

## Financial Services Guide

Issued 1 July 2023

The financial services referred to in this Financial Services Guide (FSG) are offered by:

**Triton Broking Services (WA) Pty Ltd trading as Aviso WA** (ABN 30 009 439 203) (AFSL 230778) (**Aviso WA**)

4th Floor, The Professional Centre, 9 The Avenue, Midland, WA, 6056

P. 08 6274 0500

F. 08 9250 5617

E. [team@avisowa.com.au](mailto:team@avisowa.com.au)

Web: <https://avisowa.com.au/>

### **Lack of Independence**

We are not independent, impartial, or unbiased because we or our representatives or associates may:

- receive remuneration or other gifts or benefits from the issuer of the product you buy (e.g., commission that we retain); or other third parties for related services provided in connection with the personal advice service (e.g., premium funding claims or loss adjusting or reinsurance services);
- be subject to direct or indirect restrictions relating to the financial products in respect of which personal advice is provided; or
- provide advice or recommend products issued by entities with indirect ownership links to Aviso WA which may reasonably be expected to influence the personal advice provided to you.

For more information, refer to the sections in this document entitled:

- "What relationships or associations do you have?"
- "How do we manage conflicts of interests?" and
- "How are we remunerated for the services provided?"

It is important to note that when providing personal advice, we are required under the Corporations Act to always act in our client's best interests. Our Conflicts of Interest Policy details how we manage conflicts of interest in relation to our services. Access to our Conflicts of Interest Policy is available upon request.

**This FSG sets out the services that we can offer you. It is designed to assist you in deciding whether to use any of those services and contains important information about the remuneration we receive, our professional indemnity insurance, and how any complaints you may have will be handled.**

By engaging, or continuing to engage, us you are, in the absence of any formal written agreement with us, agreeing to the delivery of our services and remuneration as described in this FSG. The agreement between us containing terms described in this document will be binding as soon as we perform services for you after the date you receive this document, unless you notify us otherwise in writing. This agreement continues from that time until we notify you that we wish to terminate this agreement, or you advise us that you are terminating our engagement as your broker.

### **Who are we?**

Triton Broking Services (WA) Pty Ltd trading as Aviso WA (ABN 30 009 439 203) is authorised to provide financial services as a general insurance broker under our Australian Financial Services Licence (AFSL No. 230778). Collectively referred to in this FSG as 'Aviso WA', 'we', 'us', or 'our'.

Envest Pty Ltd (ACN 610 997 138) (Envest) has a minority interest in Triton Broking Services (WA) Pty Ltd. Triton Broking Services (WA) Pty Ltd is a Steadfast Group Limited (Steadfast) Network Broker. We are also a member of the Aviso Group Pty Ltd (Aviso Group). For more information refer to the section entitled "What relationships or associations do we have?" in this FSG.

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We offer a wide range of insurance products covering business, personal and specialist insurance and can negotiate with insurers, on your behalf, to deliver tailored coverage at competitive premiums.

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**How can you provide us with instructions?**

In order for us to act on your behalf you must provide us with instructions and other information about the services you require. You can give us instructions using the contact details at the top of this FSG. In some circumstances it may be necessary for you to give us instructions in writing. We will tell you when this is the case.

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**Who is responsible for the financial services provided?**

**Aviso WA** is responsible for the financial services that will be provided to you, including the distribution of this FSG.

Aviso WA holds a current Australian Financial Services License (no. 230778).

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**What financial services do we provide?**

Aviso WA is authorised to:

- deal in (including to issue and arrange for others to deal in), and provide personal and general advice concerning general insurance products; and
- Provide claims handling and settling services to wholesale and/or retail clients.

We will do this for you as your broker unless we tell you otherwise. We will seek quotes from the broader general insurance market before making a recommendation.

When providing claims handling and settling services we will:

- act as your advocate and keep you informed as to the progress of your claim;
- ensure any claims documentation, insurance company settlement cheques and other information received by us on your behalf will be provided to you as soon as reasonably practicable;
- explain the reasons for the insurer's decision and provide information about what further steps can be taken including how to make a complaint;
- not accept an insurance company settlement or agree to something on your behalf without your consent.

When we act under a claims handling authority granted to us by the insurer, which is relevant to your claim, and exercising that claims authority may be a conflict of interest, we will contact you in a timely manner, explain to how we will manage that conflict and take reasonable steps to ensure that the claim is managed in your best interests. We will seek your consent to continuing to act in relation to the claim.

We have arrangements with a number of Australian insurers and underwriting agencies including underwriters at Lloyd's of London, which enables us to find the right insurance product for you.

Some of the underwriting agencies that offer insurance products that we may recommend are part of the Envest company group (see below) as Aviso WA. Those agencies act as an agent of the insurer and not on your behalf. Wholesale brokers are intermediaries who have access to certain insurance facilities. The agencies and brokers include Allstate insurance Pty Ltd, Blue Zebra Insurance Pty Ltd, ATL Insurance group Pty Ltd, RedSky Insurance Pty Ltd, Point Underwriting Agency Pty td, PI Plus Insurance (PIP) (Aust) Pty Ltd, Ukawa Pty Ltd (SGUA), Aster Underwriting Pty Ltd, Wymark Insurance Brokers (Melb) Pty Ltd, Wellington Underwriting Agencies Pty Ltd, All Parks Insurance Pty Ltd, Epsilon Insurance Broking Services Pty Ltd (ABN 68 097 402 134) T/as Epsilon Underwriting Agencies.

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**What is our relationship to you?**

As general insurance brokers, we normally act as your agent when dealing with insurers. When engaged by you to act as your insurance broker, we have a duty to act in your best interests. When you do business with us, you may deal with our employees, or one of our "Authorised Representatives" or "Distributors".

Authorised Representatives are third parties whom we have authorised to provide financial services on our behalf. When you are dealing with one of our Authorised Representatives,

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their name, contact details and authorised representative number will be disclosed in the document attached to this FSG.

Distributors are third parties who we have authorised to deal in specific insurance products on our behalf. They can only provide factual information and are not authorised to provide any advice.

Our Authorised Representatives and Distributors are not employees of Aviso WA.

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**Will you receive tailored advice?**

Not in all cases. However, we may need information about your personal objectives, details of your current financial situation and any relevant information, so that we can arrange insurance policies for you, or to give you advice about your insurance needs. We will ask you for the details that we need to know.

If we provide you with personal advice, we will review and consider your individual circumstances before providing our advice. We may also provide you with a Product Disclosure State (PDS) and/or policy wording and a Statement of Advice (SOA) or an advice letter (record of advice) (if required).

If we provide you with general advice we may give an opinion about a product which is not based on a detailed consideration of your individual needs, objectives or financial situation. When giving general advice, we will give a warning that you should read the relevant PDS and/or policy wording in full and consider whether the insurance product in question is appropriate for your circumstances.

Where we provide you with advice about your insurance arrangements, that advice is current at the time that we give it. We will review your insurance arrangements when you inform us about changes in your circumstances.

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**Do we provide an invoice?**

We will invoice you for the premium (which may include our commission), relevant statutory charges (including GST) and any fee we charge you for arranging your insurance cover. You must pay us by the due date shown on the invoice.

Your payment of the invoice issued is treated as acceptance of all of the terms and conditions of the associated insurance policy.

Once you have paid an invoice, we hold the premium you pay on trust for you until we pass it on to the insurer. If there is any delay between you paying an invoice and us passing your premium on to the insurer, we may retain any interest earned on the premium during that period. Where a premium remains unpaid, an insurer may have the right to cancel the policy and you may not be insured. The insurer may also charge a premium for the time on risk.

If the premium remains unpaid, your broker is required by law to contact the insurer and the insurer may cancel your policy.

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**How are we remunerated for the services that we provide?**

Type	Amount
Commission paid by insurer	<p>We usually earn a commission from the insurer when we place your insurance.</p> <p>The amount is calculated as a percentage of the premium (including government fees or charges) and is included in the premium quoted to you.</p> <p>Depending on the insurance product, our commission ranges from 0% to 30% of the insurer's base premium (i.e. premium excluding stamp duty, fire services levy, GST or any other government taxes, fees or levies).</p> <p><b>Commission Example:</b></p>

	<p>Base Premium \$100.00</p> <p>Fire Services Levy \$ 30.00</p> <p>GST \$ 13.00</p> <p>Stamp Duty \$ 7.00</p> <p><b>Total Premium \$150.00</b></p> <p>Total Commission Received by Aviso WA (assuming insurer paid a commission rate of 15%) \$ 15.00</p>
Commission paid by premium funder.	<p>If we arrange premium funding for you, we may be paid a commission by the premium funder. We may also charge you a fee (or both). The commission that we are paid by the premium funder is usually calculated as a percentage of your insurance premium (including government fees or charges). If you instruct us to arrange or issue a product, this is when we become entitled to the commission.</p> <p>Our commission rates for premium funding are in the range of 0 to 5% of funded premium. When we arrange premium funding for you, you can ask us what commission rates we are paid for that funding arrangement compared to the other arrangements that were available to you. The amount of our commission and any fee that we charge will set out in the premium funding contract.</p>
Broker Fee paid by you	<p>We may charge a broker fee when we place your insurance. The amount of any fee we charge may typically vary from 0% to 30% of your insurance premium depending on the complexity of your insurance needs and the size of your account with us.</p> <p>The brokerage fee will be detailed on your invoice and provided to you at the time you receive advice or as soon as practical after that.</p>
Referral fees paid to third parties by us	<p>If you were referred to us by a third party, we may pay the referrer a referral fee. This fee is calculated as a percentage of the fees and commission earned from the referral and can be up to 0% to 50% of the fees and commissions we receive. This is a separate payment that we make to the referrer and does not increase the amount you pay for your insurance cover.</p>
Employee salaries paid by us	<p>Our employees are paid an annual salary and may receive a bonus based on our performance criteria.</p>
Other remuneration	<p>As a Steadfast Network Broker, we have access to member services including model operating and</p>

	<p>compliance tools, procedures, manuals and training, legal, technical, banking and recruitment advice and assistance, group insurance arrangements, product comparison and placement support, claims support and group purchasing arrangements. These member services are either funded by Steadfast, subsidised by Steadfast or available exclusively to Steadfast Network Brokers for a fee.</p> <p>While providing services to you, we may also receive non-monetary remuneration from insurers, underwriting agencies or other third parties. This can include access to technology platforms and IT support, education and training, event sponsorship, and marketing assistance. We do not accept non-monetary remuneration if this could reasonably be expected to influence the services that we provide to you.</p>
<p>Provision of Personal Advice</p>	<p>If we provide personal advice, we will inform you of any fees, commission, benefits, bonuses, payments to third parties or other remuneration which will be paid or received in relation to the policies that are the subject of the advice (if you accept it). This information will be provided at the time the advice is provided or as soon as practical after that time.</p>

**What is the cost of early cancellation and varying insurance?**

Our remuneration is payable on the terms of our invoice and is considered fully earned at the time that we issue the invoice. If your insurance contract is cancelled or varied before the expiry of the period of insurance, you will be paid any refunded pro-rata premium received from the insurer (less the commission & broker fees paid to us).

We will retain all of our commission, fees and other remuneration in full in the event of any early cancellation or variation of your insurance contract or adjustment of premium. We may charge an additional fee for processing your request to cancel or vary your insurance contract and you agree that this fee may be offset against any premium refund you are entitled to.

**What relationships or associations do we have?**

**Envest**

We are part of a group of companies owned by Envest Pty Ltd (ACN 610 997 138) (Envest). Envest is a focused insurance distribution business that leverages the power of our people to deliver creative solutions for customers and partners in Australasia. Envest also has majority and minority interests in related service providers such as insurance broking, underwriting agencies (on behalf of local and overseas insurers) and claims administration.

Your broker may recommend, refer you to or advice you to use, the services of other companies in the Envest group of companies. We will only do this if it is appropriate for you and in your best interests to do so.

**Aviso Group**

Aviso WA is member of the Aviso Group Pty Ltd (Aviso Group), which is comprised of multiple brokers Australia wide who together form the national broking group.

**Steadfast**

Aviso WA is a Steadfast Group Limited (Steadfast) Network Broker. Steadfast Group Limited (Steadfast) is a public company that operates a large network of insurance

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brokerages in Australia known as Steadfast Brokers.

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**What is the renewal process?**

We will contact you before your existing policy expires to send you a renewal information pack. This information describes any next steps to be taken before your policy expires. We will contact you using the details that we have on file for you to discuss your requirements for renewal of your insurances including whether to seek terms from other insurers.

If prior to the expiry of your insurance we have taken reasonable steps to contact you and we are unable to obtain instructions, you authorise us to renew your existing policy with your current insurer as per expiring policy details to make sure that you remain protected.

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**How do we manage Conflicts of Interests?**

We will contact you in a timely manner if we identify that there is or is likely be a conflict of interest in us providing services to you. We will suggest steps to manage the conflict in your best interests and will only continue to provide services to you with your consent.

Where there are potential conflicts of interest in our remuneration arrangements or in our dealings with related parties, they are managed in accordance with our Conflicts of Interest Policy which all staff and representatives must comply with. If we cannot provide services to you due to a conflict of interest that cannot be managed, we will notify you immediately.

The entities listed below are underwriting agencies and wholesale brokers which Envest has an interest in. We may place your insurance through one of these entities. Any placement will be on arm's-length terms but in affecting the contract of insurance the underwriting agencies and wholesale brokers may be acting under a binding authority granted by the insurer. We will receive commission from these underwriting agencies' and wholesale brokers insurer partners as payment for the placement of the policy.

Allstate insurance Pty Ltd, Blue Zebra Insurance Pty Ltd, ATL Insurance group Pty Ltd, RedSky Insurance Pty Ltd, Point Underwriting Agency Pty td, PI Plus Insurance (PIP) (Aust) Pty Ltd, Ukawa Pty Ltd (SGUA), Aster Underwriting Pty Ltd, Wymark Insurance Brokers (Melb) Pty Ltd, Wellington Underwriting Agencies Pty Ltd, All Parks Insurance Pty Ltd, Epsilon Insurance Broking Services Pty Ltd (ABN 68 097 402 134) T/as Epsilon Underwriting Agencies.

We refer you to the Envest website for further details on all related companies at <https://envest.com.au/>

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**What should you do if you have a complaint?**

If you are concerned about the services provided by us, any product we have arranged, our interactions with you or how we have handled your Personal Information, please contact your broker.

We will acknowledge your complaint in writing or by telephone within 1 business day, or as soon as practicable, we will take all reasonable steps to ensure that the person to whom your complaint relates does not handle your complaint.

If, within 5 days, your broker is unable to resolve your complaint to your satisfaction, the matter will be referred to our complaints officer who can be contacted directly on 08 6274 0500. We will try to resolve your complaint quickly and fairly.

We will then investigate the matter and attempt to resolve your complaint in accordance with our Disputes and Complaints Handling Management Policy. We will advise you of the outcome of our review of your complaint within 30 days of when you first made your complaint.

Aviso WA is a member of the Australian Financial Complaints Authority (AFCA). If your complaint cannot be resolved to your satisfaction by us, you have the right to refer the matter to the AFCA.

AFCA is an independent external dispute resolution body approved by the Australian Securities and Investment Commission. AFCA resolves disputes at no charge to you and has the authority to deal with certain financial services disputes within its Terms of Reference. AFCA can be contacted:

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In writing to: Australian Financial Complaints Authority,  
GPO Box 3, Melbourne, VIC, 3001  
By phone: 1800 931 678 (free call)  
By email: [info@afca.org.au](mailto:info@afca.org.au)  
By visiting: [www.afca.org.au](http://www.afca.org.au)

If you think we may have breached the Code; you can report alleged breaches to the Insurance Brokers Code Compliance Committee (IBCCCC). You can contact the IBCCC using the following details:

Website: [www.insurancebrokerscode.com.au](http://www.insurancebrokerscode.com.au)  
Email: [info@codecompliance.org.au](mailto:info@codecompliance.org.au)  
Telephone: 1800 931 678 (free call)  
In writing to: IBCCC  
P.O. Box 14240, Melbourne VIC 8001

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**What arrangements do we have in place to compensate clients for losses?**

Aviso WA has a professional indemnity insurance policy (**PI policy**) in place.

The PI policy covers us and our representatives (including our authorised representatives) for claims made against us and our representatives by clients as a result of the conduct of us, our employees or representatives in the provision of financial services.

Our PI policy covers us for claims relating to the conduct of representatives who no longer work for us.

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**Member of the NIBA and subscriber to NIBA Code of Practice**

Aviso WA are members of the National Insurance Brokers Association (NIBA) and are bound by their Code of Conduct. We also subscribe to the General Insurance Brokers Code of Practice (the Code), a full copy of which is available from the [National Insurance Brokers Association \(NIBA\) website](http://www.niba.com.au/insurance-brokers-code-of-practice/).

The Code sets out standards for brokers to follow when dealing with clients. A copy of the code can be provided upon request or obtained from the NIBA website: [www.niba.com.au/insurance-brokers-code-of-practice/](http://www.niba.com.au/insurance-brokers-code-of-practice/).

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**What if you need special assistance?**

We will take all reasonable steps to ensure our services are accessible to clients with special needs. Please let us know if you are experiencing any vulnerability when engaging our services, for example relating to your age, disability or mental or physical health conditions.

If you tell us or we identify that, due to your vulnerability, you need additional support or assistance, we will work with you as soon as possible to find a suitable way to provide our services to you. During this time, we will of course respect your right to privacy and self-advocacy. If your circumstances mean that you need third-party support (such as a lawyer, interpreter or friend), we will work with you to allow for this when providing our services.

For further information please refer to our [website](#).

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**Any questions?**

If you have any further questions about the financial services Aviso WA provides, please contact your broker, send us an email at [team@avisowa.com.au](mailto:team@avisowa.com.au).

Please retain this document for your reference and any future dealings with Aviso WA.

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**What do we do with your personal information?**

We maintain a record of your personal profile, including details of insurance policies that we arrange for you. We may also maintain records of any recommendations or advice given to you. We will retain this FSG and any other FSG given to you as well as any SOA, Letter of Advice (Record of Advice) or PDS that we give or pass on to you for the period required by law.



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From time to time and where we are permitted by law to do so, we may also use or disclose your Personal Information for the purpose of marketing our services, or the products and services of related entities and third parties, to you. Please tell us if you do not want us to use or disclose your Personal Information for marketing purposes by contacting our privacy officer by phone on 08 6274 0500, via mail to 4th Floor, The Professional Centre, 9 The Avenue, Midland, WA 6056 or email [team@avisowa.com.au](mailto:team@avisowa.com.au).

For detailed information about how we handle your Personal Information, please see our Privacy Policy which is available on request. A copy is also available on our website <https://avisowa.com.au/>.

Our Privacy Policy also contains information about how you may access, update and correct the Personal Information you have provided to us or how you may make complaints in relation to the handling of your Personal Information and how we will deal with your complaint.

If you wish to look at your file, please ask us. We will make arrangements for you to do so.

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**How are changes to this FSG communicated?**

Information in this document may change from time to time. We may make such changes by amending the FSG and publishing an updated version on our website. You may also obtain a printed copy of the updated information by contacting your broker, emailing us at [team@avisowa.com.au](mailto:team@avisowa.com.au) or calling 08 6274 0500

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## Authorised Representative Details

Issued 1 July 2023

This document forms part of, and should be read in conjunction with, the Triton Broking Services (WA) Pty Ltd t/a Aviso WA (ABN 30 009 439 203) (AFSL 230778), (Aviso WA) Financial Services Guide (FSG). Together, these documents provide details of the services that we can provide, on whose behalf we act when providing those services, information about the remuneration we may receive and how we handle any complaints you may have.

### Financial services provided

Just Mary Pty Ltd ('we', 'us' or 'our') is authorised by Aviso WA to issue, advise and deal in general insurance products to wholesale and/or retail clients.

### Fees and commissions

We usually earn a commission from the insurer when we place your insurance. The amount is calculated as a percentage of the premium (including government fees or charges) and is included in the premium quoted to you.

Depending on the insurance product, our commission ranges from 0% to 30% of the insurer's base premium (i.e. premium excluding stamp duty, fire services levy, GST or any other government taxes, fees or levies).

### Referral fees and other associations or relationships

If you were referred to us by a third party, we may pay the referrer a referral fee. This fee is calculated as a percentage of the commission earned from the referral and can be up to 0% to 50% of the commissions we receive. This is a separate payment that we make to the referrer and does not increase the amount you pay for your insurance cover.

## Contact Details

### Authorised Representative

Just Mary Pty Ltd  
Corporate Authorised Representative number 000394940

Justin Collins  
Authorised Representative number 001281693

Address:  
127 Urch Road, Narra Tarra WA 6532

Phone: 08 6274 0500  
Email: [justinc@avisowa.com.au](mailto:justinc@avisowa.com.au)  
Web: <https://avisowa.com.au/>

### Australian Financial Services Licensee

Triton Broking Services (WA) Pty Ltd t/as Aviso WA  
(ABN 30 009 439 203) Australian Financial Services  
Licence No. 230778

Address:  
Level 4, 9 The Avenue, Midland WA 6056

Phone: 08 6274 0500  
Email: [team@avisowa.com.au](mailto:team@avisowa.com.au)  
Web: <https://avisowa.com.au/>

