



Financial Services Guide

Updated: 16 February 2019

This Financial Services Guide (FSG) has been prepared and issued by Bluebird Portfolio Services Pty Ltd ("Bluebird") ABN: 91 620 481 218 | AFSL 503266.

This FSG is designed to provide you with important information to assist you in determining whether to use any of the financial services provided by Bluebird. This FSG will provide you with information about Bluebird and how we can be contacted; what financial services we are authorised to provide to you; how we are remunerated; how we manage conflicts of interest; how we protect your information; and how we manage complaints. We also provide important information you should be aware of in relation to our research reports.

Who will be providing the financial service to me?

Bluebird Portfolio Services Pty Ltd
Australian Financial Services Licence Number: 503266
Principal Place of Business:
Level 3,
533 Little Lonsdale Street
Melbourne, VIC 3000
M: 0403534426
Email: bill.keenan@bluebirdportfolios.com.au
www.bluebirdportfolios.com.au

What kinds of financial services are you authorised to provide me?

Bluebird's AFSL authorises it to provide general financial product advice and deal (by arranging for another person to apply for, acquire, vary or dispose of financial products), to wholesale and retail clients, in respect of the following types of financial products:

- Basic deposit products;
- Government debentures, stocks, and bonds;
- Managed funds, including investor directed portfolio services;
- MDA services;
- Securities; and
- Superannuation and retirement savings accounts.

Bluebird currently provides its clients with general financial product advice via model portfolios, research reports, performance reports and email notes. Our portfolios and research publications are prepared by the principal and any authorised representatives of Bluebird.

Please note that to the extent that any of our publications provide advice, this is general financial product advice only. This means that the advice has been prepared without taking-into-account the investor's investment objectives, financial situation or needs. Before acting on any advice, you should consider the appropriateness of the advice, as well as any additional warnings, disclaimers or qualifications. For further information in relation to our research please refer to the Research Report Disclosure section at the end of this document, or the Research Report Disclosure contained within our research reports.

Our model portfolios, publications and email notes, should be viewed as an additional investment resource, not as your sole source of information. We recommend you obtain appropriate financial, legal and taxation advice before making any financial investment decision.



In addition:

- you should be aware that past performance does not necessarily indicate a financial product's likely future performance; and
- if applicable, before making any decision to acquire a particular financial product, you should obtain and carefully consider the relevant product disclosure statement.

While we will use all reasonable efforts to obtain information from reliable sources, we do not guarantee the accuracy or completeness of that information. Our financial product research may be withdrawn or changed at any time as other information becomes available to us.

How will I pay for the service?

Bluebird offers model portfolios, security research and investment committee support. Clients pay for these services via a quarterly subscription fee or by an agreed portfolio management fee on a managed account platform.

How are Bluebird employees and authorised representatives paid?

All employees of Bluebird receive a salary and are able to participate in any bonus plan relevant to their role, as offered by Bluebird from time to time at its discretion.

Do you receive remuneration, commission, fees or other benefits in relation to providing the financial services to me and how is that commission calculated?

As mentioned above, we only receive fees from you in relation to the particular services you wish to use.

Bluebird DOES NOT charge or accept payment or commissions from fund managers, listed companies, or any other product issuers in relation to, or that is attributable to, the services that we provide to you, nor for the production of our research generally.

How do you manage potential conflicts of interest?

Issuer fees and commissions

Bluebird does not earn fees or commissions from listed companies or product issuers. Bluebird only earns income from its own clients for providing model portfolios and research.

Gifts

Bluebird does not accept any gifts from listed companies or product issuers.

Research coverage

Bluebird holds no bias to any particular sector, company or product issuer. Bluebird always researches the entire investment grade universe when constructing portfolios and providing research reports. Bluebird's investment philosophy and process focuses on quality, value and momentum and this is applied to all investments without bias or conflict.

Staff Trading

No material interests are held by Bluebird or its staff in financial products or securities that are the subject of our research reports. Nonetheless, the principal and staff must maintain a share register of personal and related holdings which are available via <https://www.bluebirdportfolios.com.au/documents>

In addition, the principal and staff must not transact in a security, that is the subject of a Bluebird research reports, for 3 business days before AND after the publishing date. This is to avoid the perception of 'front-running' a research report if acting in-line with the recommendation (e.g. buying the stock just before the research report is released) or acting in conflict with the research report, if acting against the recommendation (e.g. selling stock immediately after recommending clients buy the stock).

As noted, Bluebird's market influence is likely to be minimal but it is still important that the principal and staff are acting in the interests of clients, at all times.



Ownership and associations

Bluebird is 100% owned by the principal and has no associations with listed companies or financial product issuers. Bluebird is proud to offer a non-conflicted service when it comes to providing general securities advice to wholesale and retail clients.

What information do you maintain in my file and can I examine my file?

The privacy of your personal information is important to us. Any personal information we collect such as your name, address, phone, and email details are handled in accordance with our Privacy Policy. Our Privacy Policy outlines how we comply with the requirements of the Privacy Act 1988. A copy of the *Privacy Policy* can be obtained by visiting www.bluebirdportfolios.com.au. You can access personal information in accordance with our Privacy Policy.

Does Bluebird have professional indemnity insurance?

Yes. Bluebird holds a professional indemnity insurance policy in accordance with its obligations under section 912B of the *Corporations Act 2000*.

Who can I contact if I have a complaint about the provision of the financial services to me?

If you are not satisfied with our service please contact the Complaints Manager using the contact details on page 1. We will seek to resolve your complaint promptly and fairly.

If your complaint is not resolved to your satisfaction you have the right to contact the Australian Financial Complaints Authority (AFCA). AFCA is an external dispute resolution scheme authorised to deal with complaints in relation to the financial services industry. AFCA's contact details are:

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001
Telephone: 1800 931 678
Email: info@afca.org.au
Internet: www.afca.org.au

This Publication is a Financial Services Guide for the purposes of section 941A of the *Corporations Act* to the extent that the recipient of the services described in this document is a retail client as defined by the *Corporations Act*; and is issued subject to the laws of the state of Victoria and the Commonwealth of Australia and all matters arising from it or its use shall be subject to the exclusive jurisdiction of the Courts of Victoria.



Bluebird Research Report Disclosures

Currency

Our Research reports are current as at the date on the report until it is replaced, updated or withdrawn. Our financial product research may be withdrawn or changed at any time as other information becomes available to us. These reports will be updated if events affecting the report materially change.

Research Criteria

For further information as to:

- the scope and expertise of our research,
- the process by which products are selected for coverage,
- the filters and research methodology applied, and
- the spread of ratings,

please refer to *Bluebird Investment Philosophy and Process* document on www.bluebirdportfolios.com.au.

Material interests and Conflicts of Interest and how we manage them in relation to research

Bluebird, its staff and associates do not receive any direct benefit from the publication of our research reports. Bluebird does not receive commissions for providing research and does not charge companies to be rated. Our conflicts of interest policy is outlined above in this FSG. Current shareholdings of the Principal and staff are disclosed via this link

<https://www.bluebirdportfolios.com.au/documents>

Reasons for our opinion and recommendation

The opinions and recommendations in our research reports are based on a reasonable assessment by the Bluebird analyst of top-down (macro-economic) and bottom-up (company) information that is generally available in the market. Our research staff:

- are well-qualified and experienced;
- exercise due care and skill in assessing the information available to them; and
- give their opinions and recommendations on reasonable grounds.