

Financial Services Guide

Version 2.5

Date prepared: 14 July 2025



Introduction

It is important that you read this Financial Services Guide (FSG). It contains information that will help you decide whether to use any of the financial services offered by us (Financial Keys Pty Ltd), as described in this guide, including:

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

Documents you may receive

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

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

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

If we recommend or arrange a financial product for you we will provide a product disclosure statement (PDS) where relevant. These documents contain the key features of the recommended product, such as its benefits and risks as well as the costs you will pay the product provider to professionally manage that product.

Not Independent

Financial Keys Advice may receive commission payments on Life Insurance Products for some clients. This allows us to advise and place insurance without charging the relevant client directly but rather receiving remuneration from product issuers. By doing this we are not allowed to use the words Independent, Impartial or Unbiased when describing our business. For more information on this please ask your adviser.

About our practice

Financial Keys is a dynamic firm of professional financial advisers with extensive industry experience. Our business has been established for more than 20 years, servicing clients who are located throughout Australia and overseas.

Developing lasting relationships with clients is at the heart of what we do. It allows us to craft financial plans that are as unique as the individuals we serve – designed around their particular style and situation, goals and definition of success.

We are relentlessly focused on the best interests of our clients. For us, everything starts with working with the right people. To help us achieve our clients' goals we hand pick the very best people – not only in terms of exemplary technical ability, but extending to values, character, integrity and a genuine interest in people.

We specialises in providing tailored financial advice solutions to select individuals and family groups. We also provide corporate superannuation and insurance solutions to companies and their employees.

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|---|------------------------|
| Name | Financial Keys Pty Ltd |
| Australian Business Number | 71 089 066 955 |
| Authorised representative number | 411141 |

Office contact details

| | |
|----------------|--|
| Address | Suite 10.01, Level 10, 14 Martin Place, SYDNEY NSW 2000 |
| Phone | 02 92 333 888 |
| Email | reception@financialkeys.com.au |
| Website | www.financialkeys.com.au |

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

Our advice and services

We can provide you with personal and general advice about specific services and financial products listed below.

Financial Keys Advice is responsible for the financial services provided including the distribution of this FSG.

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

The following table sets out the areas of advice we can help you with as well as the products and services we can arrange. We are able to provide advice and services in relation to your superannuation and investments up to a maximum value only. Should you require advice and services that extend beyond the scope of our services, we can refer you to a suitably qualified financial adviser.

Financial Keys Advice is not controlled by any financial institution/s such as a fund manager, bank, insurance company or trade/credit union. None of these institutions has a vested interest in our business and are not therefore in a position to influence us in the provision of advice.

Any additional advice or services we can offer you, or limitations to the list below, will be outlined in **Our Financial Advisers** on page 10.

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

FKA maintains an approved products and services list, which includes a diversified selection of approved Australian and International fund managers. These have been researched by external research houses as well as our in-house research team.

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

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

Tax implications of our advice

Financial Keys is authorised by ASIC to provide tax (financial) advice services on matters that are directly related to the nature of the financial planning advice provided to you. We will not consider any other tax matters in our advice to you. Where tax implications are discussed they are incidental to our recommendations and only included as an illustration to help you decide whether to implement our advice.

Your relationship with us and using our services

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

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

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

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

Providing information to us

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

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

Possible consequences of not providing this information

You are of course at liberty to decline to provide some or all of this information, but if you do not provide it, we may not be able to:

- Provide you with the product or service you want,
- Manage or administer your product or service
- Verify your identity, which may not protect you against fraud,
- Advise you of other products or services that may better meet your financial needs and lifestyle goals.

Information we maintain on file and for how long

We need to hold all information you give us for a period of 7 years. Yes you can view information held by making a request.

Our fees

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

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

Our agreed advice and service fees may include charges for:

- Initial advice; and
- Ongoing advice.

Payment methods

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

- EFT, or cheque; and
- Deduction from your investment.

All fees and commissions will be paid directly to FKA as the licensee. They retain an amount (a licensee fee) to cover their licensee costs and the balance is passed on to us.

For details of our service fees, please refer to **Schedule of fees** below.

Other costs

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

Other benefits we may receive

From time to time advisers may receive non-monetary benefits from product providers. This can range from small benefits such as movie or sporting event tickets to more valuable benefits such as sponsorship to attended conferences.

If the value of any of these benefits exceeds \$300 it will be recorded in the Alternative Remuneration Register. A register will be maintained by Financial Keys Advice for any benefits received by them that exceed \$300, and each individual adviser will maintain a register for any benefits that they receive directly and are valued at more than \$300. A copy of the register will be available for inspection on request.

Relationships and associations

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

About our licensee

Financial Keys Advice Pty Ltd

ABN 70 626 699 607

Australian Financial Services Licensee No: 509930

Our referral arrangements

We receive no payments if we refer you to other service providers.

Our other business activities and relationships

In addition to providing the services listed in this guide, we have a relationship with Financial Keys Consulting Services Pty Ltd which provides SMSF administration services. FKA has no involvement in these activities and is not responsible for any services, advice or products provided by this business.

Confidence in the quality of our advice

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

- Contact your adviser and tell them about your complaint.
- If your complaint is not satisfactorily resolved within 7 days please contact Financial Keys Advice within 7 days via phone no's 02 9233 3888 or put it in writing and send to Suite 10.01, Level 10, 14 Martin Place, SYDNEY NSW 2000.
- If your complaint has not been resolved satisfactorily with 30 days, you may escalate your complaint to one of the following External Dispute Resolution Schemes listed below.

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

You may also contact the **Australian Securities & Investments Commission (ASIC)** on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights. You can also contact the **Financial Planning Association (FPA)** at <https://fpa.com.au/professionalism/complaints-for-consumers/> to make a complaint (please note that the FPA cannot award compensation).

Professional indemnity insurance

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

Your privacy

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

Privacy Collection Statement

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

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

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

- Your adviser and FKA may have access to this information when providing financial advice or services to you;
- Your adviser may, in the future, disclose information to other financial advisers, brokers and those who are authorised by FKA to review customers' needs and circumstances from time to time;
- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist your adviser in providing financial advice and services to you.
- Your information may be disclosed as required or authorised by law and to anyone authorised by you.

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

For a copy of the Privacy Policy visit www.financialkeys.com.au or you can contact us.

Our Financial Advisers

About Brendan Gallagher

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| Experience | Brendan has over 25 years of experience in financial services. He has been a Principal and Adviser with Financial Keys since 2003. Brendan specialises in providing wealth creation and wealth protection strategy advice to CEO's, executives, high net wealth Individuals, ex-pats and leading Australian companies. |
| Qualifications | <ul style="list-style-type: none">• CFP® Certified Financial Planner™• Advanced Diploma of Financial Services (Financial Planning)• Diploma of Superannuation Management• Master of Business Administration• Bachelor of Commerce (Economics)• Direct Equities Advisory Accredited• Self-Managed Super Fund Accredited• Margin Lending Accredited |
| Memberships | Financial Planning Association of Australia |
| Phone | 02 92 333 888 |
| Email | bgallagher@financialkeys.com.au |
| Authorised representative number | 411143 |

The advice and services I can provide

I am authorised to provide all the services listed in the **Our advice and services** section

How I am paid

I am paid a salary. An entity associated to me has equity in Financial Keys and may receive capital and profit related benefits.

My other business activities and relationships

In addition to providing the services listed in this guide, I have a relationship with Financial Keys Consulting Services Pty Ltd. FKA has no involvement in these activities and is not responsible for any services, advice or products provided by this business.

I control a percentage of the equity interests in the business providing the services listed above. As a result, I may benefit from fees, dividends or income received from the business's profits that may result from any payments or other benefits received in respect of the services provided to you.

About Matt Congiusta

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| Experience | Matt has over 14 years of experience in financial services, including more than 9 years with Financial Keys. He is a Principal and Adviser at Financial Keys. Matt specialises in managing the needs and financial strategies of executives, medical professionals, high net worth individuals, retirees and wealthy family groups. Matt's focus is on placing the client first and ensuring all aspects of their financial lives are in order. |
| Qualifications | <ul style="list-style-type: none">• CFP® Certified Financial Planner™• Advanced Diploma of Financial Planning• Bachelor of Business (Financial Planning)• Bachelor of Computing• Direct Equities Advisory Accredited• Self-Managed Super Fund Accredited• Life Insurance Accredited• Margin Lending Accredited |
| Memberships | Financial Planning Association of Australia |
| Phone | 02 92 333 888 |
| Email | mcongiusta@financialkeys.com.au |
| Authorised representative number | 413479 |

The advice and services I can provide

I am authorised to provide all the services listed in the **Our advice and services** section

How I am paid

I am paid a salary and may be paid a bonus based on my performance.

My other business activities and relationships

In addition to providing the services listed in this guide, I have a relationship with Financial Keys Consulting Services Pty Ltd. FKA has no involvement in these activities and is not responsible for any services, advice or products provided by this business.

I control a percentage of the equity interests in the business providing the services listed above. As a result, I may benefit from fees, dividends or income received from the business's profits that may result from any payments or other benefits received in respect of the services provided to you.

Schedule of fees

These prices should be used as a guide only. We will discuss your individual needs and agree our fees with you. The actual agreed fees will depend on factors such as the complexity of your circumstances and goals and the scope of the advice.

Initial service fees

These are fees paid when you have agreed to receive our advice:

| Initial service | Fee amount |
|---|---------------------------|
| Financial Plan preparation, research and implementation | Between \$5,500 – \$9,900 |

Ongoing service fees

We provide ongoing services to help you stay on track to meet your goals. The cost of these services are as follows:

| Ongoing service | Fee amount* |
|--------------------------|---|
| Ongoing adviser services | 1.00% for the first \$1,000,000 of your portfolio balance. Fee discounts provided above \$1,000,000. |

*Minimum annual fee of \$10,000 applies

Commissions

We do not receive commissions on investments through new superannuation, managed funds or retirement products. However, some products, particularly older products, may attract commissions.

Any commission amounts will be disclosed to you when providing my advice. The following table is a guide of commissions we may receive.

| Product type | Initial commission | Ongoing commission | Example |
|--|--|---|--|
| Insurance (including those held within superannuation) | Up to 77% of the first year's premium for new policies implemented from 1 January 2019. | | On insurance policies implemented from 1 January 2019, if your insurance premium was \$1,000, we would receive an initial commission of up to \$770. |
| | We may receive up to 88% of the first year's premium for new policies implemented between 1 January 2018 and 31 December 2018. | Up to 30% of the insurance premium each following year. | |
| | We may receive commissions on increases or additions to existing policies of up to 85%. | | We would receive an ongoing commission of up to \$300.00 pa. |

All fees and charges include GST.

If an agreed advice fee is charged then we may rebate all or some of the commission.