

# FINANCIAL SERVICES GUIDE

MANAGED DISCRETIONARY ACCOUNT (MDA) SERVICES  
SEPARATELY MANAGED ACCOUNT (SMA) SERVICES AND  
FINANCIAL PRODUCT ADVICE  
for RETAIL CLIENTS

*This Financial Services Guide was prepared and approved by Peak Investment Holdings Pty Ltd  
(AFSL 304008) and issued on 28 July 2025*

## PEAK INVESTMENT HOLDINGS PTY LTD

**ABN 17 118 685 993**

**Australian Financial Services Licence Number (AFSL) 304008**

### PEAK INVESTMENT PARTNERS PTY LTD

**ABN 12 109 434 880**

**Authorised Representative Number 277751 of Peak Investment Holdings Pty Ltd**



#### Contact details for your Adviser

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## The Purpose of this document

This Financial Services Guide (**FSG**) relates to the **Managed Discretionary Account (MDA)**, **Separately Managed Account (SMA)** and **financial product advice services** offered to **retail** clients. Generally, a retail client has a portfolio less than \$500,000, but other tests may be applied to classify a client as wholesale as prescribed by the Corporations Act 2001. This FSG is designed to assist you in deciding whether to use the financial services described in this guide. It provides you with important information outlining: who we are; how you can contact us; what services we are authorised to provide; how we are remunerated; our professional indemnity insurance and how we deal with complaints.

## Our Authorisations

Peak Investment Holdings Pty Ltd (**PIH**) is authorised to deal in and provide financial product advice to retail and wholesale clients in relation to the following financial products:

- Deposit and payment products;
- Derivatives (for hedging purposes only);
- Interests in managed investment schemes (including IDPSs);
- MDA services;
- Securities;
- Standard margin lending facilities; and
- Superannuation, including self-managed superannuation funds (SMSFs).

The MDA service provider is PIH.

The SMA service provider is Peak Investment Partners Pty Ltd (**PIP**). PIP is an authorised representative of PIH.

Where we provide you with financial product advice, this will be provided by PIP.

PIH has delegated portfolio management services to PIP.

Your Advisers are Andrew Martin and Paul Israel who are employed by PIP.

### Lack of Independence Disclosure Statement

Based on the restrictions set out in s923A of the Corporations Act, we are not permitted to use the terms independent, unbiased or impartial when providing personal advice to retail clients. The reasons for this are:

- PIP (the financial services provider) is wholly owned by PIH (the product issuer of the MDA) and advises clients on the PIH MDA service.
- PIP receives the Management Fee in its exclusive capacity as the delegate of PIH.

## About the services provided

PIH was established by a group of investment professionals who have long experience in portfolio management and equity research. Our aim is to provide clients with an outstanding level of service combined with the ability to assist the management and growth of clients' personal wealth.

### a) MDA service

A **Managed Discretionary Account (MDA)** is defined as:

A service where a client gives an AFS licensee the authority to manage investments on their behalf, according to a defined investment program, without a need to get the client's consent for each transaction.

As your account is managed on a discretionary basis this means we do not need to contact you before making a change to your investments as long as the change is within the scope of your Investment Program. Your Investment Program is based on your financial goals, risk tolerance and any specific preferences. We will exercise any rights relating to your investments on your behalf including corporate actions.

Rather than being part of a large pool of money and/or investments, your portfolio assets are owned by you and managed for you pursuant to the Investment Program included in your MDA Agreement.

You are always the beneficial owner of the investments, which are registered in your name for Australian securities or held by a custodian on your behalf for overseas investments.

### For MDA services PIH will provide you with:

- Risk analysis and portfolio planning strategies;
- Portfolio construction;
- Active investment management of the underlying securities in your portfolio;
- Complete portfolio administration service;
- Quarterly portfolio reporting; and
- Annual reporting of transactions and income for taxation purposes.

The majority of the investments within your portfolio will be made up of Australian and international equities, fixed interest deposits, floating rate income hybrid securities and exchange traded funds. PIP's investment committee manages a process that screens securities for fundamental and technical value. Securities within portfolios will be allocated according to each client's objectives, financial situation and needs including your risk profile. The Target Market Determination for these services can be found at [www.peakinvest.com.au](http://www.peakinvest.com.au).

We will only recommend our MDA service if we consider it is suitable for you. We act for you when providing this service.

#### **b) SMA service**

An **SMA Service** is a managed investment scheme and a service for making a financial investment. Each investor has a separate 'Account' to which their investments are allocated.

PIP is the Model Portfolio Manager who manages the Peak Model Portfolios on an ongoing basis. These model portfolios are managed within the Praemium platform. You will be the beneficial owner of the investments in your Account and you can view online all of the investments which are included. Your investment in the managed investment scheme is covered by the Scheme PDS.

For superannuation clients the Praemium SMA is also offered in a retail superannuation environment through the Praemium SuperSMA. Diversa Trustees Limited is the trustee of the Praemium SMA Superannuation Fund, an APRA regulated superannuation fund. Praemium SuperSMA offers a choice of Accumulation, Transition to Retirement Pension and Account Based Pension Accounts.

Praemium buy and sell investments to be included in, or removed from, your Account as the Model Portfolios change. When you invest in the SMA, you are required to appoint a Nominated Representative who is authorised to provide instructions to Praemium and to receive communications from Praemium on your behalf. Your nominated representative is your financial Adviser.

Further information about the Praemium SMA and SuperSMA features can be found on [https://www.praemium.com/au/solutions/au/managed-accounts/#separately-managed-accounts-\(sma\)](https://www.praemium.com/au/solutions/au/managed-accounts/#separately-managed-accounts-(sma))

#### **For SMA services PIP will provide you with:**

- Risk analysis
- An assessment as to whether an SMA product is appropriate for your financial circumstances, goals and objectives
- A review of the SMA model portfolios we have established for our clients to determine which of these may best suit your needs, objectives and risk profile
- Active investment management of the underlying securities in the SMA model portfolios

The majority of the investments within model portfolios will be made up of direct securities, particularly for those investing into Australian fixed interest, floating rate income hybrid securities and equities. PIP's investment committee manages a process that screens securities for fundamental and technical value.

PIP will not be providing an ongoing advisory service for the SMA investment. Should your financial circumstances or your needs and objectives change, please contact us. We can discuss whether a review of the suggested SMA model is considered appropriate and an agreed hourly cost for undertaking such a review.

We will only recommend our SMA service if we consider it is suitable for you. We act for you when providing this service.

#### **c) Financial product advice**

If you are provided with personal financial advice our recommendations will be included in a written Statement of Advice (SOA).

If you are provided with general advice or factual information about a financial product this may be verbal or written. General advice does not take into account your personal objectives, financial situations or needs. You should therefore consider the appropriateness of the advice, in light of your own personal requirements. You should obtain a copy of and consider the relevant Product Disclosure Statement (PDS) before making any investment decisions.

#### **We do not provide tax advice:**

Please also be aware these Advisers are not tax agents. Nothing in any advice provided is intended to be considered by you as tax financial advice that you should rely on to satisfy liabilities or obligations or claim entitlements that arise or could arise under taxation law. You should seek the advice of your accountant or tax adviser.

#### **How to contact us**

You can contact us to give any instructions in person, by phone or email. The contact details for our financial Advisers are on the cover page of this FSG.

## Other documents you may receive

### Managed Discretionary Account "MDA" Agreement, (also known as the MDA Contract)

Before any MDA services can be provided, you must sign an MDA Agreement with us. The MDA Agreement will include an Investment Program that complies with Division 3 of Part 7.7 and Division 2 of Part 7.7A of the Corporations Act 2001 and will explain:

- the investment strategy that we will implement on your behalf;
- the nature and scope of the discretions we are authorised or required to exercise when managing your investments under the MDA Agreement;
- information about any significant risks associated with the MDA Agreement;
- the basis on which we consider that the MDA Agreement is suitable for you; and
- that the MDA Agreement may not be suitable for you if you provide us with limited or inaccurate information about your relevant personal circumstances or if those circumstances change.

Your Adviser will be the person responsible for reviewing the suitability of the Investment Program and the MDA Agreement for you at least every 13 months. You can request changes to your Investment Program at any time by contacting us.

### Statement of Advice (SOA)

If you are a retail client receiving personal financial advice your Adviser will confirm their recommendations in writing so that you can make an informed decision about the suitability of the advice to you. Their recommendations are contained in a written SOA.

### Record of Advice (ROA)

An ROA is documentation of further verbal or written further advice provided to a retail client. A copy is available to you on request. An ROA is required where you are provided with further personal financial advice and

- (a) You were previously given an SOA setting out your relevant circumstances in relation to the advice;
- (b) Your relevant circumstances in relation to the further advice (taking into account your objectives, financial situation and needs) are not significantly different from those in the SOA; and
- (c) The basis on which the further advice is given is not significantly different from the basis on which the previous advice was given.

A change to your portfolio assets within the guidelines of an agreed MDA Investment Program is not further personal advice.

## Product Disclosure Statements

The Product Disclosure Statements, Investment Menu and Performance Updates for the Praemium SMAs can be found at <https://www.praemium.com/au/resources/forms-documents/>

The FSG for Praemium can be found at <http://www.praemium.com.au/terms>

### Fee Disclosure Statement for MDAs

You will receive a Fee Disclosure Statement (FDS) for your MDA on an annual basis. The FDS will include information about services you were entitled to receive, services we actually provided to you and fees charged for the previous 12 months, as well as services to be provided to you and estimated fees for the upcoming 12 months. The FDS will also include details of how you can renew your ongoing fee arrangement with us which you will be required to do annually.

## What information will you need to provide

For the MDA and SMA service you will need to complete an Investor Profile providing background information on yourself and your assets and investments in order for us to determine your investment needs, objectives and financial circumstances. You will also need to complete a Risk Profile to assist us with your personal risk tolerance to enable us to align your investment asset allocation and underlying securities with your individual risk profile.

We do this to ensure that the strategy we pursue on your behalf meets your relevant circumstances. Inaccurate, incomplete or out-of-date information relating to your personal circumstances could lead to a mismatch between strategy and your needs and objectives.

**For MDA services you must notify your Adviser as soon as possible if your personal circumstances change as your MDA Agreement and Investment Program may no longer be suitable to meet your relevant circumstances.**

### Risks associated with an MDA Service...

Your Adviser will explain to you any significant risks associated with investments or strategies that we recommend to you.

One of the risks of using our MDA service is that you will not know about the changes we make to your investments before they are made. However, we will only make adjustments which are consistent with our understanding of your relevant personal circumstances and the agreed Investment Program.

You should also be aware that all investments carry risk. Different strategies may carry different levels of risk, depending on the investments that make up the strategy. Investments with the highest long-term returns may also carry the highest level of short-term risk. The level of risk for each person will vary depending on a range of factors, including your age and time horizon, your return objective and risk tolerance.

The value of investments and the level of returns will vary. Future returns may differ from past returns. Returns are not guaranteed, and investors may lose some of their money.

Even a carefully planned, weighted and diversified portfolio may experience periods of negative performance. Domestic and international economic factors, government policies and legislative changes, exchange rate fluctuations, inflation rates, commodity prices, natural disasters and terrorism events are all factors that may impact portfolio performance.

The laws affecting MDA services may change in the future.

Your Adviser will also explain the relationships between these risks and the possible investment rewards that we believe you stand to gain should you choose to participate in our MDA service. If you do not understand these risks, you should ask your Adviser to explain them to you.

### Risks associated with an SMA Service...

Your Adviser will explain to you any significant risks associated with investments or strategies that we recommend to you, in particular the fact that discretionary 'trading' of Financial Products may be speculative and carries with it the risk of loss of some or all of the amount traded. Even a carefully planned, weighted and diversified portfolio may experience periods of negative performance. Domestic and international economic factors, government policies and legislative changes, exchange rate fluctuations, inflation rates, commodity prices, natural disasters and terrorism events are all factors that may impact portfolio performance.

Your Adviser will also explain the relationships between these risks and the possible investment rewards that we believe you stand to gain should you choose to participate in our SMA Service. If you do not understand these risks, you should ask your Adviser to explain them to you.

Further information on the investment, general and specific risks associated with the Praemium SMA and SuperSMA are outlined in the Praemium PDS and Investment Guides.

### Custody and administration

PIH does not provide custodial or depository services.

For the MDA service Australian securities are registered in the name of the client (except when a nominee company is used). International securities on overseas exchanges are held by the appointed sub-custodians for CMC Markets Stockbroking (BNP, Hong Kong and Shanghai Banking Corp Limited or RBC Investor Services depending on which exchange the securities are held).

PIH has outsourced portfolio reporting and recording for its MDA service to Praemium Australia Limited ABN 117 611 784 AFSL 297956 (**Praemium**). Praemium was selected because of its report generation, data feed, reconciliation and corporate action functions. Portfolio data generated by Praemium is reviewed and reconciled by the PIP administration team. The performance of Praemium in providing this service is regularly reviewed and assessed by PIH against Praemium's obligations and service standards in our outsourcing agreement with Praemium.

For the Praemium SMA service, securities are registered in the name of the custodians appointed by Praemium, HSBC Bank Australia Limited for domestic assets and J.P.Morgan for international assets, and held in direct beneficial ownership for you. If you invest in the Praemium SuperSMA your investment in the Scheme is held by the Trustee, Diversa Trustees Limited, who specialises in superannuation trustee services and is regulated by APRA. The Trustee's website [www.diversa.com.au/trustee](http://www.diversa.com.au/trustee) contains the information and documentation required to be disclosed by the Trustee.

### Referrals, commissions or associations

PIH and its related body corporates do not receive commissions (apart from commissions that are rebated in full to clients), remuneration or other gifts or benefits from the issuers of any financial products, except for those noted in the Lack of Independence Disclosure Statement on page 2.

PIP receives model portfolio fees for investment management services. There are no other associations or relationships between PIH or any related body corporate of PIH and the issuers of any financial products, except for the relationships between those related body corporates and PIH itself.

PIH intends to invest the majority of clients' funds into direct listed securities. There may be occasions when a collective vehicle is the best vehicle to gain exposure into certain specialist investment areas - for example overseas investments and alternative investments. If any fee is payable to PIH for placing your investment in such a specialist fund, we will reimburse it to you where this is permitted.

Our Advisers may receive employee incentives. These are not commission-based payments, but discretionary bonuses determined after considering numerous factors including portfolio performance, servicing of existing clients, administration efficiencies and overall contribution to the business. These incentives are paid by PIP.

Our Advisers may own shares in PIH and be entitled to receive a share of profits through dividend payments.

PIP has entered into various joint ventures with professional organisations for the referral of wholesale clients to Peak whereby revenue and administration are shared for the benefit of clients' share portfolios. Any fees associated with these arrangements are paid by PIP.

### **What happens if you have a complaint?**

PIH's internal dispute resolution procedures are designed to provide effective, fair and timely complaints management. They meet the requirements set out in ASIC Regulation Guide RG 271 (Internal dispute resolution). A copy of these procedures may be obtained by contacting PIH.

### **You may make a complaint by taking the following steps:**

If you have a complaint regarding the financial product or services you have received, please contact your Adviser. Alternately, you can contact the Compliance Officer (Stuart Dear) directly at Peak Investment Holdings Pty Limited, Level 11 56 Pitt Street Sydney NSW 2000 or at [stuartd@peakinvest.com.au](mailto:stuartd@peakinvest.com.au) or 02 8274 5870.

If, after taking the action outlined above, you are dissatisfied with the outcome, you may complain to the Australian Financial Complaints Authority (AFCA) of which PIH is a member. AFCA is an independent not-for-profit body which has been approved by the Australian Securities and Investments Commission (ASIC) to deal with complaints from consumers and small businesses in the financial system.

Please send any complaints to:

**Australian Financial Complaints Authority**  
**Address: GPO Box 3 Melbourne VIC 3001**  
**Phone: 1800 931 678**  
**Website: [www.afca.org.au](http://www.afca.org.au)**  
**Email: [info@afca.org.au](mailto:info@afca.org.au)**

ASIC also has a free call Infoline on 1300 300 630 which you may use to make a complaint and obtain information about your rights.

### **Professional indemnity insurance**

PIH has a professional indemnity insurance policy in place, which covers you and us for any errors or mistakes relating to our MDA or SMA services. The policy meets the requirements of the Corporations Act 2001 (Cth) and includes coverage for the services provided by your Adviser. This still applies after your Adviser ceases working with us, provided we notify the insurer of the claim when it arises and this is done within the relevant policy period.

### **Conflicts of interest**

PIH discloses that it or its officers, employees or its related bodies corporate may from time to time have an interest in securities, directly or indirectly, which are bought, sold or held by you or other clients. They may buy or sell securities in companies held by you or other clients. At times such transactions may not be consistent with the securities bought, sold or held by you or other clients. However, such transactions are subject to PIP's Employee Share Trading Policy.

Where potential conflicts of interest may arise between the interests of clients, PIH and related parties, we will manage the conflicts of interest and always act in your best interests.

### **Privacy Policy and Privacy Collection Statement**

In order to comply with the requirements of the Privacy Act, we are required to advise you that PIH holds personal information about you. This may include, but is not limited to, your address, contact details, tax file number and other personal information relating to your financial circumstances. The information has been and will continue to be collected by us for the primary purpose of providing you with the MDA and SMA services including:

- a. the preparation of your MDA investment program
- b. the preparation of your MDA Agreement
- c. the provision of an SMA service to you
- d. the provision of advice to you
- e. investing in securities and other investments

We are required, pursuant to the Corporations Act 2001 and certain regulations issued by the Australian Securities and Investment Commission (ASIC), to collect information about you for the purpose of providing you with the MDA and SMA services.

We will from time to time disclose information about you to Advisers of PIH and to other professionals, superannuation trustees and product issuers in connection with the purpose detailed above. We may also be required by law to disclose your personal information to government agencies, including the Australian Taxation Office, the Australian Transaction Reports and Analysis Centre (Austrac) or a court of law. We may disclose personal information to overseas recipients should your MDA portfolio include overseas investments including to CMC Markets (the sub-custodians are international banks including BNP, Hong Kong and Shanghai Banking Corp Limited and RBC Investor Services, who are located in the country of the stock exchange) and the Internal Revenue Service for US shares (United States of America).

In the event we consider it necessary to use or disclose information about you for purposes other than the primary purpose detailed above, or related purposes, we will seek your consent.

We are authorised under the Income Tax Assessment Act 1936 to collect Tax File Number (TFN) information. The use and disclosure of this information is strictly regulated by Taxation laws and the Privacy Act. It is not an offence to refuse to provide a TFN. However, if you choose not to provide your TFN or other personal information to your Adviser, your Adviser may decline to provide personal advice to you, or the advice you receive may not be appropriate to your circumstances, needs and objectives. If your Adviser leaves PIH, PIH will continue to hold your personal information in accordance with our Privacy Policy.

You are entitled to obtain access to the information which we hold about you by contacting PIH. We have developed a Privacy Policy which embodies our legal obligations in respect of your privacy. Our Privacy Policy can be obtained by contacting us directly or by visiting our website [www.peakinvest.com.au](http://www.peakinvest.com.au).

### Minimum account balance for SuperSMA accounts...

The minimum account balance in the SuperSMA is \$10,000. If your balance drops to below \$10,000 Praemium may close your account. The Federal Government's Protecting Your Super Package which came into effect on 1 July 2019 included changes to the treatment of inactive accounts. If your account has been inactive for 16 months and you have a balance less than \$6,000, it will be transferred to the ATO. Within 28 days of receiving your money, the ATO will try to transfer it to an active super fund.

If your account balance for a product offered by the superannuation entity is less than \$6,000 at the end of the entity's income year, the total combined amount of administration fees, investment fees and indirect costs charged to you is capped at 3% of the account balance.

### Fees and costs

#### CONSUMER ADVISORY WARNING

##### DID YOU KNOW?

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

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

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

**You may be able to negotiate to pay lower fees. Ask your financial Adviser.**

##### TO FIND OUT MORE

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

This document shows the fees and other costs you may be charged for using our MDA and SMA services. These may be deducted from your portfolio or from the returns on your investments. It is important to understand their impact on your investments.

We do not charge any fees for general financial product advice that we provide.

Our investment decisions may also have capital gains and income tax consequences for you, depending on your personal circumstances. Your tax adviser will be able to advise you about this.

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