

Financial Services and Credit Guide

CPS Private Wealth Management Pty Ltd

This Financial Services and Credit Guide (FSCG) contains information that will help you decide whether to use the financial services we offer. It sets out:

- who we are and how we can be contacted
- the advice and services we provide
- information about our licensee, AMP Financial Planning Limited (AMP Financial Planning)
- our fees and how we, and AMP Financial Planning are paid in connection with those services
- how we manage your private information
- how you can complain about a matter relating to us or AMP Financial Planning

Documents you may receive

We will provide you with a number of documents as you progress through our financial planning process to capture each stage of your advice journey. We may provide these documents to you electronically to your nominated email address, unless otherwise agreed.

When we provide personal advice it will normally be documented and provided to you in a Statement of Advice (SOA), known as a financial plan. The financial plan contains a summary of your goals and the strategies and any financial products we may recommend to achieve your goals. It also provides you with detailed information about product costs and the fees and other benefits we and others will receive, as a result of the advice we have provided.

If we provide further personal advice a financial plan may not be required. We will keep a record of any further personal advice we provide you for seven years. You may request a copy of such records by contacting our office during that period.

When we provide credit advice we will conduct a preliminary assessment to determine the suitability of a particular product. This is normally documented and provided to you in a Record of debt advice or a Credit Proposal. We will retain a record of the debt advice or Credit Proposal which you may request by contacting our office within seven years of the assessment. We will only provide recommendations to apply for a particular credit contract with a certain lender or increase the credit limit of a particular credit contract where the contract meets your needs and objectives and is not unsuitable to your circumstances.

If we recommend or arrange a financial product for you we will provide a product disclosure statement (PDS) or investor directed portfolio service (IDPS) guide where relevant. These documents contain the key features of the recommended product, such as its benefits and risks as well as the costs you will pay the product provider to professionally manage that product. You should read any warnings contained in your advice document, the PDS or IDPS guide carefully before making any decision relating to a financial strategy or product.

About our practice

Summary of the business

Name	CPS Private Wealth Management Pty Ltd as Trustee of the The Trustee of the S2F Financial Solutions Unit Trust
Australian Business Number	91 831 480 764
Australian Company Number	113 724 913
Authorised representative number	289744
Credit representative number	386070

Our office contact details

Address	Level 1, 570 President Avenue Sutherland NSW 2232
Phone	02 9906 3222
Email	clientservices@cpsprivatewealth.com.au
Website	www.cpsprivatewealth.com.au

This guide provides information about our advisers including their contact details, qualifications, experience, the services they may offer and financial products they can provide advice on.

Our advice and services

We can provide you with personal and general advice about specific services and financial products listed below. We can also arrange for financial products to be issued without advice from us.

Individual advisers within our practice may not be qualified to provide advice in all of the services and products noted below. Their individual profile guides will note any limitations to the advice they are qualified to provide. At all times we will ensure the appropriate adviser is available to you to provide advice consistent with your goals.

The following table sets out the areas of advice we can help you with as well as the products and services we can arrange.

Any additional advice or services we can offer you, or limitations to the list below, will be outlined in **Our financial advisers and credit advisers** on page 13.

We can provide advice on	We can arrange the following products and services
<ul style="list-style-type: none">— Investments strategies (strategic asset allocation and goals based investing)— Budget and cash flow management— Debt management (including borrowing for personal and investment purposes)— Salary packaging— Superannuation strategies and retirement planning— Personal insurance— Estate planning— Centrelink and other government benefits— Aged care	<ul style="list-style-type: none">— Superannuation, including retirement savings accounts— Self-managed superannuation funds (SMSF)— Borrowing within your SMSF— Employer superannuation— Managed investments— Investor directed portfolio services (for example, administration platforms)— Deposit and payment products (for example term deposits, cash management accounts and non-cash payment products)— Standard margin loans— Retirement income streams, including pensions and annuities— Personal and group Insurance (life cover, disability, income protection and trauma)— Life investment products including whole of life, endowment and bonds— Arranging for listed securities, shares and debentures to be bought and sold via a platform and broker— Limited selection of investment guarantees

AMP Financial Planning maintains an approved products and services list from a diversified selection of approved Australian and International providers, including companies related to AMP Financial Planning. These have been researched by external research houses as well as our in-house research team.

AMP Financial Planning periodically reviews these products to ensure that they remain competitive with similar products that address similar client needs and objectives. Generally, we recommend products that are on the approved products and services list. However, if appropriate for your needs, we may, subject to AMP Financial Planning's approval, recommend other products.

A copy of the approved products and services list can be supplied to you upon request.

If we recommend a new platform or portfolio administration service, we use those approved by AMP Financial Planning. These services may include those issued by companies related to AMP Financial Planning.

As at November 2020, the lenders whose products are most commonly recommended by accredited mortgage consultants authorised by AMP FP are AMP Bank, Commonwealth Bank, Macquarie Bank, AFG Home Loans, NAB and ANZ.

Tax implications of our advice

Under the Tax Agent Services Act 2009, CPS Private Wealth Management Pty Ltd is authorised by the Tax Practitioners Board to provide tax (financial) advice services on matters that are directly related to the nature of the financial planning advice provided to you. We will not consider any other tax matters in our advice to you. Where tax implications are discussed they are incidental to our recommendations and only included as an illustration to help you decide whether to implement our advice.

Transaction services

We can arrange to complete transactions for you on limited types of financial products where we can take your instructions and arrange for the transaction to be completed, without providing personal advice. If you wish to proceed without our advice, we will ask you to confirm your instructions, which will be documented in writing. We will keep a record of this documentation for seven years. You may request a copy of such records by contacting our office during that period.

Your relationship with us and using our services

You can contact us directly with any instructions relating to your financial products. This includes giving us instructions by telephone, mail or email. We can only accept your instructions via email once you have signed an authority form.

We will work with you to agree what advice and services we will provide and when and how often we will provide them.

Where you agree to annual advice and services, the details will be documented and provided to you in an advice or service agreement. This includes the frequency of contact between us, service standards that may apply, any fee arrangements and how the agreement can be terminated.

If at any time you wish to terminate your relationship with us, please contact us using the details shown in this guide.

Changing service providers

To ensure that you are provided at all times with ongoing servicing to meet your financial needs, we may transfer our rights and obligations under our servicing arrangement with you to another adviser or financial planning practice within the AMP network or to another AMP licensee (the new service provider). If we do this, the new service provider will provide the servicing to you and will be entitled to the agreed fees. The new adviser will also take over the rights and obligations on the same terms and conditions set out in the servicing arrangement and we will be released from those rights and obligations. We will write to you in advance of a transfer occurring, to introduce your new service provider. You may notify your new service provider at any time if you want to vary or end your servicing arrangements.

Providing information to us

It is important that we understand your circumstances and goals, so that we can provide you with appropriate advice and services. You have the right not to provide us with any personal information. Should you choose to withhold information, or if information you provide is incomplete or inaccurate the advice or services we provide you may not be appropriate for you.

It is also important that you keep us up to date by informing us of any changes to your circumstances so we are able to determine if our advice continues to be appropriate.

Our fees

The actual fee charged to you will depend on the nature of the advice or service we provide. We will discuss and agree the actual fees with you before we proceed. The following section outlines the types of fees that may apply:

The fees charged for our advice and services may be based on a combination of:

- A set dollar amount; or
- A percentage based fee.

Our agreed advice and service fees may include charges for:

- Initial advice
- Ongoing or annual advice and services.

Please note that for services in relation to insurance, banking deposit products, some loan products and older investment products, commissions may be paid by the product provider as follows:

- Initial commission - a percentage of the value of your investment contributions, loan balance or insurance premiums; and
- Ongoing commission - a percentage of the value of your investment balance, outstanding loan amount or premiums, usually calculated at the end of each month in which you hold the investment or loan, or on renewal of insurance products.
- From 1 January 2021, most benefits given under existing grandfathered arrangements for conflicted remuneration in relation to financial product advice provided to retail clients will cease.

Payment methods

We offer you the following payment options for payment of our advice and service fees:

- BPAY, direct debit (savings), credit card or cheque; and
- Deduction from your investment (subject to the advice and service provided).

All permissible fees and commissions will be paid directly to AMP Financial Planning as the licensee. They retain a percentage (as a licensee fee) to cover their costs and the balance is passed on to us. The percentage is determined annually, based on a number of factors, including our business revenue over a 12 month period.

For more information on our services, please see our **Schedule of fees** attached or available on request.

Fixed service fees

We offer the following services at these fees:

Service	Fee
Fee for Service - Advice Review Individual	From \$1,850
Fee for Service - Advice Review Couple	From \$2,000
Fee for Service - Transition to Retirement Refresh Strategy Review	From \$4,450
Fee for Service - Travel to Appointments	From \$275
Fee for Service - CBD Appointments	From \$275
Fee for Service - Portfolio Review	From \$1,650
Fee for Service - Other Customised	Quote will be provided

Other costs

Where other costs are incurred in the process of providing our advice and services to you, you will be liable for these costs. However, we will agree all additional costs with you prior to incurring them.

Other benefits we may receive

The following are monetary and non-monetary benefits we may receive other than those explained above. These are not additional costs to you.

In addition to the payments we may receive for our advice and services, we may receive other support services or recognition from the licensee to help us grow our business. This could include education or training support, badging rights, technology, financing, events or other recognition we are eligible for. These benefits such as prizes, awards, events may be given to us in recognition of financial planning excellence or innovation including if we qualify under the licensee's excellence program, or for business operational costs. These benefits are paid either at the licensee's discretion or depending on meeting certain qualifying criteria including the quality of our services and advice provided to our clients. We may receive benefits from product issuers that may include non-monetary benefits that are valued at less than \$300. We may also participate in business lunches or receive corporate promotional merchandise tickets to sporting or cultural events and other similar items.

Development, management and advice (DMA) run off payments

Eligibility to receive DMA run off payments is dependent on us continuing to be authorised by and meeting standards set by AMP Financial Planning. From 31 January 2020 we will be eligible to receive run off payments based on the amount of advice revenue we generated in 2018. Advice revenue includes revenue directly attributable to advice provided to a client for an agreed fee. It excludes commissions from investment, insurance and banking products. These payments are to assist with our cashflow over 3 years as set out in the table below. Run off payments will not be made after January 2023.

Year	Total annual amount
2020	\$108,900.00
2021	\$72,600.00
2022	\$36,300.00

Business buy-back option

If we leave the financial services industry or can no longer appropriately service a selection of our clients, AMP Financial Planning will either look after our clients or appoint you to another adviser or financial planning practice within the AMP network.

If this happens, AMP Financial Planning makes available a facility for practices to transfer the servicing rights of their clients. The valuation will vary depending on certain factors including the annual recurring revenue of our practice and the level of our service standards.

Personal and professional development

AMP Financial Planning offers education, personal and professional development opportunities to our practice on an annual basis. Participation in these opportunities may be based on attainment of qualifying criteria or open eligibility.

Education and professional development

AMP Financial Planning may subsidise the cost of our participation in approved education and professional development programs if we meet specific qualification criteria. The qualifying criteria is based on a combination of factors including the quality of our services, our business goals and our ranking against other practices in AMP Financial Planning. The maximum amount of this subsidy is \$12,000 per annum per practice.

Qualification for this subsidy ceased on 31 December 2018. Any subsidy we earned prior in 2018 is available to us until 31 December 2020.

Provided we meet specific qualification criteria AMP Financial Planning will support the practice with up to 20% of the licensee fees payable by the practice to the licensee in 2017 to meet the training and education requirements for financial advisers as required by Financial Adviser Standards and Ethics Authority. We may also be eligible for education or training support to assist with the development of advisers in our practice. This support may be dependent on a number of factors including the experience of the adviser and their tenure at our practice.

Both the subsidy and support mentioned above are paid by AMP Financial Planning directly to the education provider and not to us.

Amicus program

In addition to the above, certain practices that meet additional qualification criteria may be eligible to participate in the Amicus program, an additional personal and professional development program organised by AMP Financial Planning. If a practice qualifies for the Amicus program, AMP Financial Planning may subsidise the cost of their participation.

Placement fees

From time to time AMP Financial Planning will receive fees from brokers or product issuers (including AMP group companies) for arranging client participation in Initial Public Offerings (IPOs) of financial products. The fee, which is generally a percentage of the fee paid to the broker, varies from offer to offer and by the level of participation by AMP Financial Planning. We may share in this fee based on the level of participation by our clients.

Relationships and associations

It is important that you are aware of the relationships that AMP Financial Planning has with providers of financial services and products as they could be seen to influence the advice you receive.

About our licensee

AMP Financial Planning Pty Limited

ABN 89 051 208 327

Australian Financial Services Licensee and Australian Credit Licensee

Licence No: 232706

AMP Financial Planning has:

- Approved the distribution of this guide
- Authorised us to provide advice and other services as described in this guide
- Authorised us to provide credit assistance services to you

AMP Financial Planning's registered office is located at 33 Alfred Street, Sydney, NSW 2000.

About the AMP Group

AMP Financial Planning is a member of the AMP group of companies. We can provide advice on products from a wide range of financial product providers, some of which are related or associated with AMP Financial Planning, namely:

- | | |
|---|--|
| — NMMT Limited | — AMP Superannuation Limited |
| — AMP Bank Limited | — ipac asset management limited |
| — SMSF Administration Solutions Pty Ltd | — Multiport Pty Limited |
| — AMP Capital Investors Limited | — AMP Capital Funds Management Limited |
| — Australian Securities Administration Limited (ASAL) | — Cavendish Superannuation Pty Ltd |
| — National Mutual Funds Management Limited | — SuperConcepts Pty Ltd |
| | — N.M. Superannuation Pty Limited |

If we recommend a product issued by the AMP Group or a third party product issuer, they will benefit from our recommendation by receiving product, administration and investment fees, as well as fees paid by fund managers to distribute their product. These fees are all disclosed in the relevant PDS or IDPS guide.

Authorised representatives and/or staff employed in our business may hold shares in AMP Limited, whose share price may be favourably affected by the sale of products issued by AMP Group companies.

AMP Financial Planning's relationships with other companies

AMP Services Limited (ASL) provides administration services and distribution infrastructure services to several issuers of financial products and loan products under agreements entered into prior to 1 July 2013.

In return for those services, ASL receives remuneration as set out below:

- For investment products and loan products – up to 0.33%* p.a. of funds under administration, the balance of any relevant cash account or the total loan value outstanding.

* includes GST

By way of example:

- If total funds under administration for a particular investment product is \$10 million, ASL would receive \$33,000.

This arrangement will cease with effect from 1 January 2021.

From time to time, ASL may facilitate access to AMP Financial Planning and its authorised representatives for issuers to train or educate AMP Financial Planning and its authorised representatives on their products.

Arrangements with platform providers

This section of the FSCG sets out our relationships with platform providers and how these may influence the advice we give you.

Overview

Where you invest through platform products and services (such as investor directed portfolio services or IDPS), we may receive remuneration from those platform providers. Fees, commission payments and other benefits may be calculated as a percentage of your financial interest in a product or service or on the total amount of business advised. The amount and calculation of those fees are shown in the relevant disclosure document. Some fees and commission payments we receive may relate to arrangements existing before 1 July 2013. These arrangements will cease with effect from 1 January 2021.

Specific arrangements

We have arrangements with third parties for administration and support services in relation to the products below.

WealthView eWRAP and PortfolioCare platform

WealthView and PortfolioCare products and services are issued by companies in the AMP Group. Other companies in the AMP Group also provide services in respect of WealthView and PortfolioCare. Administration services are performed by Asgard Capital Management Limited (Asgard).

If you access a product in the WealthView or PortfolioCare range, then administration fees and, where applicable, trustee fees, are deducted from your account. These fees, as set out in the product disclosure statement or IDPS Guide, are paid to AMP Financial Planning after deduction of expenses for administration services and other services provided as mentioned above.

Further details about the fees and costs of investing in WealthView or PortfolioCare are detailed in the relevant product disclosure statement or IDPS Guide. For closed products, please review the product disclosure statement you received when first investing in your product together with any correspondence from the issuer outlining changes to those fees and costs. Note that WealthView eWRAP (super/pension, investment) and PortfolioCare Elements (super/pension, investment) closed to new members and investors in 2016.

Confidence in the quality of our advice

If at any time you feel like you are not satisfied with our services, the following will help you understand your options and find a resolution.

- Contact your adviser or accredited mortgage consultant and tell them about your complaint.
- If your complaint is not satisfactorily resolved within three business days, please contact AMP Financial Planning:
 - Phone 1800 812 388
 - Email advicecomplaints@amp.com.au
 - In Writing:
AMP Financial Planning Limited
Attention: National Manager, Advice Complaints
33 Alfred Street
Sydney NSW 2000
- They will try to resolve your complaint quickly and fairly. They will provide you with a decision in respect to your complaint within 45 days of us receiving it.
- We note that in some circumstances, it may not be possible for us to completely resolve a complaint within the 45 days. If you do not agree with our decision in respect of your complaint, or are otherwise unsatisfied with our response after the 45 day period, you may escalate your complaint to one of the following External Dispute Resolution Schemes listed in the following table.

Any issues relating to financial advice, investments, superannuation, insurance matters, or credit matters	Australian Financial Complaints Authority (AFCA) GPO Box 3 Melbourne VIC 3001 1800 931 678 www.afca.org.au info@afca.org.au
Any issue relating to your personal information	The Privacy Commissioner GPO Box 5218 Sydney NSW 2001 1300 363 992 privacy@privacy.gov.au

You may also contact the **Australian Securities & Investments Commission (ASIC)** on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights.

Professional indemnity insurance

We maintain professional indemnity insurance to cover our advice and the recommendations provided by your adviser. AMP Financial Planning is also covered by professional indemnity insurance and this satisfies the requirements imposed by the Corporations Act 2001 and National Consumer Credit Protection Act. The insurance covers claims arising from the actions of former employees or representatives of AMP Financial Planning, even where subsequent to these actions they have ceased to be employed by or act for AMP Financial Planning.

Your privacy

We are committed to protecting your privacy. Below we outline how we maintain the privacy of the information we collect about you.

Privacy collection statement

As part of the financial planning process, we need to collect information about you. Where possible we will obtain that information directly from you, but if authorised by you we may also obtain it from other sources such as your employer or accountant. If that information is incomplete or inaccurate, this could affect our ability to fully or properly analyse your needs, objectives and financial situation, so our recommendations may not be completely appropriate or suitable for you.

We are also required under the Anti-Money-Laundering and Counter-Terrorism Financing Act (AML/CTF) 2006 to implement client identification processes. We will need you to present identification documents such as passports and driver's licences in order to meet our obligations.

We keep your personal information confidential, and only use it in accordance with our Privacy Policy. Some of the ways we may use this information are set out below:

- Your adviser and AMP Financial Planning may have access to this information when providing financial advice or services to you;
- Your adviser may, in the future, disclose information to other financial advisers, brokers and those who are authorised by AMP Financial Planning to review customers' needs and circumstances from time to time, including other companies within the AMP group (the Group);
- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist your adviser and the Group in providing financial advice and services to you. A list of countries where these service providers are located can be found in the Group Privacy Policy;
- We may be disclosing your personal information to Phillipines for the purpose of Paraplanning.
- Your information may be used to provide ongoing information about opportunities that may be useful or relevant to your financial needs through direct marketing (subject to your ability to opt-out as set out in the Group Privacy Policy);
- Your information may be disclosed as required or authorised by law and to anyone authorised by you.

Your adviser and AMP Financial Planning will continue to take reasonable steps to protect your information from misuse, loss, unauthorised access, modification or improper disclosure. You can request access to the information your adviser or AMP Financial Planning holds about you at any time to correct or update it as set out in the Group Privacy Policy. The Group Privacy Policy also contains information about how to make a complaint about a breach of the Australian Privacy Principles.

For a copy of the Group's Privacy Policy visit <http://www.amp.com.au/privacy> or you can contact us.

Our financial advisers and credit advisers

About James Carroll

Experience	James is a CERTIFIED FINANCIAL PLANNER® since 2001 with experience in wealth and investment management. James has built a reputation around the delivery of strong client advocacy and professional standards.
Phone	02 9906 3222
Email	james@cpsprivatewealth.com.au
Authorised representative number	249227
Credit representative number	374222

Qualifications (Finance related)

Diploma of Financial Services (Financial Planning)

Advanced Diploma of Financial Services (Financial Planning)

Advanced Diploma of Accounting

Professional memberships

FPA - Financial Planning Association

SMSF Association (SPAA)

Professional designations

CFP - Certified Financial Planner (FPA)

SSA - SMSF Specialist Accreditation (SPAA)

The advice and services I can provide

I am authorised to provide the services listed in the **Our advice and services** section of this guide, except for the following:

- Estate planning (I am authorised to advise on limited estate planning solutions related to your financial products)

Should you require advice and services that extend beyond my authority I can refer you to a suitably qualified professional.

I am also a credit representative of AMP Financial Planning and am authorised to provide strategic debt advice regarding how to structure debt, suitability of existing loan structures and repayment options. I am not authorised to provide credit assistance. If you require advice involving mortgages or other lending products, I can refer you to an accredited mortgage consultant.

How I am paid

I receive the following from our practice:

- salary
- dividends

Based on the above, the following contains my remuneration details:

- I am a Director and shareholder of CPS Private Wealth Management and as such receive a salary plus dividends from CPS Private Wealth Management.

About Daina Partridge

Experience	Daina supports the planners of CPS Private Wealth Management throughout many aspects of the financial planning process. Daina is an authorised representative of AMP Financial Planning and has been in the financial services industry for over 16 years.
Phone	02 9906 3222
Email	plannersupport@cpsprivatewealth.com.au
Authorised representative number	251770
Credit representative number	371212

Qualifications (Finance related)

Diploma of Financial Services (Financial Planning)

The advice and services I can provide

I am authorised to provide the services listed in the **Our advice and services** section of this guide, except for the following:

- Aged care
- Gearing and margin lending
- Self-managed super funds (SMSF)
- SMSF borrowing

Should you require advice and services that extend beyond my authority I can refer you to a suitably qualified professional.

I am also a credit representative of AMP Financial Planning and am authorised to provide strategic debt advice regarding how to structure debt, suitability of existing loan structures and repayment options. I am not authorised to provide credit assistance. If you require advice involving mortgages or other lending products, I can refer you to an accredited mortgage consultant.

How I am paid

I receive the following from our practice:

- salary

Based on the above, the following contains my remuneration details:

I am an employee of CPS Private Wealth Management and as such receive a salary.

About Jacqueline Moelzer

Experience	Jacqui has been in the financial industry for over 15 years and has held an authorised representative status with AMP Financial Planning for the last 8 years. Jacqui specialises in Aged Care, Retirement, Superannuation and Investment planning.
Phone	02 9906 3222
Email	jacqui@cpsprivatewealth.com.au
Authorised representative number	417511
Credit representative number	417514

Qualifications (Finance related)

Diploma of Financial Planning

Advanced Diploma of Financial Planning

Professional memberships

FPA - Financial Planning Association

The advice and services I can provide

I am authorised to provide the services listed in the **Our advice and services** section of this guide, except for the following:

- Gearing and margin lending
- Self-managed super funds (SMSF)
- SMSF borrowing

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How I am paid

I receive the following from our practice:

- salary

Based on the above, the following contains my remuneration details:

- I am an employee of CPS Private Wealth Management and as such receive a salary.

About Benjamin Carroll

Experience	Ben is a trusted financial planner with over 10 years' experience in financial planning. Ben has held previous roles in Colonial First State and ANZ Funds Management. Ben is passionate about providing advice to support clients; to enable them to make better financial decisions and contribute to helping them achieve financial security and wellbeing.
Phone	02 9906 3222
Email	ben@cpsprivatewealth.com.au
Authorised representative number	1004077
Credit representative number	519271

Qualifications (Finance related)

Diploma of Financial Planning

Diploma of Banking and Finance

Graduate Diploma of Financial Planning

Master of Applied Finance

The advice and services I can provide

I am authorised to provide the services listed in the **Our advice and services** section of this guide, except for the following:

- Aged care
- Employer super
- Estate planning (I am authorised to advise on limited estate planning solutions related to your financial products)
- Gearing and margin lending
- Goals based investing
- Limited selection of investment guarantees
- Self-managed super funds (SMSF)
- SMSF borrowing
- Investor directed portfolio services

Should you require advice and services that extend beyond my authority I can refer you to a suitably qualified professional.

I am also a credit representative of AMP Financial Planning and am authorised to provide strategic debt advice regarding how to structure debt, suitability of existing loan structures and repayment options. I am not authorised to provide credit assistance. If you require advice involving mortgages or other lending products, I can refer you to an accredited mortgage consultant.

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I receive the following from our practice:

- salary

Based on the above, the following contains my remuneration details:

- I am an employee of CPS Private Wealth Management and as such receive a salary.