

Financial Services Guide

A guide to the financial services we provide and how we will work with you to achieve your goals

About this document

At Viola Private Wealth (VPW), we want to make sure you are always informed of all the options, costs and benefits of the advice we provide to you.

Before we provide you with financial advice, you should read this Financial Services Guide (FSG).

It contains the following important information to help you decide whether to use our services:

- About us
- The financial products and services your Adviser can provide to you
- How we, your Financial Adviser and other related parties are paid
- What associations or relationships we have with others that could influence the advice provided to you
- How we collect and use your personal information
- Details of who to contact should you have a complaint

About us

Financial advisers at VPW are authorised representatives of Viola Private Wealth Pty Ltd, ABN 85 135 817 766, AFS Licence No. 336950.

AFS Licence No. 336950 authorises us to provide a range of personal financial advice and services to you. Our experts know the best way to protect and grow your wealth. This FSG is used by our Advisers to inform our retail clients of the financial services provided by us, and is designed to assist you in deciding whether to use our services. We are obliged to provide you with a minimum level of information as required under the Corporations Act 2001 (Cth) and our AFSL.

If you decide to use our services, you will receive this FSG and your Adviser's profile, which provides you with more information about your Adviser, including their contact details, experience and qualifications. You should read these two documents together.

Lack of Independence

VPW is not independent, impartial or unbiased in relation to the provision of personal advice because:

- a. In some cases, we may receive revenue such as placement fees from wholesale investment offerings. Please note, we fully disclose any benefits received to clients prior to placing investments.

VPW has approved the distribution of this FSG. Please retain this document for your reference and any future dealings with VPW.

Contact details

ABN 85 135 817 766 | AFSL No: 336950

Address
Level 18, Suite 1,
25 Bligh Street,
Sydney NSW 2000

Phone +61 2 9174 6499
Email enquiries@violapw.com.au
Web violaprivatewealth.com.au

About your Adviser

Your Adviser is authorised by VPW to provide financial product advice in relation to, and deal in, certain financial products and services. VPW will be responsible for any financial services that your Adviser is authorised to provide to you.

The Adviser profile which you will have received contains important information about your Adviser including details of their education and qualifications, what advice they can provide, what relationships and associations they maintain as well as details of how they get paid for providing you with advice.

Why choose us?

We aim to provide personalised advice solutions tailored to your needs and objectives and believe that sound advice and planning is the key to improving your financial position.

We undertake continuous professional development and training programs so that we are up to date with legislative changes to superannuation, investment, social security and tax environments.

We have access to technical, risk and investment research professionals who provide us with additional analysis on strategies and products that become available as a result of these changes.

Our Advisers will help you determine your goals and weigh up different investment options to achieve them.

Most importantly, we turn your thoughts into action. There are no secret formulas to achieving financial security.

We work with you to get the basics right and ensure you have a plan to achieve your goals over time.

We can provide advice on:

- Employee share plans and share schemes
- Tax and structuring
- Wealth creation
- Retirement planning
- Debt reduction
- Sophisticated superannuation strategies
- Estate planning
- Investment management
- Ongoing advisory services
- Investment structuring
- Asset protection

How can you give us instructions about your financial products?

To develop a successful financial strategy, including recommending suitable products and services to meet your needs, we need to consider your personal circumstances and financial needs, goals and objectives. We will ask you for information about your personal circumstances when we meet with you.

You have the right not to provide us with personal information. However, without this information, or if it is inaccurate, the advice you receive may not be appropriate for your personal circumstances. If the information is incomplete and/or inaccurate, your Adviser may provide you with a warning that the advice may not wholly represent your needs, objectives or financial situation.

It is also important that you keep us up to date by informing us of any changes in your circumstances, so we are able to determine if our advice continues to be appropriate to your circumstances. It is important that you provide us with complete and accurate information about your circumstances and you take the time to check any

We can arrange the following products and services:

- Deposit and payment products;
- Debentures, stocks and bonds issued;
- Life insurance and life risk products;
- Interests in managed investment schemes including investor directed portfolio services;
- Retirement savings accounts;
- Securities;
- Standard margin lending facilities; and
- Superannuation.

assumptions we make and the basis for our advice. If you don't, our advice may not be appropriate for your needs.

You can deal with us in person, by phone or email. You may also make an appointment to see your Adviser in person as part of a scheduled review meeting or for any other matter. Your Adviser will use the most recent contact details we have for you when initiating communication. If you have provided an email address, and unless we agree otherwise, we will generally use that medium to communicate with you.

Our initial advice will be provided to you in a financial plan, known as a Statement of Advice ('SOA'). The SOA contains a summary of your goals and the strategies and financial products we will recommend to help you achieve your goals. It also provides you with detailed information about the fees, costs and other benefits we will receive as a result of the advice we have provided. We will maintain a Record of Advice ('ROA') for any further advice and/or reviews we provide to you.

You have the right to request a copy of these documents up to seven years after the advice was provided by contacting your Adviser.

Documents you may receive

If we recommend or arrange a financial product for you, we will generally provide you with the relevant product disclosure statement (PDS) or investor directed portfolio service (IDPS) guide (as applicable). 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 your investment or insurance. You should read any warnings contained in your SOA, the PDS or IDPS guide (as the case may be) carefully before making any decision relating to our advice.

Ongoing service arrangements

You have the opportunity to enter into an annual Ongoing Service Arrangement ('OSA') with VPW, which sets out the terms of our ongoing services to you, including in relation to fees. We will invite you to renew the OSA each year with us.

Our standard terms of business can be found on the VPW website.

Your privacy and access to your information

As part of the financial planning process, we need to collect information about you and maintain a record of your personal information. We are also required under the Anti-Money Laundering and Counter-Terrorism Financing (AML-CTF) Act 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 maintain a record of your personal information. You have the right to withhold personal information, but this may compromise the effectiveness of the advice you receive. If your personal 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.

Your Adviser and VPW will take reasonable steps to protect your information from misuse, loss, and unauthorised access, modification or improper disclosure. As part of our continuing commitment to client service and maintenance of our client confidentiality, we are bound by the Australian Privacy Principles (APPs) established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012. 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 VPW may have access to this information when providing financial advice or services to 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;
- Your Adviser may, in the future, disclose information to other financial Advisers, Mortgage Brokers, Accountants and those who are authorised by VPW to review customers' needs and circumstances from time to time, including other companies within VPW;

- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist your Adviser and VPW in providing financial advice and services to you. A list of countries where these service providers are located can be accessed via the VPW Privacy Policy;

- Your information may be used to provide ongoing information about opportunities that may be useful or relevant to your financial needs through direct marketing (subject to your ability to opt-out as set out in the VPW Privacy Policy); and

- Your information may be disclosed as required or authorised by law and to anyone authorised by you.

Our Privacy Policy contains information about how to make a complaint about a breach of the Australian Privacy Principles. For a copy of VPW's Privacy Policy visit www.violaprivatewealth.com.au or you can contact us.

You can request access to the information your Adviser or VPW holds about you at any time to correct or update it as set out in our Privacy Policy. If you wish to examine your file, we ask that you make a request in writing and allow up to fourteen working days for the information to be provided. We may charge a fee to cover the cost of verifying the application and locating, retrieving and/or copying any material requested. If the information sought is extensive, we will advise you of the likely cost in advance and can help you to refine your request if required.

Another Adviser may be appointed to you if your existing Adviser leaves VPW or is unable to attend to your needs due to an extended absence from the business. In these circumstances, VPW will write to you advising you of the change. Your personal information will be passed on to the new Adviser.

How we charge fees

We are for the most part a fee-for-service firm. Our predominant source of income is the money you agree to pay us for our services. This is usually in the form of an initial advice fee and an ongoing service fee. Fees will be fully disclosed to you in your advice documents, and the terms of our ongoing services arrangements are governed by the OSA.

We will generally:

- Charge a fee directly to you based on the value of unborrowed assets on which we advise;
- Charge a fee directly to you based on the hours involved in the assignment, and the level of staff required to provide the advice;
- Receive commissions paid to us by the product issuers whose products we recommend to you; or
- Charge any other combination of the above.

A further breakdown of fees is as follows:

Initial advice fee

For our initial review and advice, we may charge a fee of between \$1,100 to \$22,000 incl GST, depending on the complexity of your situation. The Initial Advice Fee is the cost of us preparing and subsequently implementing your personalised strategy. The fee for a financial plan will vary depending on the complexity of the advice and strategy provided. The fee will be agreed upon prior to the preparation of the financial plan.

Ongoing service fee

Depending on your personal situation and the services you require, you may elect to take up our ongoing service offering. We will either:

- Charge a set fee agreed upon upfront, or;
- Charge a fee based on assets under management. Our fee scale will depend on the nature of the assets managed and the investment strategy adopted. Typically, this will range between 0% - 1.5% of funds under management. Generally, the rate will depend on the amount of your investments, as follows:

Up to \$5m (inc. GST) 1.1%
\$5m - \$20m (inc. GST) 0.88%
\$20m+ (inc. GST) 0.66%

The fees outlined above are inclusive of GST.

This fee may be subject to an annual minimum amount.

We will always agree our fees with you upfront and prior to proceeding with work. As described above, fees will be fully disclosed to you in your advice documents.

Share transactions

If we recommend you buy or sell shares, we may charge a % fee of the value of the trade when we arrange it for you (in addition to the brokerage

charged by your stockbroker).

Adhoc fees

If you do not wish to take up our ongoing service offering we can provide you with adhoc services when requested. The hourly charge-out rates for our team of professionals ranges between \$165-\$660 per hour inc of GST. Fees will include, but are not limited to, all professional time for drafting, reviewing and completing documents, correspondence, advices, conferences, reading materials, traveling (where related to the work), telephone calls, research and providing letters where requested by you. We will always agree our fees with you upfront and prior to proceeding with work. Fees will be fully disclosed to you in your advice documents that we provide you.

Other payments VPW may receive

- Placement or Distribution fees: We will disclose any remuneration we are likely to receive when presenting these investment opportunities.

Relationships and associations

It is important for you to understand the relationships that exist between us and other service providers, as they may be considered to influence our recommendations to you.

We have associations with a wide range of Financial Product issuers and Service Providers. However, we are not owned by any Financial Product issuer or Service Provider. From time to time, we may refer you to other professional service providers, and, we may refer you to related entities for certain services, when appropriate, that may encompass mortgage broking services, tax services and life insurance services.

Other interests

If we identify that you have a need for credit assistance services we can arrange those services, i.e. mortgage broking, commercial financing and leasing services, through a referral to Fisher Robertson ABN 38 628 496 864. We have a revenue sharing arrangement in place with Fisher Robertson where 25% upfront and ongoing will be shared with us

John Fisher is the principal and is authorised through Loan Market Pty Ltd trading as Loan Market ACN 105 230 019 (ACL No. 390222). If we identify that you have a need for personal insurance we can also arrange those services, i.e. life or income protection insurance, through a referral to MBS insurance.

We have a revenue sharing arrangement in place with MBS where 20% upfront and ongoing will be shared with us. MBS Insurance Co Pty Ltd is a Corporate Authorised Representative of MBS Advice Licence Pty Ltd AFSL 536983.

Whilst we may refer you to Fisher Robertson or MBS, you should understand that these other services are not provided under the VPW AFSL and VPW does not train, support or supervise the provision of these other services and has no responsibility in relation to these services.

VPW is not responsible for advice, services or information provided to you by any of these related entities. You are under no obligation to use the services of any of these related entities.

Referral Payment

If we have referred you to another professional adviser (e.g. an estate planning specialist or tax agent) we do not receive a referral fee from the referral. See above section for referrals to Fisher Robertson and/or MBS. If you have been referred to us by Equity Mates, we will share revenue with them being 15% of fees received by VPW over first 3 years.

Other disclosures

- We may recommend an Administration Platform to assist in the consolidation in reporting on your financial affairs. We may own shares in these companies, which are publicly listed, on the same terms as any other shareholder.
- Advisers may have shareholdings in Public Companies. This information is available upon request.

Memberships

- Financial Advice Association Australia (FAAA): We are a professional partner of the FAAA. When you choose a financial planner who is a member of the FAAA, you will be working with a professional who puts your interests first. FAAA members are committed to a code of ethics and professional conduct, so you can rest assured that they'll do the right thing by you.
- The Principals Community: Aimed at supporting AFSL holders grow their business whilst understanding and exceeding legal requirements, which are constantly changing aspects of our industry.
- Risk and Compliance forum: Facilitated by legal firm Holley Nethercote, this is a forum that brings together risk and compliance professionals to collaborate and learn.

Insurance

Complaint resolution

VPW has a Professional Indemnity Insurance Policy ('PI policy') in place which meets the requirements of the Corporations Act 2001 (Cth).

The PI policy covers us and our representatives for claims made against us by clients as a result of the conduct of our employees or representatives in the provision of financial services, even if that person has ceased to act or work for us.

Who can I complain to if I have a complaint about the provision of the financial services to me?

VPW is committed to providing the highest quality of financial planning and investment advisory services to its clients and, as part of that commitment, to respond to any complaints promptly, fairly and effectively. We have developed an internal complaint resolution policy and complaint handling procedures that complies with Australian Standard AS/NZS 10002:2014 Guidelines for Complaint Management in Organizations and with ASIC Regulatory Guide RG271: Internal Dispute Resolution.

The VPW Public Complaints Policy is published on the VPW website.

The policy provides details on how you may lodge a complaint with us, options available to assist you with complaints (if you need additional assistance) and VPW's key steps for dealing with complaints including assessment, investigation and complaint resolution.

We are also a member of the Australian Financial Complaints Authority (AFCA), a not-for-profit, approved external complaints resolution scheme which provides a free consumer service.

If you have any complaint about our services, the following steps should be taken:

- 1/ Contact the Adviser directly and tell them the nature of your complaint, giving them an opportunity to resolve the complaint immediately. The Adviser may directly escalate your complaint to our Chief Executive Officer.
- 2/ If your complaint has not been satisfactorily resolved within ten business days, please contact Sean Ward, Chief Executive Officer of Viola Private Wealth, on +61 2 9228 2217 or put your complaint in writing and send it to him at Viola Private Wealth, Suite 1, Level 18, 25 Bligh St, Sydney NSW 2000. He will then seek to resolve your complaint.
- 3/ If you still do not get a satisfactory outcome within 30 calendar days of the first notification of your complaint to us, you have the right to lodge a complaint with AFCA at GPO Box 3, Melbourne, Victoria, 3001. Their phone number is 1800 931 678. This service is provided to you free of charge.

The Australian Securities and Investments Commission (ASIC) also has a freecall Infoline 1300 300 630, which you may use to obtain information about your rights.

If your complaint relates to a breach of our Privacy Policy or the Australian Privacy Principles, the matter should be referred to The Privacy Officer, Viola Private Wealth, Suite 1, Level 18, 25 Bligh St, Sydney NSW 2000.

Confirmation

By signing below, you confirm that you have received a copy of our Financial Service Guide or instructions about where to find our website disclosure information.

If you instruct us to proceed to provide you with advice, you agree that you:

- authorise the use of the email address you have nominated for advice and communication purposes.
- will provide us with all information requested in order to understand your financial situation and objectives. If there is a change in your current financial position, you will promptly notify us in writing so that recommendations or investments can be reassessed. You understand that the advice we prepare will be limited by the accuracy and completeness of the information you have disclosed.
- consent to us collecting information about you from third parties including superannuation funds, product issuers and professional advisers.
- consent to receiving all disclosure documents electronically, including via hyperlink and consent to signing all documents electronically (unless you notify us that you wish to sign in a different way).

- expressly authorise us to accept instructions or directions provided by any one of the individuals named below without seeking confirmation, consent or approval from any other individual and to release all personal and financial information to either party.
- have obtained the prior consent from any third party in relation to whom you have provided us personal information (including where relevant your family members) to provide that information to us for the purpose of us providing services to you.
- understand and consent to the collection of information by us and disclosure of your information and identification to other entities within our group (if any), service providers or other parties processing information on your behalf or on our behalf (e.g., platform and product issuers and providers and credit reporting agencies) in compliance with our Privacy Policy which can be found at violaprivatewealth.com.au/privacy-policy. Our Privacy Policy sets out our contact details, the purposes of collection of personal information and to whom and where we disclose personal information. It also sets out consequences if information is not collected.

- consent to us verifying your identity electronically pursuant to our obligations under the Anti-Money Laundering and Counter Terrorism Financing Act using data bases maintained by credit reporting bodies in accordance with our Privacy Policy. You can tell us at any stage if you would prefer us to use other forms of identity verification.

You agree that:

- we are authorised to request and collect your tax file number information under the Tax Agent Services Act 2009, Taxation Administration Act 1953, Superannuation Industry (Supervision) Act 1993 and Income Tax Assessment Act 1936 and that we request and collect this information to enable us to act on your behalf in the conduct of your tax, super or personal assistance affairs.
- It is not an offence for you to decline to provide your tax file number information. However, if you do not provide us with this information, we may not be able to provide you with all of the Services under this engagement.

You give permission for your tax file number to be stored in a secure format by us in accordance with legislative requirements and give permission for your tax file number to be provided to third parties as required.

FSG

Receipt

Client Name(s):

Signature:

Date:

FSG

Receipt

Company Client:

Director(s):

Date:

Trust Client:

Trustee(s):

Date:

Charlie Viola

Executive Chair, Adviser and
Founding Partner CFP®
Viola Private Wealth

P: +61 2 8236 7798
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Professional background

Charlie provides investment management services for high-net-worth individuals, family offices, and institutional investors with \$5M-\$250M of investable assets. With over 24 years of experience, he serves as the Executive Chair, Adviser, and Founding Partner of Viola Private Wealth, overseeing approximately \$2 billion in assets.

Before establishing Viola Private Wealth, Charlie was a Partner and Managing Director at Pitcher Partners Sydney Wealth Management. During his tenure, he helped grow the firm's Assets Under Management (AUM) from \$50M to over \$3.5B, personally managing \$2B by 2022. His client-focused approach is central to his success, ensuring clients are well-informed and presented with exclusive investment opportunities.

Charlie is recognised as a leader in the wealth management industry, frequently ranked on Barron's Top 100 Australian Advisers list for his outstanding expertise and client outcomes. Under his guidance, Viola Private Wealth continues to set the standard in servicing high-net-worth individuals and families.

Industry experience

- ASX listed companies – Share-based remuneration schemes
- High-net-worth individual – Planning and investment management

Areas of expertise

- Holistic private client advisory services
- Retirement planning
- Redundancy planning and advice
- Investment management
- High-net-worth individuals
- SMSF advising and dealing

Professional qualifications and memberships

- Advanced Diploma of Financial Services
- Certified Financial Planner (CFPTM)
- Member, Financial Planning Association
- Affiliate Member, Chartered Accountants Australia and New Zealand
- Leading Professional Services Firms Program (Harvard Business School)

Awards

- Financial Standards Power 50 – Top 50 most influential advisers in Australia in 2018, 2019, 2020, 2021, 2022, and 2025
- Barron's Top Australian Financial Adviser – Ranked #1 in 2018, #4 in 2019, #15 in 2020, #10 in 2021, #4 in 2022, #5 in 2024, and #7 in 2025
- Investment Advisory of the Year finalist, 2021 – IFA Excellence Awards 2021
- Partner of the Year, 2017 – SMSF and Accounting Awards
- Partner of the Year finalist, 2017 – Australian Accounting Awards

How he is paid

Charlie is a shareholder in VPW. He is paid a salary and may receive disbursements, such as capital and profit related benefits.

Charlie Viola, ASIC AR number 231191, is an authorised representative of Viola Private Wealth Pty Ltd, ABN 85 135 817 766, AFS Licence No. 336950.

Peter Nevill

Partner, Adviser CFP®
Viola Private Wealth

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Professional background

A Partner at Viola Private Wealth, Peter Nevill is a highly accomplished Adviser, with deep expertise in constructing tailored investment strategies that align with each client's unique goals and circumstances.

His knowledge spans traditional asset classes such as listed shares, property, and fixed income, complemented by a strong emphasis on unlisted, private-market investments including private equity, credit, and infrastructure. Through harnessing private market alternative assets, Peter helps clients access differentiated opportunities that enhance portfolio diversity and create the potential for outsized, risk-adjusted returns.

Holding the Master of Financial Planning and CFP® designations, Peter is recognised for his strategic insight and bespoke approach to constructing and managing portfolios. He delivers integrated advice across superannuation, retirement planning, and tax-effective wealth structures, positioning his clients to navigate complex financial landscapes with clarity and confidence – helping clients unlock lifestyle optionality and support multi-generational wealth outcomes.

A former Australian Test cricketer and father of a young family, Peter brings a unique, grounded, client-first perspective. He works closely with high-net-worth individuals, business owners, and executives, helping them grow, preserve, and enjoy their wealth with purpose and flexibility.

Areas of expertise

- Investment portfolio management, including listed equities, managed funds, private equity, and other Wholesale private market assets
- Strategic Superannuation advice and retirement planning for high-net-worth individuals and families
- Structuring advice for asset protection and to optimise tax efficiency, including Discretionary Trusts and Corporate Beneficiaries

Professional qualifications and memberships

- Master of Financial Planning (Kaplan Professional)
- Certified Financial Planner (CFPTM)
- Member, Financial Advice Association of Australia
- Bachelor Bus. Mgt. (Comm. Law & Mktg.)
- Self-Managed Super Fund (SMSF) Association Member

How he is paid

Peter is a shareholder in VPW. He is paid a salary and may receive disbursements, such as capital and profit related benefits.

Peter Nevill, ASIC AR number 1302587, is an authorised representative of Viola Private Wealth Pty Ltd, ABN 85 135 817 766, AFS Licence No. 336950.

Alex Thompson

Provisional Financial Adviser
Viola Private Wealth

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Professional background

Alex works with high-net-worth individuals, families, and non-profit organisations, drawing on more than a decade of experience across institutional banking and wealth management. He specialises in complex financial structures and brings a disciplined, solutions-focused approach to preserving and growing wealth.

Before joining Viola Private Wealth, he was Director, Funds at ANZ's Institutional Bank, advising Australia's largest investors, including sovereign wealth funds, superannuation funds, and private capital managers, on tailored strategies across global markets. He previously held a senior role at Macquarie Group, deepening his technical expertise in capital markets and investment structuring.

Alex's institutional background allows him to offer clients a unique lens, pairing strategic insight with practical, long-term solutions.

He holds a Bachelor of Business Administration from Macquarie University, a Graduate Diploma of Financial Planning, and is an accredited derivatives adviser.

Areas of expertise

- Institutional-grade investment strategy for private clients
- Complex structuring and capital management across global markets
- Derivatives advice and risk management
- Strategic banking solutions for private capital and philanthropic entities

Professional qualifications and memberships

- Graduate Diploma of Financial Planning (Kaplan Professional)
- Accredited Derivatives Adviser (Kaplan Professional)
- Bachelor of Business Administration (Macquarie University)

How he is paid

Alex is paid a salary and may receive disbursements, such as capital and profit-related benefits.

Alex Thompson, ASIC AR number 001317512, is an authorised representative of Viola Private Wealth Pty Ltd, ABN 85 135 817 766, AFS Licence No. 336950.

Contacting us

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