

An aerial photograph of the London skyline at dusk. The Shard, a tall, glass-clad skyscraper with a distinctive spire, is the central focus, illuminated with a warm orange glow. To its left, the curved, glass-walled towers of the City of London are also lit up. To the right, a tall, rectangular glass skyscraper stands prominently. The foreground shows a wide, paved plaza with some construction equipment and a few people. The sky is a mix of blue and orange, indicating the time is either dawn or dusk. The overall scene is a vibrant representation of modern urban architecture.

EUROZ HARTLEYS

Euroz Hartleys Limited

# Financial Services Guide

VERSION 1.6

This Financial Services Guide (“FSG”) dated 15 December 2023 is issued by Euroz Hartleys Limited (“Euroz Hartleys”) (ABN 33 104 195 057), whose contact details are as follows:

**Address:** QV1  
Level 37  
250 St Georges Terrace  
Perth WA 6000

**Postal Address:** GPO Box 2777  
Perth WA 6001

**Telephone:** +61 8 9268 2888

**Email:** info@eurozhartleys.com

**Website:** www.eurozhartleys.com

The purpose of this FSG is to provide you with a brief summary of the financial services that we provide so as to help you to decide whether to become a client of Euroz Hartleys.

This FSG also provides information about remuneration paid to Euroz Hartleys and to other relevant persons in relation to the financial services provided to clients and provides details about how Euroz Hartleys manages complaints.

### Not Independent

#### Disclosure of lack of Independence under 942B(2)(f) of the Corporations Act

Euroz Hartleys and its representatives are not independent, impartial or unbiased (which are restricted words or expressions under the Corporations Act) in relation to the provision of personal advice to retail clients because Euroz Hartleys and/or its representatives may receive monetary benefits in connection with that advice.

For further information regarding how Euroz Hartleys and its representatives are remunerated, please refer to the fee disclosures made in the Appendices.

It's important to understand that disclosing our lack of independence and detailing our remuneration structure does not reduce our obligation to act in your best interests. If you are a retail client and we provide personal advice to you, we have a duty to act in your best interests when providing personal advice, and are required to provide you with appropriate advice.

### WHO IS EUROZ HARTLEYS?

Euroz Hartleys is based in Perth, Western Australia. It holds an Australian Financial Services Licence (AFSL No. 230052) and is a market participant of ASX Limited (“ASX”) and is a participant of Cboe and NSX.

Euroz Hartleys is authorised to provide the following financial services to retail and wholesale clients:

- financial product advice about basic deposit products and deposit products other than basic deposit products, derivatives, debentures stocks or bonds issued or proposed to be issued by a government, life products including investment life products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds and life risk insurance products, interests in managed investment schemes including investor directed portfolio services, interests in managed investment schemes limited to MDA services, retirement savings accounts products (within the meaning of the Retirement Savings Account Act 1997), securities, standard margin lending facilities, superannuation and financial products limited to miscellaneous financial investment products limited to managed investment warrants: to which the definition of derivative in subsection 761D(1) applies that is a financial product of the kind referred to in subparagraph 764A(1)(b)(ii) or 764A(1)(ba)(ii); and that is transferable; and that is a warrant as defined in the Operating Rules of a financial market that is operated by an Australian market licensee and has been admitted to trading status or quotation on a financial market in accordance with the Operating Rules of the financial market (“the Financial Products”);
- deal in a financial product by issuing, applying for, acquiring, varying or disposing of derivatives, interests in managed investment schemes limited to MDA services and securities;
- deal by applying for, acquiring, varying or disposing of the Financial Products on behalf of another person;
- underwriting interests in managed investment schemes and an issue of securities; and
- operate custodial and depository services other than investor directed portfolio services.



### OUR RELATIONSHIP WITH OTHERS

Euroz Hartleys Limited is a 100% owned subsidiary of Euroz Hartleys Group Limited (ASX: EZL).

In relation to exchange traded options, Euroz Hartleys uses the services of a broker that is a Participant of the ASX Group. Your trades will be conducted in your name with the broker. Part of the brokerage charged by the broker will be paid to Euroz Hartleys.

Euroz Hartleys has corporate advisory relationships in place with issuers of financial products. Where relevant, the nature of this relationship will be disclosed to you.

### DOCUMENTS YOU MAY RECEIVE FROM US

If you utilise our services, you may receive a Statement of Advice ('SOA'), a Record of Advice ('ROA'), a Product Disclosure Statement ('PDS'), a Prospectus or an IDPS Guide.

#### Statement of Advice

When establishing an account with Euroz Hartleys, you will be asked to provide details of your objectives, financial situation and needs.

If we provide you with personal advice (i.e. advice which has taken your objectives, financial situation and needs into account), we are required to give to you a SOA the first time we provide you with advice. The SOA will contain:

- our understanding of your objectives, financial situation and needs;
- the financial services and/or products we recommended and the reason why;
- our fees, charges and/or commissions; and
- disclosure of any associations we have with financial product issuers or other parties which may have influenced our advice.

#### Further Advice

If you are an existing client and you receive "further advice" from Euroz Hartleys and your objectives, financial situation and needs have not changed significantly then we may rely on the information we already hold concerning your objectives, financial situation and needs when providing you with further advice.

A Record of Advice ("ROA") may be used to record our "further advice" to you where we have provided you with subsequent advice. You may, by contacting your adviser, request a copy of the ROA at any time, for a period of up to seven (7) years from the date the advice was given to you.

It is important that you give us accurate and complete information regarding your objectives, financial situation and needs as they change from time to time otherwise our advice may not be appropriate for you. A new SOA will only be provided to you if you inform us that your objectives, financial situation and needs are significantly different from what they were when we provided you with a SOA or the scope of the advice you require is different.

### Disclosure Documents

If Euroz Hartleys recommends the acquisition of certain financial products by you (or if Euroz Hartleys is taken to be the issuer of financial products in which you are to deal), then Euroz Hartleys will provide you with a PDS, IDPS Guide, or a Prospectus. These documents contain important information about the particular product including the features, benefits, fees and risks associated with that product so that you can make an informed decision as to whether you wish to acquire that product.

#### Information about remuneration and other benefits

Please see Appendices 1 and 2 for information about remuneration and other benefits that will be received by us as a result of providing financial services to you.

### Managed Discretionary Accounts

Where you propose to enter into a Managed Discretionary Account Agreement with us please see the information set out in Appendix 2.

## **FREQUENTLY ASKED QUESTIONS**

Please find below answers to frequently asked questions. Should you have any queries please contact your adviser.

### **Who is responsible for the advice given to me?**

Your adviser will be acting on your behalf as a Financial Adviser of Euroz Hartleys. Euroz Hartleys is therefore responsible to you for any financial services that your adviser provides to you. Euroz Hartleys acts for itself when it provides advice to you.

### **How may instructions be given?**

You may give instructions to us in accordance with the matters set out in our Trading Terms and Conditions.

### **Do you Trade as Principal?**

Occasionally Euroz Hartleys may trade on a Relevant Exchange on its own behalf 'as principal'. This includes transactions by Euroz Hartleys affiliates, directors, company secretaries or substantial shareholders, their immediate family, or their respective investment vehicles. Euroz Hartleys must seek your consent prior to trading as principal with you and we will not charge you brokerage on the transaction.

### **Do I get detailed information about remuneration and other benefits my adviser gets from giving the advice?**

Yes. You have the right to request details of remuneration and other benefits your adviser receives with respect to providing financial advice to you.

### **How do I get access to my information?**

If you decide to invest, Euroz Hartleys will maintain a record of your transactions. If you wish to examine your records, please contact your adviser who will arrange this for you.

### **Can I trade Shares listed on an International Exchange?**

Euroz Hartleys can facilitate clients wishing to trade shares listed on an overseas exchange. Separate terms and conditions and fees apply to this service. Should you wish to trade international shares please contact your adviser who will provide you with further information to access this service. We may engage with other service providers to trade shares listed on an overseas exchange from time to time. If this is applicable to your circumstances, your adviser will provide you with this information and all applicable disclosures and documents that apply to this service.

### **Who can I complain to if I have a complaint about the financial services that have been provided to me?**

If you have any complaint about the financial service provided to you, please contact Euroz Hartleys Complaints Manager on +61 8 9268 2888 or put your complaint in writing and send it to Euroz Hartleys at:

GPO Box 2777 Perth WA 6001 or email [compliance@eurozhartleys.com](mailto:compliance@eurozhartleys.com).

Euroz Hartleys will try to resolve your complaint quickly and fairly. If, in your view, you have not received a satisfactory outcome regarding your complaint, you have the right to complain to the Australian Financial Complaints Authority which can be contacted at, GPO Box 3, Melbourne, Victoria 3001, email: [info@afca.org.au](mailto:info@afca.org.au) or phone 1800 931 678 (toll free).

The Australian Securities and Investments Commission also has a free call Infoline on 1300 300 630 which you may use to make a complaint and/or obtain information about your rights.

### **What compensation arrangements do you have in place?**

Euroz Hartleys has professional indemnity insurance arrangements in place that satisfy the requirements for compensation arrangements under s912B of the Corporations Act. This professional indemnity insurance also applies to conduct of employees who are no longer employed by Euroz Hartleys but were at the time of any relevant conduct.

### **Cboe compensation arrangements**

There are two different compensation arrangements that may provide protection for retail investors trading on Cboe: NGF Arrangements or Division 3 Arrangements. On 26 October 2020, Cboe became a member of the SEGC, which operates the National Guarantee Fund (NGF). From 26 October 2020, the National Guarantee Fund (NGF) may apply in the circumstances set out in Division 4 of Part 7.5 of the Corporations Act 2001 and Corporations Regulations 2001. Transitional arrangements apply and these are set out on the SEGC's website at [www.segc.com.au](http://www.segc.com.au). For further information on the National Guarantee Fund and what it covers, please contact SEGC, see the SEGC website and refer to Division 4 of Part 7.5 of the Corporations Regulations 2001 (Cth).

When do the Division 3 Compensation Arrangements apply? Where a retail investor suffers a loss in respect of conduct, a transaction or insolvency that occurred before 26 October 2020, that loss may be covered by the Division 3 compensation arrangements. Section 11 of the Cboe Operating Rules outlines the Division 3 compensation arrangements, including the cessation of the arrangements on 25 October 2027 and the requirement, while the arrangements are in place, to make a claim no later than six months after becoming aware of the loss to which the claim relates. Section 11 also outlines that the losses covered by Division 3 are those resulting from defalcation or fraudulent misuse of your money, property or authority by a Cboe participant.

### **Member complaints and discipline**

Stockbrokers in Australia must satisfy the most exacting regulatory standards of any sector of the financial services industry. Stockbrokers are subject to regulations and standards under the Corporations Act, the Market Integrity Rules, and Exchange Rules, such as ASX, Cboe and NSX Rules. Separate and additional to the above requirements, the Stockbrokers And Investment Advisers Association ('SIAA') is a professional body which sets professional, ethical and educational standards for its members.

The aim of these standards is to give investor's confidence that, when they deal with a member of the SIAA, they are dealing with a person who exhibits the highest level of professionalism and integrity, and the services that they receive will be of a high quality.

### **SIAA's professional, ethical and education standards are contained in:**

- SIAA Code of Ethical Conduct
- SIAA Constitution and Rules
- Standards promulgated by the SIAA Board or a relevant SIAA Committee from time to time.

In order to ensure that its standards are met, SIAA has established a Complaints Handling Process and a Conduct Review and Disciplinary System (CRDS) to investigate and determine complaints against members as well as any other referral involving the conduct of a member.

### **Lodging a Complaint Against a Member**

Complaints may be made in person. You do not need to be a client of a stockbroker to lodge a complaint. The Complaint can also be made in writing using the SIAA Complaints Form and addressed to:

Chief Executive  
Stockbrokers and Investment Advisers  
Association  
Level 2, 74 Pitt Street  
Sydney NSW 2000  
Or email: [complaints@stockbrokers.org.au](mailto:complaints@stockbrokers.org.au)

The Complaint should identify:

- the Member against whom the complaint is made;
- a description of the complaint; and
- the name and contact details of the complainant.

## **PRIVACY POLICY AND CLIENT STATEMENT**

This policy applies to information collected by Euroz Hartleys Limited (ABN 33 104 195 057) and its related bodies corporate ("Euroz Hartleys" or "we" or "us"). It outlines how we collect and use personal information that we hold about you in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (Privacy Act).

### **Why do we collect personal information and what personal information is collected?**

We only collect personal information that is reasonably necessary for us to provide our products and services. If you do not provide the information that we ask for, we may not be able to provide the products or services you have requested. We may collect information such as your name, address, phone number, email address, tax file number, bank account details, other information that may be required for identification purposes, information about your investments and transactions and other information related to the services we provide.

### **Sensitive information**

We may also need to collect sensitive information if we organise insurance cover for you. Sensitive information includes health information, racial information, genetic information, etc. We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising you and dealing for you.

### **How personal information is collected?**

We will generally collect your personal information in the course of you applying to open an account with Euroz Hartleys. By using Euroz Hartleys services you consent to Euroz Hartleys collecting your information from you or from a person who is acting as your agent. We may also collect information directly from you or your agent, such as when you or your agent provides information by phone, email, in an application form, or when you visit our website. Our website may use programs to record traffic to our website. This allows us to see what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to disable such functionality.

From our Newsletters and publications, we can track usage and reading to see which areas are of particular interest. This enables us to incorporate more articles of a similar nature.

We may also receive personal information from third parties. If we do, we will protect it as set out in the Privacy Policy. You have a right to refuse us authorisation to collect information from a third party.

Sometimes you may provide us with someone else's personal information, e.g. other members of your family group. You must not do this unless you have their consent to do so. You should also take reasonable steps to inform them of the matters set out in the Privacy Policy.

### **Are you obliged to provide us with personal information?**

You are not required to provide us with the information that we request, or to allow us to collect information from third parties. However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate our arrangement with you. Importantly, if you provide either inaccurate or incomplete information to us you risk obtaining products or services that may not be appropriate or suitable for your needs and you may risk suffering a financial detriment or financial loss.

### **What happens if we obtain information about you which we have not solicited?**

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you. Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as practicable.

### Use and disclosure of your personal information

Euroz Hartleys may use your personal information for the primary purpose of providing financial services to you, as well as for related purposes such as:

- to verify your identity or transactions which you may enter into with us;
- to administer and manage the provision of our products and services;
- to comply with laws and regulatory requirements including complying with any request made by a governmental authority or regulator, including in connection with legal proceedings or the prevention or detection of fraud and crime;
- to comply with Euroz Hartleys risk management policies and procedures;
- those involved in providing, managing, or administering the products or services you have requested, including those advisers, paraplanners and organisations who work with us; or
- conducting due diligence as part of acceptance of your account with Euroz Hartleys and its related bodies corporate; or
- another purpose related to the primary purpose.

For the purposes we have described, we may disclose your personal information to:

- our suppliers (including service and content providers), contract and service providers, professional advisers, dealers and agents;
- government agencies or individuals responsible for the investigation and resolution of disputes or complaints covering your use of our services and facilities including for example ASIC, AUSTRAC or the OAIC;
- other parties involved in the administration of your investments including securities exchanges, product issuers, investment registries or mailing houses;
- anyone to whom our assets or business (or any part of it) is transferred (or offered to be transferred, subject to confidentiality provisions);
- other entities in the Euroz Group of companies;
- other person or entities where you have otherwise consented or as otherwise required or authorised by law; or
- any person considering acquiring an interest in our business.

We may also need to disclose information to any financial institution you have nominated, other Australian Financial Services Licensees, share registries, the Clearing House Electronic Subregister System (CHES) and the Australian Securities Exchange (ASX) for the purpose of completing transactions on your behalf. In addition, we are required to disclose information to the Australian Securities and Investments Commission and Australian Taxation Office as part of our regulatory reporting.

### Do we disclose personal information for marketing?

We may use your personal information to offer products and services that we believe may interest you. We may also disclose your personal information to external service providers who assist us to market our products or services.

We are permitted to use personal information for marketing if the client would reasonably expect us to do so and when the client has been provided with a simple means of opting out of the marketing service.

If you do not wish to receive marketing offers from us please inform us by sending an email to [info@eurozhartleys.com](mailto:info@eurozhartleys.com).

### Government related identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when authorised by law or unless you have voluntarily consented to disclose this information to a third party.

### Access and correction and updating personal information

Generally, we will provide you with access to your personal information that we hold within a reasonable time of a request unless an exception applies under the Privacy Act. Where we provide you with access to such information, we may charge you a reasonable fee to cover our costs.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, up to date, complete and relevant. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate or incomplete, you may contact us to correct the information.

If we disagree about the correction you have supplied, and refuse to correct the personal information, or if we believe that we are unable to comply with your request, we will give you a written notice to that effect. You have the right to make a complaint if you disagree with our decisions in relation to these matters.



**Your Rights under the General Data Protection Regulation 2016/679 (GDPR).**

If you are an individual residing in the European Union (EU), you have certain rights as to how your personal information is obtained and used. Euroz Hartleys complies with your rights under the GDPR as to how your personal information is used and controlled if you are an individual residing in the EU.

Except as otherwise provided in the GDPR, you have the following rights:

- a. To be informed how your personal information is being used;
- b. Access to your personal information (we will provide with a free copy of it);
- c. To correct your personal information if it is inaccurate or incomplete;
- d. To delete your personal information (also known as 'the right to be forgotten');
- e. To restrict processing of your personal information;
- f. To retain and reuse your personal information for your own purposes;
- g. To object to your personal information being used; and
- h. To object against automated decision making and profiling.

Please contact us at any time to exercise your rights under the GDPR at the contact details in the Privacy Policy.

We may ask you to verify your identity before we act on any of your requests.

**Storage and security of information**

Euroz Hartleys stores personal information in a combination of computer storage facilities, paper-based files and other records. We will take reasonable steps to protect personal information from loss, misuse, unauthorised access, modification or disclosure.

Where we employ data processors to process personal information on our behalf, we only do so on the basis that such data processors comply with the requirements under the Australian Privacy Act and GDPR and that have adequate technical measures in place to protect personal information against unauthorised use, loss and theft.

In the event that you cease to be a client of ours, any personal information which we hold about you will be maintained for a period of not less than 7 years in order to comply with legislative and professional requirements.

You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

**Cross-border disclosure of personal information**

We do not currently disclose your personal information overseas, however some third party providers we may engage with from time to time may have registered overseas locations. In the event that we do disclose your personal information overseas, Euroz Hartleys will make reasonable steps to ensure that the foreign recipient will not breach the Australian Privacy Principles and to ensure that they are subject to similar privacy laws that will afford protection in the same manner as the Australian Privacy Principles.

**Contacting us and complaints**

If you wish to contact us for any purpose regarding this policy including making a complaint about the way we have handled your personal information (including if you think we have breached the Privacy Act) you may do so to our Privacy Officer in writing, by mail or fax to the address or fax number set out below. When you contact us, include your email address, name, address and telephone number and clearly describe your complaint. Our Privacy Officer will investigate the complaint and respond to you promptly.

**Euroz Hartleys Limited Privacy Officer**

Mailing Address: GPO Box 2777  
Perth WA 6001  
Street Address: QV1  
Level 37  
250 St Georges Terrace  
Perth WA 6000  
E-mail: info@eurozhartleys.com  
Telephone: +61 8 9268 2888

If you consider that we have failed to resolve the complaint satisfactorily and you are an individual located in Australia, you can complain to the Office of the Australian Information Commissioner. The complaint is to be in writing and the service is free of charge. The complaint may be submitted via mail, fax, email or online and addressed to the Director of Compliance (Investigations), GPO Box 5218, Sydney NSW 2001; email enquiries@oaic.gov.au; or facsimile: +61 2 9284 9666.

**Policy Updates**

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained on our website (<http://www.eurozhartleys.com>) or by contacting us.



ALL AMOUNTS STATED BELOW ARE GST INCLUSIVE

### Information about remuneration and other benefits

When we trade on your behalf on a financial exchange you will be required to pay brokerage.

Brokerage applies to buy and sell orders and there is a minimum brokerage fee of \$132 per order.

Our standard brokerage charges are as follows:

Transaction Value	Fee (Inc GST)
\$0 to \$5,000	\$132
\$5,001 to \$15,000	2.2%
\$15,001 to \$50,000	1.65%
\$50,001 plus	Negotiable

With respect to trading in exchange traded options you will be charged brokerage by a broker that has been engaged by us to trade for you and part of that brokerage will be paid to us by the broker (part of this amount may be paid to your adviser). The amount that is payable to us (and/or your adviser) will be disclosed at the time that personal advice is given or as soon as practicable after that time.

### Trading in financial products that are traded on an overseas market

We can arrange for trading to be conducted on an overseas market by way of another broker. This broker will pay part of the brokerage paid by you to us (part of this amount may be paid to your adviser). The amount that will be paid to us (and/or your adviser) will be disclosed at the time that personal advice is given or as soon as practicable after that time.

### Strategic Advice Fees

Where Euroz Hartleys provides you with strategic advice (financial planning advice), fees will be determined based on a number of factors which may include the products and services that are the subject of the advice and the complexity of the advice that is being provided. The total fee payable will be agreed with you prior to the provision of services. Part of the fee paid by you may be paid to your adviser. The total fee payable by you and the amount that will be paid to your adviser will be disclosed to you at the time that personal advice is provided to you or as soon as practicable after that time.

Euroz Hartleys may charge an hourly based fee in addition to the agreed fee where it is required to undertake additional work beyond that which was agreed. Euroz Hartleys current hourly rate in these circumstances is \$440 per hour. Part of the fee paid by you may be paid to your adviser. The total fee payable by you and the amount that will be paid to your adviser will be disclosed to you at the time that personal advice is provided to you or as soon as practicable after that time.

### Portfolio management services

#### Portfolio Administration Service (PAS)

The PAS is administered by Euroz Hartleys in conjunction with an external provider.

The PAS provides formal annual reviews, quarterly reports, performance reporting, CGT reporting, consolidated portfolio reports and income and expense reports. This service also includes access to your portfolio reports online.

Euroz Hartleys charges for this service on the basis of funds under management, according to a sliding scale, subject to a minimum annual fee of \$2,640 per account. Our standard fee is 1.10% on the balance of funds under management and in addition you will incur brokerage fees with respect to the PAS and fees with respect to the acquisition of other financial products. Part of the fee (including brokerage) paid by you may be paid to your adviser. The total fee payable by you and the amount that will be paid to your adviser will be disclosed to you at the time that personal advice is provided to you or as soon as practicable after that time.

Euroz Hartleys also operates a service that has similar characteristics to the PAS and which has a similar fees structure. The total fee payable by you and the amount that will be paid to your adviser with respect to this service will be disclosed to you at the time that personal advice is provided to you or as soon as practicable after that time.

#### Griffin Portfolio Management Service Fees

The Griffin Portfolio Management Service is a comprehensive portfolio management and administration service. If you subscribe to the Griffin Portfolio Management Service you will be charged fees in accordance with the matters set out in the following table:

Type of Fee	Fee amount
Statement of Advice Fee	From \$605 (minimum cost)
Investment entry, contributions and placements fees (managed funds)	Between 0% to 5.5% max
Company placement and listing offers	Between 0% to 6.6%
Account Opening Fees per account	\$220.00
Portfolio management fee	Tiered fee structure between 0% to 1.944% of the value of the assets under management

In some circumstances a flat dollar management fee will be charged with respect to your account and particular fee arrangements may apply where you have multiple accounts. Brokerage will be charged with respect to trades executed on your behalf.

Part of the fee (including brokerage) paid by you may be paid to your adviser. The total fee payable by you and the amount that will be paid to your adviser will be disclosed to you at the time that personal advice is provided to you or as soon as practicable after that time.

#### *Entrust Premium Management Service (EPMS) Fees*

The EPMS is a comprehensive portfolio management and administration service. If you subscribe to the EPMS you may be charged fees on the basis of the matters set out in the following table.

Type of Fee	Fee amount
Statement of Advice Fee (SOA)	From \$605 (minimum cost)
Investment entry, contributions and placements fees (managed funds)	Between 0% to 5.5% max.
Company placement and listing offers	Between 0% to 6.6%.
Portfolio management fee	Tiered fee structure between 0% to 1.944% of the value of the assets under management

In some circumstances a flat dollar management fee will be charged with respect to your account and particular fee arrangements may apply where you have multiple accounts. The total fee payable by you and the amount that will be paid to your adviser will be disclosed to you at the time that personal advice is provided to you or as soon as practicable after that time.

#### *Particular arrangements*

The portfolio management services offered by Euroz Hartleys may have arrangements in place that apply to a particular client or group of clients (for example utilising the services of a platform provider). Where this is the case, any remuneration received by us (part of which may be paid to your adviser) will be disclosed at the time personal advice is given or as soon as practicable after that time.

#### **Insurance Products**

An insurance company may pay Euroz Hartleys initial and ongoing commissions when we arrange for you to obtain an insurance product. As the commission payable may vary with each insurer, your adviser will give you details about any commission receivable by us in the SOA that will be given to you. Euroz Hartleys may pay your adviser a share of such commissions and the amount payable will be disclosed to you in the SOA. For example, a typical commission range for yearly renewable term life insurance may be between 0% and 66% of the first year's premium and up to 22% per annum of renewing premiums and part of this amount will be payable to your adviser.

If your insurance policy lapses in the first year (i.e. the policy is cancelled or not continued, or the policy cost is reduced), there will be a clawback of 100% of the commission received by the adviser, which is reduced to 60% clawback in the event of a lapse in the second year.

#### **Nominee service**

In the event that you elect to obtain nominee services, the fee payable is based upon the number of lines of stock held in the nominee account at the end of the calendar month and charged to the nominated account within 7 business days. For example, if the account has 5 different stock positions then the fee will be 5 times \$15.50 or \$82.50 per month.

### **Underwriting and initial public offers**

We may receive fees from an issuing company when we lodge your successful application to participate in an IPO. Details of the fee will be provided in the relevant prospectus but they typically range from 1.1% to 6.6% of the capital raised. Your adviser may receive a fee for arranging this investment for you. This fee is typically 0.55% to 5.5% of the capital raised.

We may also underwrite capital raisings and will receive a fee as a result. The total fee received by us will be disclosed in the relevant offer documents.

### **Off Market securities transfers**

Each transfer will be charged at the rate of \$44.

### **Remuneration received from other entities**

To the extent permitted by law, our advisers may also receive alternative forms of remuneration such as the costs of maintaining their professional development qualifications. Our advisers may attend professional training either subsidised or wholly funded by product providers that issue products available to be accessed in connection with our services.

Euroz Hartleys keeps a register detailing certain non-monetary benefits that their advisers receive (e.g. benefits valued between \$100 and \$300, genuine education or training and information technology software or support). You can review an extract of the register by contacting your adviser.

### **Administration fees**

Euroz Hartleys may in certain circumstances charge a fee for particular administrative expenses. You will be advised as to this fee before the service is provided.

### **Overview of remuneration structure**

Euroz Hartleys initially receives all brokerage and other fees and charges that are payable by you (or third parties) to Euroz Hartleys.

Your adviser (who may be a director of Euroz Hartleys) is remunerated by a combination of the payment of salary and, in some circumstances the right to receive a proportion of the brokerage and other fees paid by you (where relevant, the amount paid to your adviser will vary from between 35% and 50% of the fees paid by you or received with respect to you).

With respect to the provision of Strategic Advice, the position is as follows:

- Your adviser will receive part of the fee and the remainder will be received by Euroz Hartleys.
- In some circumstances an additional financial adviser/s at Euroz Hartleys may be engaged to assist in the provision of Strategic Advice to you. In these circumstances, the fee may be divided between Euroz Hartleys, your adviser and the additional financial adviser/s.

In some circumstances, Euroz Hartleys and your adviser may be entitled to receive other remuneration with respect to financial services that have been provided to you. Remuneration of this type will not be received unless you have expressly authorised that such a payment can be made on your behalf to Euroz Hartleys and/or your adviser.

Your adviser may also, in some circumstances, receive Performance Rights that will be issued by Euroz Hartleys under a long-term incentive plan.

Where you are provided with a SOA, you will be provided with information about remuneration or other benefits that will be received by us and your adviser with respect to the advice set out in the SOA.



Euroz Hartleys offers its clients a Managed Discretionary Account (MDA) service. You must enter into a MDA contract with Euroz Hartleys before the MDA service can be provided to you.

#### **The MDA contract**

The MDA contract will include an Investment Program prepared in accordance with Division 3 of Part 7.7 and Division 2 of Part 7.7A of the Corporations Act. The Investment Program will contain the following information about:

- 1) the nature and scope of the discretions that Euroz Hartleys will be authorised and required to exercise under the MDA contract and the investment strategy that is to be applied in exercising those discretions;
- 2) any significant risks associated with the MDA contract;
- 3) the basis on which the MDA contract is considered suitable for you; and
- 4) warnings that the MDA contract may not be suitable for you if you have provided limited or inaccurate information about your relevant personal circumstances and may cease to be suitable if your relevant personal circumstances change.

Without reference to you, Euroz Hartleys will exercise or choose to not exercise any rights that arise with respect to Financial Products in Your Managed Discretionary Portfolio including voting rights, in relation to sale, consenting to corporate actions or making dividend reinvestments.

Euroz Hartleys will be responsible for reviewing the Investment Program.

#### **What are the significant benefits associated with investing through a MDA service?**

There are a number of significant benefits associated with investing through a MDA service, including: 1) The management of your portfolio is tailored to your individual needs by your expert professional adviser who has access to the highest quality research tools and investment resources. 2) Euroz Hartleys may invest in certain financial products on your behalf, without first seeking your instructions. Accordingly, should an opportunity arise that requires immediate action, the required action can be taken in a timely manner.

#### **What are the significant risks associated with investing through the MDA service?**

There are risks associated with investing through a MDA service. These significant risks include:

- 1) Inaccurate and incomplete relevant personal information being provided to your adviser, resulting in investments in financial products not being suitable for your needs.
- 2) The value of your portfolio can fall because of market related risk or because of risk associated with particular products that you are invested in.
- 3) All or part of the investments in your MDA account may be invested either directly, or indirectly, in the stock market. By its very nature, an investment in the stock market entails both general market and company specific risks. While risk can be mitigated through diversification of stocks, some risk will still be present.
- 4) The MDA service is a discretionary service which involves the delegation to Euroz Hartleys of the ability to make investment decisions on your behalf without any prior reference to you and accordingly, there is a risk that adverse investment decisions could be made.
- 5) The operation of a MDA service is regulated and therefore may be affected by changes in the law.

#### **Non-Limited Recourse Products**

Before entering into an MDA service arrangement with us, and at the time of each annual review by us, you will be required to acknowledge that you have been provided with a warning regarding non-limited recourse products and facilities, and that you have consented to us acquiring, holding or disposing of those products or facilities on your behalf.

The relevant non-limited recourse products are margin loans.

Investing into non-limited recourse products can significantly increase your investment risk. Specifically, a non-limited recourse product imposes a legal obligation on you to pay an amount to another person or financial institution in the event of the occurrence or non-occurrence of something where the rights of the other person or financial institution are not limited to any property or asset that you have paid or set aside as security for the agreement.

For example, if you use \$50,000 of your own money and borrow \$450,000 via a margin loan to invest \$500,000 in shares - if your shares suffer a significant decrease in value to say \$200,000 and you are required to meet a margin call from the lender immediately to fully repay your margin loan, you may be forced to sell \$250,000 of your other assets and property to make up the shortfall in value due to the decrease in value of your shares which have been held as security for the margin loan. Because this is a non-limited recourse product you should understand that you can lose an amount greater than the current value of your investment, in which case you can be forced to dispose of the other assets or property you own (including your family home if it is in your name) to repay your loan. The actual level of risk is unknown at present because a portfolio has not been constructed for you. However, where advice is provided to you in the form of the Investment Program – Statement of Advice which involves non-limited recourse products, then the amount of risk related to the non-limited recourse products will be fully disclosed to you, in order for you to be able to make an informed decision as to whether to proceed with the MDA service.

With respect to margin lending and the management of margin calls we have adopted the following policy:

- 1) we generally do not allow the loan to value ratio (LVR) to exceed 50% and LVRs are reviewed at least weekly. This process is designed to limit the likelihood that a margin call will be received and may involve the closing out of a particular position at a loss; and
- 2) when a margin call is received your adviser will manage the process by which the margin call is met (such as selling assets held by way of the MDA service to meet the margin call). It may be necessary to close out a position at a loss as to meet a margin call.

### Instructions

You may give instructions to us in accordance with

the matters set out in the MDA Agreement.

### Fee disclosure

#### DID YOU KNOW

**Small differences in both investment performance and fees and costs can have a substantial impact on your long-term returns.**

**For example, total annual fees and costs of 2% of your account balance rather than 1% could reduce your final return by up to 20% over a 30-year period (for example, reduce it from \$100,000 to \$80,000).**

**You should consider whether features such as superior investment performance or the provision of better member services justify higher fees and costs.**

**You may be able to negotiate to pay lower fees. Ask the fund or your adviser.**

#### TO FIND OUT MORE

If you would like to find out more, or see the impact of the fees based on your own circumstances, the Australian Securities and Investments Commission (ASIC) Moneysmart website ([www.moneysmart.gov.au](http://www.moneysmart.gov.au)) has a managed funds fee calculator to help you check out different fee options.

### Fees and other costs

This section shows fees and other costs that you may be charged. These fees and costs may be deducted from your money, from the returns on your investment or from the assets of the managed investment scheme as a whole.

You should read all the information about fees and costs because it is important to understand their impact on your investment.

### Fees and costs summary

Premium Management Service		
Fee	Amount	How and when paid
Management fees and costs	1.5% + GST	Calculated Daily, debited monthly from the linked Macquarie Cash Management Account.
Performance fees	\$0	Not applicable.
Transaction costs	\$1,320	See Appendix 1 as to brokerage charges. Assume 10 trades per year at minimum brokerage rate.
Establishment fees	\$0	Not applicable.
Contribution fees	\$0	Not applicable.
Buy-sell spread	\$0	Not applicable with respect to a portfolio that consists of ASX traded securities and cash.
Withdrawal fees	\$0	Not applicable.
Exit fees	\$0	Not applicable.

### Additional explanation of fees and costs

Part of the fees sets out above may be paid to your adviser. Please see Appendix 1 as to the basis upon which such a payment may be made.

A different fee structure may apply where your portfolio holds assets that have been purchased with a margin loan.

Euroz Hartleys offers MDA services with different characteristics. The matters set out above relates to a MDA Service operated by way of the Premium Management Service. Different fee structures will apply with respect to other MDA services that operate on a different basis. However, the fee structure will be substantially the same.

Please see Appendix 1 as to the overall remuneration structure that applies to MDA services that are provided by Euroz Hartleys.

### Example of annual fees and costs for an investment option that is equivalent to a balanced portfolio

This table gives an example of how the ongoing annual fees and costs for an investment option that is equivalent to a balanced portfolio for this product can affect your investment over a 1 year period. You should use this table to compare this product with other products offered by managed investment schemes.

Premium Management Service	Balance of \$100,000 with a contribution of \$10,000 during year	
Contribution fees	\$0	For every additional \$10,000 you put in, you will be charged \$0.
<b>PLUS</b> Management fees and costs	1.5% + GST	And, for every \$100,000 you have in the Premium Management Service will be charged or have deducted from your investment \$1,650 each year.
<b>PLUS</b> Performance fees	\$0	And you will be charged or have deducted from your investment \$0 in performance fees each year.
<b>PLUS</b> Transaction costs	\$1,320	And, you will be charged or have deducted from your investment transaction costs of \$1,320 (assuming 10 trades per year at minimum brokerage rate).
<b>EQUALS</b> cost of Premium Management Service		<p>If you had an investment of \$100,000 at the beginning of the year and you put in an additional \$10,000 during that year, you would be charged fees and costs in the range of:</p> <p><b>\$2,970 to \$3,135</b></p> <p><b>What it costs you will depend on the investment option you choose and the fees you negotiate.</b></p>



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