

## FINANCIAL SERVICES GUIDE

### Euroz Hartleys Limited

ABN 33 104 195 057

AFSL No.230052

Participant of ASX Group

[www.eurozhartleys.com](http://www.eurozhartleys.com)

### Part One

This Financial Services Guide ("FSG") dated October 2020 is issued by Euroz Hartleys Limited ("Euroz Hartleys"), whose contact details are as follows:

Location Address: Level 6 / 141 St Georges Terrace  
Perth WA 6000

Postal Address: GPO Box 2777  
Perth WA 6001

(08) 9268 2888

(08) 9268 2800

Email: [info@eurozhartleys.com](mailto:info@eurozhartleys.com)

Website: [www.eurozhartleys.com](http://www.eurozhartleys.com)

### Purpose of Financial Services Guide

This Financial Services Guide is intended to inform you of certain basic matters relating to our relationship, our charges, the type of advice and services we can provide you, and what you can do if you have a complaint about our services.

We provide you this information prior to us providing you with a financial service, to enable you to make an informed choice as to whether you wish to use any of the services described in this FSG. References in this FSG to 'Euroz Hartleys', 'we', 'us' or 'our' are references to Euroz Hartleys Limited.

### This FSG is in two parts

Part 1 contains information about who we are and how we can be contacted, what services and types of financial products we are authorised to provide to you, how we (and any other relevant parties) are remunerated, details of any potential conflicts of interest, and details of our internal and external dispute resolution procedures, along with how you can access them.

Part 2 contains information relating to our Schedule of Fees.

Euroz Hartleys may amend the FSG from time to time. As such, we reserve the right to publish any amendments electronically on our website [www.eurozhartleys.com](http://www.eurozhartleys.com); however any material change will be posted to all clients notifying them of this.

### Statement of Advice

Retail clients who use Euroz Hartleys services for the first time and require personal financial product advice will be provided with a Statement of Advice (SoA). This SoA will document the advice, the reasons for our recommendation, and information about fees, commissions and other benefits and associations, which may have influenced us when providing the advice.

Existing clients will also be provided with a SoA when they notify Euroz Hartleys that either their personal circumstances, financial goals or investment objectives have changed significantly or such changes are likely to influence any further advice provided by Euroz Hartleys.

### Further Advice

If you are an existing client and you receive “further advice” from Euroz Hartleys and your personal circumstances, financial goals or investment objectives have not changed significantly then we may rely on the information we may already hold concerning your personal circumstances, financial goals and investment objectives when providing you with further advice. Whilst you will not be provided with a SoA you may request a record of such advice for a period of up to seven years from the date it was provided. You should direct requests for a record of advice to your representative.

### Product Disclosure Statement

Where we either make a recommendation for you to acquire a particular financial product (other than securities such as listed shares), or offer to issue or arrange the issue of a financial product to you, we will provide you with a **Product Disclosure Statement (PDS)**. The PDS contains information about the particular financial product including the features, benefits, fees and risks associated with the particular product, which will enable you to make an informed decision in relation to the acquisition of that financial product.

### Who will be providing the financial service to you?

Euroz Hartleys will be responsible for providing the financial services to you through its representatives and we are responsible for the actions of our representatives when providing the services. We are a Trading Participant of the ASX, Clearing Participant of ASX Clear and Settlement Participant of ASX Settlement in respect of cash market products.

### Our Relationship with Others

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

The other members of the Euroz Group of Companies are as follows:

- Euroz Hartleys Securities Limited (AFSL 243302),
- Entrust Wealth Management Pty Ltd (AFSL 222152)
- Westoz Funds Management Pty Ltd (AFSL 285607)
- Westoz Investment Company Limited (ASX: WIC)
- Ozgrowth Limited (ASX: OZG).

Griffin Portfolio Management service is owned and administered by Euroz Hartleys.

In relation to exchange traded option products traded on the ASX Limited, Euroz Hartleys uses the services of an executing broker that is a Participant of the ASX Group. Your trades will be held in your name with the executing broker. The executing broker will separately provide services to you in relation to trades entered into on your behalf, which includes arranging clearing and settlement services in relation to your trades through a clearing participant of the relevant market.

### What financial services and products do we offer?

Euroz Hartleys is authorised under its AFSL to provide you with the following services:

- Provide financial product advice;
- Deal in a financial product; and
- Custodial/ depository services.

We provide advice and deal in relation to the following types of products:

- deposit products;
- derivatives;
- securities (such as shares);
- managed investments;
- managed investment warrants;
- standard margin Lending
- retirement savings accounts;
- superannuation;
- life products; and
- debentures, stocks or bonds.

Euroz Hartleys utilizes an approved product list for managed investments and master trusts. This list ensures that recommended products are vetted and have supporting research.

### **Who does Euroz Hartleys act for when we provide financial services to you?**

Generally, Euroz Hartleys acts for you when it provides financial services to you.

### **How do you obtain our services?**

If you have been provided with a Euroz Hartleys Representative, please contact that Representative directly. If you are a new client and do not have a nominated Representative, please contact us on our contact details provided in this FSG.

### **Best Execution**

Under ASIC Market Integrity Rules Euroz Hartleys is required to have in place a 'Best Execution Policy' and take all reasonable steps to obtain the best possible outcome for you taking into account such relevant factors as price, cost, speed, size, likelihood of execution and settlement and/or any other relevant order execution consideration when executing, receiving and transmitting your orders where such orders relate to equity market products. Our Best Execution Policy is available at [www.eurozhartleys.com](http://www.eurozhartleys.com)

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

You may give us instructions in person, by email, by telephone, facsimile or other means as may be mutually agreed. However, you must be aware that unless you speak to your adviser or their assistant directly there is no guarantee that your order will be executed in a timely manner.

Prior to accepting your first instruction, Euroz Hartleys will require you to sign an Account Opening Form that contains, amongst other things the terms and conditions on which our relationship will be based.

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

Generally, there are four ways that we can charge for our services:

- brokerage when you buy or sell securities or derivatives;
- a fee based on the services we provide;
- fees or commissions based on the value of funds in relation to which we provide advice; or
- commissions based on certain financial products.

Information about our remuneration and commissions are set out in **Part 2 of this FSG** for each of our particular services, including when and how remuneration, commissions or other benefits are payable. Some fees that we charge may be tax deductible. You must confirm this with your own professional taxation adviser in relation to your specific situation.

### **How are our Advisers remunerated?**

Where permitted by law, our Advisers may be remunerated by one or a combination of salary, brokerage, commission or fees depending on which services and products you choose to instruct Euroz Hartleys.

The level of fees, commission or brokerage earned in relation to financial services and financial products will vary depending upon the financial service or financial product. The level of fees, commissions and brokerage that may be payable to Euroz Hartleys and its Advisers are detailed in **Part 2 of this FSG**.

Where we provide you with personal advice, the amount of fees, commission and brokerage will be disclosed in the record of personal advice (i.e. the SoA or the record of advice in relation to further advice). You will also be provided with specific details in relation to each transaction, financial product or financial service provided to you by way of a Confirmation of Transaction.

### **Will anyone be paid for referring you to Euroz Hartleys?**

Where permitted by law, if a third person has referred you to us, we may pay that person a part of any fees, commissions or brokerage earned by us. Where this occurs, this will be disclosed on a Confirmation of Transaction and provided to you in your SoA. This will not increase the fees, commission or brokerage you pay us.

**Do I get information about any associations or relationships between Euroz Hartleys and the issuers of financial products which might reasonably be expected to be capable of influencing Euroz?**

Yes. You have the right to know about such associations and relationships and you will be informed as to any relevant associations or relationships. Euroz Hartleys is associated with the following issuers of financial products:

- Euroz Limited;
- Ozgrowth Limited;
- Westoz Investment Company Limited.

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

**Will Euroz Hartleys provide you advice, which considers your needs, objectives and financial circumstances?**

In order for Euroz Hartleys to provide you with personal advice, you will need to provide us with details of your objectives, financial situation and needs before we recommend any financial products or services to you. You have the right not to divulge all or some of this information to us, if you do not wish to do so. In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully in the Account Opening Forms and SoA.

**Does Euroz Hartleys trade as principal?**

Occasionally Euroz Hartleys may trade on the ASX 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. With the exclusion of Market Participants and participants or members of a Recognised Stock Exchange, Euroz Hartleys will seek your consent prior to entering a matched transaction with you and we will not charge you brokerage on the transaction. Further details are contained in our Allocation Policy available at [www.eurozhartleys.com](http://www.eurozhartleys.com)

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

Under the Anti-Money Laundering and Counter-Terrorism Act 2006 Euroz Hartleys is required to know its customers. This will be achieved through customer identification and verification of that identification. We maintain a record of your personal profile, which may include details of your objectives, financial situation and needs. We also maintain records of any recommendations or advice made to you. Additionally, we will also carry out customer due diligence, which will require Euroz Hartleys to monitor customer transactions on an ongoing basis. We are committed to implementing and promoting our privacy policy, which will ensure the privacy and security of your personal information. Reasonable steps are taken to preserve the security of collected personal information. Secure passwords, user login requirements or other security procedures are used to protect stored personal information. A copy of our privacy statement is available on our website at "www.hartleys.com.au" or ask your Representative for a copy. If you wish to review your personal information, we ask that you make a request in writing and allow up to fourteen (14) working days for the information to be forwarded. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise you of the likely cost in advance and can help to refine your request if required.

**How can you complain about the provision of the financial services to you?**

If you have any complaint about the financial service or financial products provided to you, you should take the following steps:

1. Contact the Compliance Manager at Euroz Hartleys at GPO Box 2777, Perth WA 6001 and inform them about your complaint in writing. The Compliance Manager will investigate oral complaints made directly or referred by a Representative or Team Leader. These types of complaints would typically involve issues of an administrative nature or where small amounts (under \$100) of compensation are sought.
2. If the complaint has not been resolved to your satisfaction, you may lodge a complaint with Australian Financial Complaints Authority (AFCA). AFCA contact details are: Website: [www.afca.org.au](http://www.afca.org.au) Email: [info@afca.org.au](mailto:info@afca.org.au) Telephone: 1800 931 678 (free call) or in writing to: Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001.
3. You may choose to refer the matter to the Australian Securities and Investments Commission ("ASIC"). ASIC may be contacted on their free call Info line on 1300 300 630.

**Professional Indemnity Insurance**

Euroz Hartleys has Professional Indemnity (PI) Insurance cover which complies with our obligations under our licence and which we believe is adequate having regard to:

- the liabilities which may arise out of our membership of the Australian Financial Complaints Authority; and
- the nature and size of our financial services business.

This PI insurance also applies to conduct of employees who are no longer employed by Euroz Hartleys but were at the time of any relevant conduct.

**What should you know about the risks of the financial products or strategies we recommend to you?**

We will explain to you any significant risks of financial products and strategies, which we recommend to you. If you are uncertain of any information that we have provided to you, you should not act in relation to the information and you should ask us to explain those risks to you. Investments can decline in value as well as appreciate in value. The measure in this change of value is often referred to as volatility, i.e., the more the value varies over time, the more volatile the assets and therefore the more risk involved in investing in it. Conversely, the less volatile an asset, the less likelihood there is for any significant profit or loss from investing in that asset.

Risk is both a positive and a negative for an investor. There can be dangers in avoiding risk or not assuming enough risk. By increasing risk, you can potentially increase investment returns over the long-term but the price you pay will be increased volatility.

Securities and derivatives are generally more volatile than other asset classes; however, the markets for other asset classes are not necessarily as transparent as the stock market in terms of information available to investors, the process for continuously determining and making public the real market value of the particular asset. In general, the risks of investing can be categorised in the following manner. Please note that this list is not exhaustive.

**Market Risk**

This is the risk of loss by reasons of movements in a market sector. These can be caused by any number of factors including political, economic, taxation or legislative. Specific examples include changes in interest rates, political changes, changes in superannuation laws and internal crises or natural disasters. Market risk can be minimised by having a spread of investments across different types of assets.

**Global Risk**

This is the vulnerability of the company to international events or market factors. These would include movements in exchange rates, changes in trade or tariff policies and changes in the bond market.

**Sector Specific Risk**

The possibility that a particular investment may underperform the market or its competitors. This may be minimised by detailed research to identify quality investments, reviewing their performance and their place in a portfolio.

**Timing Risk**

The possibility that you enter the market at a bad time, e.g. just before a share price fall. This can be minimised by not investing all of your funds into the market at one time.

**Speculative Risk**

If your Adviser describes an investment as speculative you should be aware that the investment could rise significantly but also fall by the same degree. You should not invest in speculative investments unless you understand and accept the risks fully and are prepared to accept any resultant loss.

## Part Two -Schedule of Fees

### How are Representatives remunerated for services provided?

Representatives are remunerated by way of a commission / brokerage / fee split with Euroz Hartleys. The exact split of commissions, brokerage and fees varies based on a number of factors, but is within a range of 35% to 50% of the amount earned by Euroz Hartleys. For example:

If the **brokerage** for Australian securities was:

Transactional value		Fee (Inc. GST)	
\$ 0	to	\$ 5,000	2.35%
\$ 5,001	to	\$15,000	2.10%
\$15,001	to	\$50,000	1.60%
		\$50,001+	Negotiable

The **minimum fee** per contract note is \$132.00 inclusive of GST for each buy and sell transaction.

**E.g.** if you buy \$15,000 worth of BHP, then the following maximum fee could apply:

Transaction Value	\$15,000.00
Fee (\$15,000 x 2.1%)	\$315.00
Total amount payable	\$15,315.00

Fee (Excl. GST)	GST PAYABLE	35% SPLIT		50% SPLIT	
		PAID TO EUROZ HARTLEYS	PAID TO YOUR ADVISER	PAID TO EUROZ HARTLEYS	PAID TO YOUR ADVISER
\$120.00	\$12.00	\$78.00	\$42.00	\$60.00	\$60.00
\$286.36	\$28.64	\$186.14	\$100.22	\$143.18	\$143.18

### Fees and Charges for Advising and Dealing Services

Euroz Hartleys is remunerated by way of the brokerage, fees, charges and commissions it charges for each investment made by you. Brokerage charges are levied for each buy and sell transaction executed for you in securities, warrants, exchange traded options and international securities. A Confirmation of Transaction will be issued to you upon completion of each transaction, which will show the total brokerage charged and applicable government taxes.

All other fees detailed below, will be disclosed in your Statement of Advice (SoA).

All fees and charges are subject to change from time to time. We may change our fees and charges and publish any changes on our website [www.hartleys.com.au](http://www.hartleys.com.au).

Research is generally provided to you free of charge. In certain circumstances however, a fee may be charged. If we do charge a fee this will be disclosed in a SoA.

### Trading in listed securities and warrants

Transaction Value	Fee (Inc GST)
\$0 to \$5,000	2.35%
\$5,001 to \$15,000	2.10%
\$15,001 to \$50,000	1.60%
\$50,001 plus	Negotiable

A minimum fee of \$132 is charged for each buy and sell transaction (Inc. GST).

### Trading in listed Australian Exchange Traded Options

Transaction Value	Fee (Inc. GST)
\$0 to \$5,000	2.50%
\$5,001 to \$15,000	2.00%
\$15,001 to \$50,000	1.50%
\$50,001 plus	Negotiable

A minimum fee of \$132.00 is charged for each buy and sell transaction (Inc. GST).

### Griffin Portfolio Management Service Fees

The Griffin Portfolio Management Service is a comprehensive portfolio management and administration service that is suited to investors with a substantial portfolio (\$100,000+). If you subscribe to the Griffin Portfolio Management Service you may be charged the following fees.

1. The Fees are calculated daily on the day's ending balance (excluding cash and term deposits) as Euroz Hartleys Limited (Euroz Hartleys) determines, and are debited and payable on or about the fifth last Business Day of the month, as Euroz Hartleys determines. The fees are charged on a sliding scale and the rates are subject to variation by Euroz Hartleys upon giving written notification to the Client.
2. An Establishment Fee of \$220 (Inc. GST) will apply at the time of:
  - a) opening the client's Griffin Portfolio Management Service account; and
  - b) opening subsequent Griffin Portfolio Management Service accounts.
3. For Householded accounts, the total Fee will be based on the combined portfolio value of the Client's investments in all accounts. The pro-rata Fee will be charged to each account based on that account's value as a percentage of the combined value of all accounts. For Margin Lending accounts the Adviser Management Fee will not be incorporated into the Householding arrangements for the purposes of fee calculations.
4. In addition to the Fee, the Client will be responsible for other charges, costs and expenses levied by third parties in respect of activities in relation to the account, and for brokerage, trading commission and any other charges, costs and expenses payable by the client to Euroz Hartleys or the Sponsoring Participant or the Approved Broker. All applicable taxes in respect of the account, including Goods and Services Tax (GST), will be payable by the Client.
5. Euroz Hartleys reserve the right to charge an additional fee for carrying out duties that do not form part of the Services outlined in Section 2 of the Griffin Portfolio Client Agreement. The Client will be charged an hourly rate of \$55 for each hour or part thereof with a minimum fee of \$110 subject to variation in accordance with clause 9 of the Griffin Portfolio Client Agreement. Euroz Hartleys will notify the Client in advance if this fee is to be levied.
6. Where a portfolio includes leveraged products a flat dollar Adviser Management Rate will be applied in consultation with your Adviser.
7. A monthly administration fee of \$55 (including GST) will be charged to accounts trading in options ("Options Administration Fee").

Account Opening Fees per account	Griffin Portfolio Management Service - \$220 (Inc. GST)			Paid by client upfront and/or deducted from the amount invested.
	Portfolio Value	Adviser Management Rate (Inc. GST)	Griffin Administration Rate (Inc. GST)	Total Fee (Inc. GST)
Ongoing Management and Admin Fees (Griffin Portfolio Management Service)	\$0 to \$100,000	1.551%	0.374%	1.925%
	\$100,001 to \$125,000	1.628%	0.297%	1.925%
	\$125,001 to \$250,000	1.353%	0.297%	1.650%
	\$250,001 to \$500,000	1.067%	0.253%	1.320%
	\$500,001 to \$750,000	0.682%	0.198%	0.880%
	\$750,001 to \$1,000,000	0.726%	0.154%	0.880%
	\$1,000,001 to \$2,000,000	0.451%	0.099%	0.550%
	Over \$2 million	0.231%	0.099%	0.330%

\*\*\* Fees are charged on a sliding scale.

**For Example:** For an investment portfolio of direct Australian listed securities totaling \$600,000; the estimated ongoing fee would be \$8,649 p.a.

Subject to minimum monthly fee per Griffin Portfolio

Griffin Admin Fee (Inc. GST)	Adviser Management Fee (Inc. GST)
\$55	\$105.42

### **Underwriting and Placements**

We may receive fees from an issuing company when we lodge your successful application for investments in new issues. Details of the fee are provided at the time we send you the relevant prospectus or offer document and your Statement of Advice (**SoA**) but typically range from 1% to 6% of the capital raised. We may also underwrite these capital raisings. Your Representative may receive a fee for arranging this investment for you. This fee is typically 0.5% to 5% of the total fee received by us.

### **Off Market Securities Transfers**

Each buy and sell transaction may be charged at the rate of \$44 (Inc. GST).

### **Managed Investments**

These schemes typically charge establishment and ongoing management fees, and may also charge you for ongoing compliance costs. These rates will be disclosed to you in a Product Disclosure Statement and any SoA that we provide to you at the time you make the investment.

### **Margin Lending**

Margin Lending institutions charge varying interest rates, these will be disclosed in your SoA.

### **Cash Management Accounts**

Cash management companies and/or banks charge a variety of fees and varying rates of interest, which should be disclosed in any Product Disclosure Statement or brochure provided to you.

### **Fixed Interest**

Rates vary for these products; the exact rate will be disclosed in your SoA.

### **Life Insurance Products**

There is a broad range of commission rates in relation to these products. Rates will be disclosed in your SoA.

### **Financial Plan Preparation**

We will charge you a minimum of \$550 (Inc. GST) for the preparation of any Financial Plan. This fee may be increased if the Financial Plan is particularly complex. We will discuss this with you at the time of preparation of the plan and disclose the exact fee in your SoA. This amount is payable on completion of the Financial Plan and before any transaction occurs in relation to the implementation of the Financial Plan.

### **Remuneration Received from Other Entities**

We receive remuneration from financial product issuers and financial product providers. The table below highlights payments we may receive based on the value of your investment. Exact details of the remuneration we receive will be provided in your SoA.

To the extent permitted by law, Euroz Hartleys advisers may also receive alternative forms of remuneration such as the costs of maintaining their professional development qualifications. Euroz Hartleys 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 nonmonetary benefits that the adviser receives (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 Euroz Hartleys adviser.



Product	Commission/Rebate which we may receive from a product issuer or provider
Managed Funds	0% - 5.5% of the value of the investment (upfront commission) 0.2% - 1.1% per annum of the value of your investment (ongoing trail fee)
Margin Lending	0.25% to 0.50% of the margin facility (ongoing trail fee)
Warrants	0% - 5.0% of the value of the transaction issued on the primary market (incentive payment)
Fixed Interest	Approximately 0.25% of the investment (upfront commission)
Life Insurance Products	0% - 25% (upfront commission) 0% - 25% (ongoing trail fee)

## 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 and Chi-X Rules. Separate and additional to the above requirements, the Stockbrokers And Financial Advisers Association (“SAFAA”) 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 SAFAA, 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.

### SAFAA’s professional, ethical and education standards are contained in:

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

In order to ensure that its standards are met, SAFAA 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 SAFAA Complaints Form and addressed to:

Chief Executive  
 Stockbrokers And Financial Advisers Association  
 Level 6, 56 Pitt Street  
 Sydney NSW 2000

Or via 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.