



Financial Services Guide

Version 7

Date: 30 October 2025

Important Information

Financial Services Guide

This Financial Services Guide (FSG), is designed to clarify who we are and what we do, and to help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you;
- how we and our associates are paid and – any other benefits we may receive;
- any potential conflicts of interest we may have;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it's full of useful information – and is also worth holding on to for future reference. The Privacy Notification section is worthwhile reading as it gives you further clarity on how we handle your personal information. And of course, if you ever have any questions, please contact us.

Other documents you may receive

In addition to this FSG, if we provide you with financial advice we will also present you with a written Statement of Advice (SOA). This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the '**Contact us**' section of this FSG for our contact details.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the '**Contact us**' section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (e.g. fax, email or letter) or another method agreed with us.

Not Independent

Godfrey Pembroke Group Pty Ltd (Godfrey Pembroke) is not independent, impartial or unbiased because we may receive commissions on life insurance products we recommend to our clients.

About Us

Who we are

The following financial advice specialists are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you:

Anthony (Tony) Joseph Brosnan

Authorised Representative No. 241871

The Financial Services that the above financial advice specialists offer are provided by SA Portfolio Planners Pty Ltd ABN 49 008 163 522, trading as First Principles Financial Planning, Authorised Representative (AR) No. 242050.

Your financial advice specialists are Representatives of and offer services on behalf of Godfrey Pembroke.

Godfrey Pembroke has authorised your financial advice specialists to provide you with this Financial Services Guide.

About Godfrey Pembroke Group Pty Ltd

At Godfrey Pembroke Group Pty Ltd (Godfrey Pembroke), we are committed to delivering a comprehensive suite of financial advice services tailored to meet the diverse needs of our clients. Our network of experienced financial advice specialists brings deep technical expertise and a strong understanding of complex financial matters.

Since our establishment in 1981, Godfrey Pembroke has built a reputation for excellence, underpinned by a legacy of personalised service and a steadfast focus on our clients' goals. We are proud to be an adviser-owned and adviser-led licensee, where equity participation fosters a shared commitment to professionalism, accountability, and the delivery of high-quality financial advice. This structure ensures our advisers are actively engaged in shaping the direction, culture, and service standards of our group—reflecting our belief in the value of trusted relationships and enduring client outcomes.

Our financial advice specialists are representatives of Godfrey Pembroke Group Pty Ltd ABN 38 078 629 973 Australian Financial Services Licensee 245451, of Level 2, 26 Brisbane Avenue, Barton ACT 2600.

Our corporate authorised representatives are required to pay a flat fee to the licensee (Godfrey Pembroke) for the provision of licensing, compliance, and support services.

Our associations and relationships

If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC's Money Smart website (www.moneysmart.gov.au/investing/financial-advice).

Godfrey Pembroke financial advice specialists are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

Approved Product List

Our Approved Products List (APL) is a list of what we consider to be sound quality, fully researched products, but doesn't include all possible products available in the market. Only products and services that have been examined by our experienced research consultants are placed on our APL.

When selecting products for you, we are generally limited to the range of investment products and a selection of 12 insurance providers on the APL.

Your adviser will first source from the APL before providing any recommendations. They will only recommend a product or service after considering its appropriateness in relation to your individual objectives, financial situation, needs and best interests. Where your strategy requires products and services other than those on the APL to act in your best interests, our research specialists will be consulted and we will seek to find an alternative solution.

What we do

We are authorised by Godfrey Pembroke to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Superannuation
- Retirement Savings Accounts
- Securities
- Standard Margin Lending Facilities

Contact us

For more information on anything you have read in this document or if there is anything else we can help you with, please contact us at:

Address Level 9
 420 King William Street
 Adelaide SA 5000

Postal Address PO Box 3016
 Melbourne Street
 North Adelaide SA 5006

Phone 08 8456 9020

Email Adelaide@FirstPrinciplesFP.com.au

Your confidence in our advice

Your satisfaction is of paramount importance to us and we have procedures in place to resolve any concerns promptly, and fairly.

Our complaints procedure

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial advice specialist know in the first instance. You can also raise your complaint at any time by contacting us at:

Godfrey Pembroke Group Advice Dispute Resolution

Level 2, 26 Brisbane Avenue, Barton ACT 2600 or PO Box 583, Carlton North VIC 3054

Phone: 1300 856 286

Email: service@godfreypembroke.com.au

2. If your complaint isn't resolved within 30 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority Limited

GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Godfrey Pembroke holds professional indemnity insurance that satisfies the requirements of section 912B of the Corporations Act. This insurance also covers the conduct of financial advice specialists who were authorised by us at the time of your complaint but are no longer representatives of Godfrey Pembroke.

Payments and benefits we receive

At Godfrey Pembroke we believe you deserve transparency and we want to ensure all our recommendations are driven by your needs alone. This is why Godfrey Pembroke has led the industry in implementing a fee-for-advice model (back in 2006), and we will continue to do so. This model allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based on:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- by direct invoice from us for initial and ongoing advice;
- in some circumstances, where possible, as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- where applicable, we may be paid a commission by the financial product issuer(s);
- where applicable, via commission we may receive from a financial product provider when you commence an insurance contract and ongoing commission annually during the life of the insurance contract; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time. Please refer to the **“How we charge for our services”** section of this FSG for further information.

How is your advice specialist paid

Anthony (Tony) Joseph Brosnan is not an employee of Godfrey Pembroke. He is a Director/Shareholder of the corporate authorised representative, SA Portfolio Planners Pty Ltd, through which Tony operates his professional practice, and in addition to a salary, he may be entitled to other remuneration in the form of distributions, dividends, bonuses and profit share from his business.

GPG equity holding

Anthony (Tony) Joseph Brosnan is a director and through their related entity is a shareholder of GPG Unit Pty Ltd ACN 676 191 389, the parent company of Godfrey Pembroke Group Pty Ltd, which means they may receive dividends and/or income from the parent company. This ownership reflects our structure as an adviser-owned and adviser-led licensee, where equity participation supports our commitment to professionalism and the delivery of quality financial advice.

Further details on payments we may receive

You may request details of any fees, commissions or other benefits we receive in connection with any financial service we provide to you, even if personal advice is not given.

Benefits we may receive

In the course of providing advice, we may receive benefits from product providers. These benefits may include:

Conferences

Our financial advice specialists may attend conferences and professional development seminars that have a genuine education or training purpose. Godfrey Pembroke may pay for the costs of travel and accommodation, and events and functions held in conjunction with the conference or seminar.

Non-monetary benefits

Godfrey Pembroke and your financial advice specialist maintain a public register outlining the alternative forms of remuneration that are payable to, and by us e.g. benefits valued between \$100 and \$300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting your financial advice specialist.

Sponsorship

Godfrey Pembroke receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and we do not directly share in the sponsorship payment; however, we may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.

Referrals

Referrals from a third party

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Referrals to a third party

At present we do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

How we charge for our services

Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. All fees and commissions are inclusive of GST.

We have detailed a full range of fees below, but note that only fees applicable for the advice and services you choose will apply.

In complex cases the fees could be greater than those disclosed below. In these instances, we will inform you of the exact fee payable promptly in writing.

Note that we are now subject to requirements which mean we can only charge fees from your superannuation or pension account where the advice is in relation to that account. If you would like our fee deducted from your superannuation or pension account, we will discuss this with you to determine if it is appropriate for you.

Client Engagement <i>Meeting you and understanding your needs</i>	<p>Initial meeting \$780 for up to a 90 minute meeting.</p> <p>This will include collecting and processing information before and at the meeting, as well as the time required after the meeting dealing with file notes for compliance. If additional meeting time is required, then at \$110 per 15 minutes or part thereof.</p> <p>We then customarily follow the meeting with a written summary of our discussions, the scope of the advice, and next steps. If all the required information is available, this includes a Letter of Engagement that sets out the cost, for you to sign to accept the quote and engage us.</p>
Client Discovery <i>Ensuring that we have the facts to provide a sound basis for advice</i>	<p>Our Client Discovery process is a critical element and involves us gathering sufficient information about your situation, so we can provide you with details of our understanding of your position and requirements, along with a written cost estimate for the next steps and advice required (Letter of Engagement).</p> <p>Where not all of the required information to prepare the Letter of Engagement was available at the initial meeting, we would seek your instructions to undertake the required further discovery process.</p> <p>Typically, this cost would be included in the Advice fee.</p> <p>In exceptionally complex cases, we will quote a fee where an extensive due diligence process prior to advice is required.</p> <p>Usually, if we are satisfied that all of the required information has been provided and is available to us at the initial meeting, then we can issue the Letter of Engagement without additional cost.</p>

Advice Preparation <i>Confirming what you have asked, what we know and what we recommend you should do. Along with the key information to help you assess if the advice is right for you</i>	<p>Advice preparation fees will usually be set out in the Letter of Engagement.</p> <p>So that you are always clear about costs, in all cases we will simply agree a specific project fee or an hourly fee basis with you prior to commencing work.</p> <p>Circumstances, complexity and the extent of our involvement can vary significantly. We are required to state a range of minimum and maximum fees that may be charged across those widely varying situations.</p> <p>Typically, the minimum fee charge is \$4,700 while the maximum fee is up to \$13,200.</p> <p>Complex advice requirements, such the use of trusts and ownership structures, SMSF, executive share plan or multiple investment entities, overseas assets and incomes, etc., tend to result in higher fees.</p> <p>Where advice is limited only to Aged Care, the typical fee is between \$3,000 and \$8,000, depending upon scope and complexity.</p>
Implementation <i>Helping you put the recommendations into action</i>	<p>If we assist you to Implement advice provided to you, or assist you by providing other services, there may be a fee applicable.</p> <p>So that you are always clear about costs, Implementation costs will usually be set out in your Advice document. This allows you to have a clear understanding of the cost of implementing our advice before making a decision to do so.</p> <p>Circumstances, complexity and the extent of our involvement can vary significantly. We are required to state a range of minimum and maximum fees that may be charged across those widely varying situations.</p> <p>Typically, the minimum fee charge is \$1,210 while the maximum fee is up to \$13,200.</p>

<p>Services</p> <p><i>Keeping you up to date, being here for you when needed and helping keep things on track</i></p>	<p>Where you are seeking assistance that doesn't form part of our implementation of advice or does not require advice, we would regard this as the provision of a Service.</p> <p>You can elect to enter into a 12-month Client Service Agreement (Agreement) as part of your financial planning strategy so you can receive services such as a meeting to review your plan. Details of the services will be set out in your Agreement.</p> <p>Circumstances, complexity and the extent of our involvement can vary significantly. We are required to state a range of minimum and maximum fees that may be charged across those widely varying situations.</p> <p>Typically, the minimum fee charge is \$4,700 while the maximum fee is up to \$39,600. The fee applied will be commensurate to the level of service needed and the complexity of the advice provided and will be explained and agreed with you in the Agreement.</p> <p>If you choose <u>not</u> to adopt a 12-month Client Service Agreement or request services outside of the scope of that Agreement, there may be a fee applicable.</p> <p>So that you are always clear about costs, in all cases we will typically agree a specific project fee or an hourly fee basis with you prior to commencing work. If this is charged on a time used basis the hourly rates are shown below.</p> <p>Hourly rates as follows</p> <table> <tbody> <tr> <td>Principal Adviser</td> <td>\$ 485</td> </tr> <tr> <td>Associate Adviser</td> <td>\$ 355</td> </tr> <tr> <td>Paraplanner</td> <td>\$ 245</td> </tr> <tr> <td>Client Service</td> <td>\$ 180</td> </tr> <tr> <td>Administration</td> <td>\$ 105</td> </tr> </tbody> </table>	Principal Adviser	\$ 485	Associate Adviser	\$ 355	Paraplanner	\$ 245	Client Service	\$ 180	Administration	\$ 105
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<p>Execution Only Service</p>	<p>Where we simply provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, this is termed an Execution Only Service. This is charged on a time used basis.</p> <p>Hourly rates as follows</p> <table> <tbody> <tr> <td>Principal Adviser</td> <td>\$ 485</td> </tr> <tr> <td>Associate Adviser</td> <td>\$ 355</td> </tr> <tr> <td>Paraplanner</td> <td>\$ 245</td> </tr> <tr> <td>Client Service</td> <td>\$ 180</td> </tr> <tr> <td>Administration</td> <td>\$ 105</td> </tr> </tbody> </table>	Principal Adviser	\$ 485	Associate Adviser	\$ 355	Paraplanner	\$ 245	Client Service	\$ 180	Administration	\$ 105
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Insurance Products

Fee Based

To date it has proved complex and difficult to provide personal Insurance advice for a fee. However, it is our goal to do so.

At present, in most instances we would receive a commission for arranging life insurance products for you. We would always provide specific details of that commission, in writing, in our advice to you.

However, in order to offer a true fee based Insurance service, we will offer you the option of paying an agreed fee and in turn we would then rebate our commission to you, with the aim of applying that rebate to reduce the applicable premiums for your Insurance.

Commission Based

If you choose not to adopt fee based Insurance service, or have pre-existing Insurance arrangements in place, then the following may apply.

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commission between 0% and 66% and ongoing commission between 0% and 22% to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

Date policy is issued	Initial Commission (% of annual policy cost including GST)	Ongoing Commission (% of annual policy cost including GST)
Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)	up to 130%	up to 33%
From 1 January 2018	up to 88%	up to 33%
From 1 January 2019	up to 77%	up to 33%
From 1 January 2020	up to 66%	up to 22%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

Example (all figures include GST):

You purchase the policy for \$1000 on 1 December 2019. We may receive an initial commission of up to \$770 (\$1000 x 77%) in the first year and ongoing commissions of \$330 per annum (\$1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of \$500, we may receive an initial commission of up to \$330 (\$500 x 66%). The ongoing commissions on the additional cover may be up to \$165 (\$500 x 33%). This is in addition to the ongoing commissions of \$330 per annum when the policy was purchased. Total ongoing commissions payable to us may be up to \$495 (\$1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by the product provider and are not an additional cost to you

Privacy Notification

Your personal information will be handled in accordance with our privacy policy, which is located on our website. We will generally collect personal information directly from you. We may collect personal information about you from a third party if we believe you have authorised that third party to provide the information to us.

The main reason we collect, use and/or disclose your personal information, is to provide you with the services that you request. In addition, as a financial service provider, we are obligated to verify your identify and the source of any funds.

We provide financial services under the Australian Financial Services License of Godfrey Pembroke Group Pty Ltd who monitors our compliance with the law and provides us with a range of support services, including the financial planning software we use. As a consequence, Godfrey Pembroke has access to your personal information and may use that information to facilitate the provision of financial services to you and to ensure we are complying with our obligations.

We may also disclose your information to external parties such as your accountant, banks, insurers, and product providers.

Please refer to our Privacy Policy For more information about how we will handle your personal information, including how to access or correct your personal information.

Complaints

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal with these complaints, by reading our Privacy Policy (by contacting us) or by referring to the '**Your confidence in our advice**' section of this FSG.

Further information

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the '**Contact us**' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at oaic.gov.au

Professional Year

I would like to introduce Alex Hogg, who is undertaking the supervised Work and Training Professional Year Program at First Principles Financial Planning under Godfrey Pembroke Group.

What is the Professional Year?

Our commitment to our clients and our community is a higher standard of professionalism across our industry. A Professional Year for New Entrants aims to support our next generation of Advisers to be appropriately trained and supervised on their pathway to becoming a professional Financial Adviser.

The Professional Year program provides a practical environment for new entrants to financial planning to develop skills and knowledge progressively while working closely with an experienced adviser. All Professional Year participants must undertake 1,500 hours of supervised work activities and 100 hours of training.

Alex is undertaking his Professional Year program and, as their supervisor, I am responsible for supervising all his work and training activities. Note, all financial advice continues to be provided under my name given I am supervising his work.

As part of the Professional Year, Alex may complete the following activities:

- Attend and conduct client meetings with me, or on their own when this meets requirements of the Professional Year
- Model strategies and research products to determine their suitability to meet client objectives, financial needs and personal situations
- Participate in administrative tasks that support the delivery of trusted advice
- Prepare relevant documentation, including your advice presentation documents

At First Principles Financial Planning, your privacy is of the utmost importance to us, and all our staff, including Alex, are appropriately trained to ensure your privacy is maintained throughout our advice relationship. This includes any of the activities Alex may undertake as part of his Professional Year.

If you have any concerns with the above arrangement, or if you do not agree to Alex undertaking some or all of the above activities as part of the financial advice relationship we provide you, please advise me directly.

Thank you for your support of our business and our efforts to grow the professionalism of advice across Australia. And a special thank you for supporting Alex in this significant step in his career.

Should you have any questions regarding the Professional Year, please don't hesitate to contact me.

Yours sincerely,



Tony Brosnan CFP®, Dip.FP, ProfCert SMSF, SSA, FAAA Aged Care Specialist™

Financial Adviser

SA Portfolio Planners Pty Ltd trading as
First Principles Financial Planning ABN 49 008 163 522
Authorised Representatives Godfrey Pembroke Group Pty Ltd
ABN 38 078 629 973 AFSL 245451