VERSION 4.0 · 13 JULY 2026

Financial Services Guide.

Part 1 (General)

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Enlightened Financial Solutions Pty Ltd (EFS)

AFSL
502 728

ABN
81 600 104 354

LOCATION
54 Gordon Street, Mackay QLD 4740

About this Financial Services Guide

This Financial Services Guide (FSG) provides you with important information about Enlightened Financial Solutions Pty Ltd (EFS), and its Authorised Representatives, who will provide you with the financial services described in this FSG. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this FSG. We suggest you retain this FSG for your future reference. If any part of this FSG is not clear, please speak to your financial adviser.

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Enlightened Financial Solutions Pty Ltd (EFS) ABN 81 600 104 354
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This FSG consists of two parts. Part 1 of this FSG contains important information about:

> the financial services we offer as Authorised Representatives of EFS;
> EFS as the holder of an AFSL;
> the financial services that EFS offer;
> the process we follow to provide financial services;
> how we, our associates, and EFS are paid;
> any arrangements which may influence our advice to you;
> how we and EFS protect your privacy; and
> who to contact if you have a complaint or if you are not satisfied with the services provided.

Part 2 of this FSG is an Adviser Profile and includes information on the services we are authorised to provide on behalf of EFS.

References in this FSG to ‘me’, ‘I’, ‘us’, ‘we’ and/or ‘our’ should be read as either EFS or your ‘Authorised Representatives’ of EFS, as the context requires.

NON-INDEPENDENCE

We do not refer to ourselves as independent, impartial, or unbiased in relation to the provision of personal advice because.

> We may receive commissions when you purchase life insurance products that we have recommended, as explained in this FSG under the heading “Life Insurance Products”.

> Your adviser may hold shares in Vivid Holdco Limited, Viridian Financial Group Limited’s (VFGL) ultimate holding company and benefit from dividends or capital growth earned from revenue, which includes commissions or benefits from product providers.

> We benefit indirectly from fees paid to Infinity Asset Management when you invest in Separately Managed Funds, as it is a subsidiary of VFGL.

> We only provide advice in relation to products on our Approved Product List, which includes Separately Managed Funds, unless we consider it in your best interests to use a different product to meet your needs and objectives.

> Recommendations are always made with the client’s best interest and in accordance with the FASEA Code of Ethics.

PART 1

About EFS

Part 1 contains the following sections:

> Financial Services Guide (Section 1);
> Privacy Statement (Section 2); and
> Are you satisfied? (Section 3).

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG, which we, as Authorised Representatives, are required to provide.

Who provides the financial services described in the FSG?

EFS holds an AFSL issued by the Australian Securities and Investments Commission.

As an Authorised Representative, we act on behalf of EFS when providing the financial services, we are authorised to provide under EFS's AFSL. Further information on these services is set out in the FSG Part 2 Adviser Profile.

As the holder of an AFSL, EFS is responsible for the financial services we provide to you. EFS acts on its own behalf when these financial services provided to you.

Enlightened Financial Solutions formerly named Magnitude began on the 1st April 2007.

We believe that quality financial advice improves a client's lifestyle and financial outcomes throughout their life. No matter if it's young families and wealth accumulators or those who are pre-retirees and the already retired, we have seen people at every stage of their life benefit from getting quality Financial Advice.

We believe that quality advice provides a stronger direction to achieving goals, aspirations and dreams; a greater level of security and above all else, the peace of mind that people seek to have with their finances.

We have professional interests across all areas of finance, financial advice, business, accounting and economics. These broad and diverse interests allow us to have meaningful conversations with many different clients in all areas of their Financial Advice needs. When we meet with you, we look to have meaningful, realistic and genuine conversations to address yours needs today and tomorrow.

What relationships do we have?

Viridian Financial Group Limited (VFGL) (ABN 67 605 994 741) is wholly owned by Vivid Holdco Limited (ABN 91 688 345 940). VFGL owns 100% of EFS. This shareholding entitles VFGL to 100% of the annual profits generated by EFS.

VFGL is made up of a number of entities that provide financial advice, funds management, lending, and administrative services.

VFGL owns 100% of Infinity Capital Solutions Pty Ltd (ABN 41 621 447 345) (AFSL 515 762) (ICS), and ICS provides a range of wholesale financial products and services for its clients including but not limited to investment funds and tailored portfolio solutions.

Subsidiaries of VFGL structured as departments of ICS, include Infinity Asset Management Pty Ltd (ABN 50 618 545 172) (IAM) Infinity Portfolio Management Pty Ltd (ABN 95 666 790 227) (IPM) and Infinity Capital Finance Pty Ltd (ABN 71 639 278 032) (ICF). EFS may refer its clients to ICS where they may benefit from ICS' products & services.

VFGL also owns 100% of Viridian Lending Pty Ltd (ABN 77 104 755 839) and 25% of Sphere Finance Pty Ltd (ABN 97 165 012 564). The remaining ownership interest is not held by an entity associated with the Viridian Group. EFS may refer clients to Viridian Lending where applicable.

SECTION 1

Financial Services Guide

What other information should you consider before deciding whether to proceed with our recommendations?

If you receive personal financial advice this will be documented in a Statement of Advice (SoA), or in specific circumstances a Record of Advice (RoA), that confirms the discussions you have had with us, the recommendations we are making and the basis for those recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations with financial product providers.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

Who provides the financial services described in the FSG?

The financial services described in this FSG are provided by us as Authorised Representatives of EFS. Part 2 of this FSG contains further details about your financial adviser, and our experience, qualifications and professional memberships.

What financial services do we offer?

EFS is authorised to provide financial product advice and deal in the financial products, and offers the services (unless otherwise stated in Part 2 of this FSG), below.

FINANCIAL PRODUCTS

> basic and non-basic deposit and payment products
> derivatives (including warrants)
> debentures, stocks or bonds issued or proposed to be issued by a government
> life products
> interests in managed investment schemes (including investor directed portfolio services and alternative investments)
> retirement savings accounts
> superannuation (including Self-Managed Superannuation Funds (SMSFs))
> securities
> standard margin lending facilities (including structured investments)

SERVICES YOU CAN ACCESS

> financial planning advice;
> wealth accumulation advice;
> income and asset protection;
> superannuation advice, including self-managed superannuation funds;
> pre and post retirement
> redundancy advice;
> business succession planning
> retirement advice;
> debt management advice;
> cash flow advice;
> strategic debt management;
> aged care advice;
> social security benefits advice;
> life and disability insurance advice;
> estate planning services (financial planning); and
> Managed discretionary account services (refer below)

Managed Discretionary Account Service

We may offer you a Managed Discretionary Account (MDA) Service if appropriate, in accordance with an investment program agreed with you ('Investment Program'). EFS is not a direct MDA provider; instead, we act as an intermediary and refer you to the MDA service provider, managing the relationship on your behalf. The Investment Program will be documented in a Statement of Advice (SoA) which will detail our advice and how it will assist you in meeting your objectives.

Should you wish to use our advisory services, we may provide you with an SoA which contains our recommendations to you and this may include a recommendation for you to use Implemented Portfolios Limited as the MDA Provider. If you accept our MDA recommendation you will be given a Financial Services Guide and PDS prepared by Implemented Portfolios Limited. If you choose to accept Implemented Portfolios as the MDA Provider, you must acknowledge the recommendations by signing the Authority to Proceed provided with your SoA, enter an Enlightened Financial Solutions Service Agreement, and enter into an MDA Contract which authorises Implemented Portfolios to transact on your behalf within the MDA service.

What products are available?

A range of financial products offered by many leading financial product providers are available for recommendation by us. Details of the available products we can recommend are contained in the Approved Product List (APL). Internal and external experts provide financial product research, which is used to carefully select and maintain an extensive list of Approved Products for us to select from. We conduct due diligence on external research report providers that provide us with research. We will only recommend a product to you after considering its appropriateness to your individual objectives, financial situation and needs. The recommendations will be made after conducting an investigation into the financial products and may require us to investigate and consider a financial product which is not on the APL.

How do we ensure the advice we give you suits your needs and objectives?

To ensure we provide advice suitable for your needs and financial circumstances, we firstly need to understand your financial situation, personal financial objectives and needs. We will follow a step-by-step process as outlined below:

1. We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services we can offer.
2. We will collect all the information we need from you, including your personal financial situation, financial objectives and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing your full personal information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter you request.
3. We will help you identify your goals and may discuss your attitude towards investment risk.
4. We may consider strategies and areas such as income, social security, insurance, cash and estate planning requirements. Where required we will also conduct a reasonable investigation of the financial products that may be suitable to implement the strategies as part of the recommendations. Based on these and other considerations, we will prepare and present you with a written SoA, or in some cases depending on the circumstances, an RoA. We will explain in the SoA (or RoA) the basis for the advice, and any remuneration, benefits or associations which could have influenced the advice. Where we recommend financial products, we will provide you with a PDS or other disclosure document containing information about each product recommended, to help you make an informed decision about whether to purchase that product.
5. We will discuss our recommendations with you, make any changes you require and gain your agreement to implement those recommendations.
6. We will then implement those recommendations.
7. We will meet with you periodically to review your financial circumstances if we agree to an ongoing fee arrangement which includes a regular review component. If an ongoing fee arrangement is entered into, this will be documented in your Ongoing Fee Arrangement Consent and/or SoA. Where you have entered into an ongoing fee arrangement, we will renew your arrangement every year.

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further.

In certain circumstances, we may not provide you with personal advice via a SoA or RoA, as outlined above. These circumstances may include:

1. Where we provide you with only general advice, such as through seminars and newsletters;
2. Further advice or verbal advice – if you previously received advice recorded in a SoA, any further personal advice provided by us may be recorded in a RoA. We will not necessarily provide you with a copy of the RoA unless you request it (see below)

How we charge for our services

What documents do you get if we provide further advice?

Where a further review is conducted and personal advice is provided, in some circumstances we are not required to provide you with a SoA for this further advice. Where this is the case, if you have not already been provided with a RoA, you may request a copy of the RoA from us by contacting us (on any of the contact details set out in Part 2 of this FSG) for a period of seven years from when the further advice was first provided to you.

How can you instruct us?

You may specify how you would like to give us instructions, for example, by phone or email using any of the contact details set out in Part 2 of this FSG. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

Other services

We do not provide services other than financial planning services. Examples of the services which EFS is not responsible for include:

- general insurance services (e.g. car insurance);
- real estate and direct property advice;
- taxation services, such as completion of tax returns;
- accounting and audit services;
- legal services;
- credit activities
- consulting services; and
- administration and compliance of Self-Managed Superannuation Funds.

What fees, commissions, payments and other benefits do we receive?

We and EFS may receive fees paid by clients; commissions paid by product providers; other payments by product providers; and other benefits. All fees and commissions are payable (as directed by your Authorised Representative) to EFS.

Details of any fees, commissions or other benefits that we, EFS or other associated persons are entitled to receive if you implement our recommendations in relation to a specific financial product, will be disclosed to you in your SoA or RoA when personal advice is given.

Service fees

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination, or part of, any of these fees.

Fees for advice

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement to the fees before we provide you with advice.

Ongoing advice fees

We may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be agreed with you and is either a set amount, or an amount based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio and circumstances.

Referral fees

If we refer you to a person or company within or outside the Viridian Group, we may receive a referral fee if the law permits us to do so. A referral fee may be a percentage of the total amount invested or paid as a flat fee. For specialist insurance advice referrals, the referral fee may be up to 25% of the initial insurance commission. Any lawfully permissible referral fee will be disclosed to you in your advice document (SOA or ROA), or by another permitted mode of disclosure.

Payment methods

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods. Where it is debited from your investments it is normally referred to as the Adviser Service Fee. In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

COMMISSIONS

Life insurance products

We may receive initial and ongoing commissions from the insurance product issuer.

> Initial commissions are typically paid in the first year the policy is issued.

> Ongoing commissions are paid in subsequent years while you hold the policy.

If you request an increase to your insurance cover, we may also receive commissions on the increased portion of the premium.

For policies issued prior to 1 January 2018, higher commission caps may apply in limited circumstances, such as when exercising contractual options for additional cover or correcting an administrative error.

POLICY ISSUE PERIOD	INITIAL	ONGOING
Before 1 January 2018	140%	38.5%
1 Jan 2018 – 31 Dec 2018	80%	20%
1 Jan 2019 – 31 Dec 2019	70%	20%
From 1 January 2020	60%	20%

Maximum commission rates that may apply (excluding GST). "Initial" is a percentage of the first-year premium; "ongoing" is per annum while the policy is held.

Details of how your policy cost is calculated are contained in the relevant Product Disclosure Statement (PDS). Where we provide personal advice, details of commissions payable will also be disclosed in your advice document (SOA or ROA).

These amounts are not paid directly by you and are built into the cost of the product. We only receive commission where we are entitled to do so under existing arrangements with the product issuer. Life insurance commissions are generally paid to us on a monthly basis.

EXAMPLE

On insurance policies implemented from 1 January 2020, if your insurance premium was $1,000, we would receive an initial commission of up to $600 (excluding GST). We would receive an ongoing commission of up to $200 pa or $16.67 pm (excluding GST).

If level commission model is applied, we may receive an ongoing commission generally up to 31% (excluding GST) of the annual premium, rather than a higher initial commission. This is paid by the insurer while the policy remains in force and is not an additional fee paid by you.

We may also receive non-monetary benefits from life insurers, such as education, training, and business support, provided these benefits are relevant to the provision of advice and do not influence the advice we give. These arrangements do not increase the cost of your insurance.

Other benefits

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued up to $300 and other benefits that relate to information technology software or support provided by a product issuer or that relate to educational and training purposes. A copy of the register is available on request for a small charge.

What arrangements may influence our advice to you?

EFS has a formal referral relationship in place with Australian Retirement Trust (ART) to provide advice to ART members. There are no financial incentives in place in respect to this arrangement.

Implemented Portfolios is a Managed Discretionary Account (MDA) service provider. EFS advisers are authorised to make recommendations to clients to utilise this MDA service where it is deemed to be in the client's best interest. There are no financial incentives in place in respect to this arrangement.

Any other relationships or associations we have that may influence our advice to you will be disclosed in Part 2 of this FSG.

SECTION 2

Privacy statement

We comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

Why we collect your personal information

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.

We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

Collecting and disclosing your personal information

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy. Our privacy policy is available at www.efsmackay.com.au. It covers:

> how you can access the personal information we hold about you and ask for it to be corrected;

> how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and

> how we collect, hold, use and disclose your personal information in more detail.

EFS is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations.

Do we disclose personal information overseas?

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

We may disclose your personal information to a recipient which is located outside Australia. This includes any financial institution which you hold an account with overseas where you have given us permission to make enquiries on your behalf.

Other important information

We will update our privacy policy from time to time. Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

We may disclose your personal information to any company within the Viridian Group of companies as well as third parties we engage to do something on our behalf such as our agents, contractors, and external service providers, that assist us with our business in creating or implementing your financial plan. This will include external product issuers and complaints bodies to whom a complaint relating to a product or service is referred to, any party acquiring an interest in our business and anyone acting on your behalf.

SECTION 3

Are you satisfied?

EFS endeavors to provide you with quality financial advice.

If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

01 Contact your advisor first about your concern.

02 If your concern is not resolved to your satisfaction, you may contact EFS by writing:

Advice Complaints
Enlightened Financial Solutions Pty Ltd
54 Gordon Street Mackay, QLD, 4740
PO Box 1983, Mackay 4740
Email: info@efsmackay.com.au

We aim to resolve complaints as quickly as possible, and in any circumstance within 30 days. If your complaint is taking longer to resolve, for example due to complexity or the availability of information from third parties, we will let you know the date by which you can reasonably expect a response.

03 If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers. You may contact AFCA on:

Website: www.afca.org.au · Email: info@afca.org.au
Phone: 1800 931 678 (free call)
In writing to: Australian Financial Complaints Authority Limited, GPO Box 3 Melbourne VIC 3001

04 Australia's corporate, markets and financial services regulator, the Australian Securities and Investments Commission (ASIC), also has a free call information line on 1300 300 630 which you may use to make a complaint or to obtain information about your rights.

You may also contact ASIC by writing to: Australian Securities & Investments Commission, GPO Box 9827, Melbourne VIC 3001 · Website: www.asic.gov.au

Contact us.

Contact us for more information on anything you have read in this document, or if there is anything else we can help you with.

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