advice or "ROA", provided there has been no change in your personal circumstances or the basis of the advice set out in the SOA.

Approved product list

The financial products that will be recommended are limited to those on Boston Reed Pty Ltd.'s approved product list and does not include all available financial products. A copy of the approved product list can be provided to you upon request.

Retention of SOA and ROA

We retain all SOAs and ROAs for at least seven years and you may request a copy of the SOA or ROA at any time within that period. This request may be verbal or in writing.

Implementation of advice

Our statement of advice will contain instructions on how the advice should be implemented. We will work with you to ensure that the advice is properly implemented.

Time Limitations

You should not act on any recommendation after thirty (30) days of the date of the advice without your adviser's written confirmation that our recommendations are still suited to you. No responsibility will be taken for any advice acted on after thirty (30) days without your adviser's separate written confirmation that the advice is still suited to you. We will not be responsible for any losses connected to our advice if it is not implemented by us, if you do not engage us as your adviser or if you cease to engage us as your adviser.

To ensure that the Statement of Advice remains suitable to your needs, we recommend a review and if necessary, a revised plan to be prepared after this time limitation has lapsed.

Your Responsibilities as a Client

As your Adviser, we rely on the information you supply as part of our advice process, as such, it is imperative that the information you provide is current, complete and factual. We will ensure that our advice is in your best interests and is appropriate to you at the time it is provided. However, certain aspects of our advice are largely outside our control and are mainly within your control. Therefore, responsibility for these matters largely remain with you.

You are responsible for ensuring that our advice remains in your best interests and appropriate to you over time. You must notify us in writing immediately should your personal circumstances change or should general economic conditions or legislation change in a way that affects our advice to you.

You are responsible for ensuring your bank account and investment account details including account numbers, passwords and personal identification numbers are kept confidential, are stored safely and not recorded in a form that can be accessed by other persons including access by hacking computers, are not provided to any person, including your adviser, and are changed on a regular basis and at least once a month. You are solely responsible for any losses caused by a misuse of this data by any person, including cyber fraud or any other form of fraud.

You agree that the content of this FSG and your responsibilities contained herein form part of our contract with you.

Anti-money laundering and terrorism legislation

Boston Reed Pty Ltd must verify your identity before we provide any financial services to comply with relevant legislation. To provide you with financial services, you will be required to provide requested identity documents and any other information required to meet the regulatory requirements and any additional requirements of recommended product providers.

6. How We Deal with Complaints

We endeavour to resolve all complaints quickly and fairly.

Boston Reed Pty Ltd provides a dispute resolution services to its clients. This obligation is a key tenet of the consumer protection principles of the Australian Financial Services Licensing system.

If you have a complaint about any services, you should:

1. Contact your Adviser by telephone to explain your situation and let him/her know of your concerns. Your Adviser will do everything possible to resolve your complaint promptly.
2. If this does not resolve your complaint, put your complaint in writing addressed to Compliance Manager, Boston Reed Pty Ltd at PO Box 284 Beaconsfield, Victoria, 3807 where it will be objectively considered and discussed with you and your Adviser with a view to being resolved as soon as possible.
3. If your complaint is not resolved appropriately by Boston Reed Pty Ltd, you can access our external dispute resolution scheme. Boston Reed Pty Ltd is a member of the Australian Financial Complaints Authority (AFCA). AFCA can be contacted on 1800 931 678 or info@afca.org.au. This is a free service to complainants.

7. Any potential conflicts of interest

The SoA or RoA you receive will make reference to any potential conflicts of interest that you need to be aware of when deciding whether to rely on our advice.

8. Our privacy policy

Your personal information is protected by our privacy policy and the privacy laws. This information will not be provided to anyone or used for any other purpose unless this is necessary to comply with the law.

A copy of Boston Reed Pty Ltd and your Adviser's Privacy Policy will be provided to you upon request.

If you are not satisfied with our approach to privacy you are entitled to contact the Office of the Privacy Commissioner who may investigate any complaints you may make.

9. Our compensation arrangements

Boston Reed Pty Ltd has arrangements in place to ensure it continues to maintain Professional Indemnity Insurance. In particular, the Professional Indemnity insurance, subject to its terms and conditions, provides indemnity up to the required regulatory sum insured for Boston Reed Pty Ltd, our Representatives (Advisers) and employees in respect of our authorisations and obligations under our Australian Financial Services License. This insurance continues to provide coverage for financial services work done by your Advisor while engaged with Boston Reed Pty Ltd.

Please do not hesitate to contact your Adviser should you have any questions about your Adviser's services and how your Adviser and Boston Reed Pty Ltd can help you improve your financial position.



Boston Reed Pty Ltd

ABN 89 091 004 885

Unit 6, 68-70 Old Princes Highway, Beaconsfield VIC 3807

PO Box 284, Beaconsfield VIC 3807

Telephone: (03) 7006 5270

Email: info@bostonreed.com.au

ADVISER PROFILE

With years of extensive experience within the financial planning industry and related industries, Thor brings this experience to you in all areas of life insurance advice, wealth accumulation, wealth protection, and retirement planning. This brings a vast amount of knowledge to the Vivid Advisory Pty Ltd team and their clients. Approaching a financial planner can seem daunting at first; however Thor will ensure you have a rewarding and exciting experience. By exploring your current situation and assisting you in discovering what is really important, Thor will help to articulate short, medium and long-term goals that become the foundation of the advice.

Thor has completed the following qualifications:

- Diploma of Financial Services (Financial Planning)
- Self Managed Super Fund Accreditation
- Advanced Estate Planning
- Advanced Investment Planning
- Advanced SOA's & Complex Advice
- Advanced Taxation & Superannuation
- Ethics and Professionalism in Financial Advice – Graduate Diploma
- Client Engagement Skill – Graduate Diploma

Thor is authorised to provide financial product advice and arrange dealings in;

- Investments:
 - Basic and non-basic deposit products;
 - Interests in managed investment schemes including investor directed portfolio services;
 - Securities
- Life products including life investment and life risk insurance products;
- Retirement planning (Retirement savings accounts); and
- Superannuation including SMSF's;

to retail and wholesale clients.

Thor-Bjorn McDowell (AR 410880) and PWM RBI Pty Ltd trading as Vivid Advisory (CAR 1315775) are Authorised Representatives of Boston Reed Pty Ltd (AFS License No 225738), ABN 89 091 004 885.