



Financial Services Guide

Prepared on 4 November 2024

Contents

Why am I Receiving This Document?	2
Our Services	3
Relationships and Associations	3
Managed Discretionary Account (MDA) Service	4
MDA Contract & Investment Program	4
How Do You Know We will Manage Your Investments Appropriately?.....	5
Giving Instructions	5
Our Fees	6
Commissions	7
Consumer Advisory Warning	8
MDA Fees and Costs Summary.....	8
Example of Annual Fees and Costs for the MDA Service Offered by Us	9
Referral Fees	10
Other Benefits.....	10
Other Important Information	10
Custody of Your Investments	11
Our Professional Indemnity Insurance	11
Your Privacy.....	11
Outsourcing Arrangements.....	12
How Can You Contact Us.....	12
Making a Complaint	13

Jason Featherby (Authorised Representative 283735) & Fulford Street Pty Ltd (Authorised Representative 1311992) (ABN 16 679 388 213) are Authorised Representatives of NKH Knight Holdings (AFSL 438631) (ACN 163 152 967)

Fulford Street Pty Ltd has entered into a licensing agreement with Leeuwin Wealth Pty Ltd (ACN 679 320 720) to use Leeuwin Wealth Branding and refers to its services as the Leeuwin Wealth Service. For the avoidance of doubt, any advice, guidance, recommendations, or services offered are provided by Fulford Street Pty Ltd as an Authorised Representative of NKH Knight Holdings Pty Ltd.

This FSG has been authorised for distribution by NKH Knight Holdings Pty Ltd.

Why am I Receiving This Document?

This Financial Services Guide (FSG) is an important document, which describes our Financial Planning, Advisory and Managed Discretionary Account (MDA) service to assist you in deciding whether to use our services.

This FSG contains information about NKH Knight Holdings Pty Ltd (our AFS Licensee), Fulford Street Pty Ltd and your Financial Adviser; Jason Featherby (collectively us, we and our). It describes how we are remunerated, our professional indemnity insurance and how we handle any complaints you may have. Financial advice is provided to you by Fulford Street Pty Ltd and Jason Featherby as authorised representatives of NKH Knight Holdings Pty Ltd.

We may give you other documents when providing our services. These may include:

- A Statement of Advice (SoA)—If we provide you with advice about your personal circumstances, we will set out our advice in a Statement of Advice (or in some cases, a shorter document called a Record of Advice). This will also tell you how we will be remunerated for the advice we give you and importantly, detail all fees specifically payable by you. When we provide further advice to you, we may not give you a Statement of Advice, however we will record the advice and you can ask us for a copy of the advice by calling us.
- Product Disclosure Statement (PDS)— If we recommend that you acquire a financial product, we will also provide you with a Product Disclosure Statement containing information about the product's features and risks.

Not Independent

We are not independent, impartial, or unbiased within the meaning of the Corporations Act because we or our Australian Financial Services Licensee operate our own Managed Discretionary Account service and receive fees from it, may receive commissions for life risk insurance products or other benefits. We also maintain an approved product list (APL) and a preferred provider list (PPL), where our advice is generally restricted to recommending products that are part of our APL and PPL.

Our Services

NKH Knight Holdings Pty Ltd, holds an Australian Financial Services Licence (#438631). Fulford Street Pty Ltd and Jason Featherby are authorised representatives of NKH Knight Holdings Pty Ltd.

We provide strategic investment advice. We assist you by:

- Identifying your financial and investment objectives,
- Understanding your current financial position and personal circumstances;
- Helping you to develop investment strategies to meet your financial goals
Advising you on how to implement your investment strategies; and
- Recommending, arranging and dealing in financial products that are suitable for the agreed strategies.

We provide advice and deal in the following financial products:

- Deposit and payment products
- Government debentures, stocks and bonds
- Managed Discretionary Account (MDA) services
- Superannuation including Self-Managed Super Funds
- Securities
- Managed investments schemes
- Life risk and investment products
- Margin lending
- Retirement savings accounts

Relationships and Associations

Jason Featherby is an equity owner of Leeuwin Wealth Pty Ltd and Director of Fulford Street Pty Ltd, and receives a salary, he may also receive payment in the form of revenue share, profit and distributions from these entities. Jason does not receive volume-based incentives for providing financial services to you. Your advice document will disclose any benefits or fees received by Fulford Street Pty Ltd providing the Leeuwin Wealth Services.

Knight Group Pty Ltd, NKH Pty Ltd, NKH Knight Holdings Pty Ltd (our AFS Licensee), Simplex Self-Managed Superannuation Pty Ltd and Knight Financial Advisors Pty Ltd are related bodies corporate within the meaning of the Corporations Act, 2001. Jason Featherby is a shareholder of Knight Group Pty Ltd which owns NKH Knight Holdings Pty Ltd (the AFSL). As a shareholder of the businesses Jason may be entitled to a share of the business profits and may receive a distributions from these entities.

As part of providing our advice, we may refer you to other entities owned by Knight Group Pty Ltd (which provide Accounting, Tax and Self-Managed Super Fund services) or any of its subsidiaries.

Your advisor may discuss or provide advice on investments, which they, or the director(s) and shareholders of our businesses, may hold in their own personal portfolios

Managed Discretionary Account (MDA) Service

Fulford refers to its Managed Discretionary Account services as its '**Leeuwin Wealth Service**' due to its collaboration with Leeuwin Wealth Pty Ltd ACN 679 320 720 ('**Leeuwin Wealth**'). Any guidance, recommendations, or services offered as part of the 'Leeuwin Wealth Service' are provided by Fulford. The Leeuwin Wealth Service is an MDA Service that enables you to provide Fulford with the discretion to manage your investments in accordance with the MDA Contract and Investment Program.

Under the MDA Service, you delegate to Fulford the investment discretion over your portfolio, including the decision on rights relating to the investments, including corporate actions. In such instances, Fulford will **not** be required to communicate with you to seek your instructions.

MDA Contract & Investment Program

You will need to enter an MDA Contract before we can provide an MDA service to you. As part of our MDA service, we will also recommend a suitable Investment Program (which will comply with Div 3 of Part 7.7 and Div 2 of Part 7.7A Corporations Act 2001 (Cth)). The Investment Program will explain:

- The investment strategy we will implement on your behalf;
- The nature and scope of the discretions you will authorise and require us to exercise when managing your investments;
- Any significant risks associated with the MDA Contract;
- The basis on which we believe the MDA Contract is suitable for you; and
- That the MDA Contract 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.

We will review the suitability of the Investment Program and the MDA Contract for you at least every 13 months. You can request changes to your Investment Program at any time by contacting us.

We will exercise any rights (such as voting rights) relating to the investments in your Investment Program on your behalf.

You can establish the MDA service by signing the Authority to Proceed at the back of the SoA we provide you as well as the portfolio management agreements. You will need to provide a Power of Attorney and enter into MDA Contract with us, or IAS (see page 6), as applicable, before we can provide the service to you.

Significant risks associated with investing through the MDA Service

The significant risks associated with investing through the MDA Service are more fully described in the Investment Program; however, you should be aware of the following:

- The investment discretion involves the selection of assets exposed to the higher-risk investment sectors such as property, the share market and international investments and therefore entails exposure to capital risk.

- The Investment Program is based on your relevant personal and financial circumstances, needs and objectives and risk/return preferences. Therefore, there may be risks associated with a change to those circumstances, needs, objectives and risk/return preferences which affect the appropriateness of the Investment Program.
- Your portfolio assets will be subject to active management and therefore you will generally not be aware of the investment transactions being undertaken on your behalf until after the event and therefore such involves information risk.

The MDA service only allows us, as the investment manager, to make changes to the investments within your account. Part of the service provides for your authority to us to withdraw funds from the account, which is used to settle investments and costs where necessary. No one will have authority to transact on any of your investments held outside the account without your consent.

The main risk 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 strategy.

How Do You Know We will Manage Your Investments Appropriately?

Once in place, changes will only be made to your investments which are consistent with our understanding of your financial needs, objectives and circumstances. We will also comply at all times with the MDA Contract and the Investment Program that is agreed with you.

It is important that you immediately inform us of any significant changes to your financial needs, objectives or personal circumstances, otherwise the MDA service may not be suitable for you.

You will have access to on-line reporting for your account. This will allow you to view the transactions undertaken on your behalf and to understand their impact on your account.

Giving Instructions

Unless otherwise agreed, all instructions to us in respect of your MDA Portfolio must be provided to us in writing (which includes email) through your Financial Adviser; and

In regard to corporate actions and other rights (including voting rights), you can elect to provide written instructions to your adviser in respect of such rights. In the event your adviser doesn't receive any instructions, they can use their discretion under the MDA to take any action they deem suitable.

We are under no obligation to act in accordance with your instructions if we

reasonably consider that they are ambiguous, unclear or conflict with any regulatory requirement or local market practice. We will notify you if we decide not to act in accordance with your instructions for any reason.

We will contact you for instructions where action is required on your MDA account, which is outside our authority.

Our Fees

How we are paid	Description of fees
Your first meeting with us	This is complimentary and obligation free.
<p>Plan Preparation Fee This includes all initial meetings with you, the time we take to determine our advice and the production of the SOA.</p> <p>The fee is based on your situation, the scope and complexity of the advice provided.</p>	We charge a fee of between \$nil to \$7,700 incl. GST. We will agree the fee with you at our first meeting.
<p>Plan Implementation Fee: This is for the time we spend assisting you with implementation.</p>	<p>If you decide to proceed with our advice we may charge a fee.</p> <p>We charge a fee of between \$nil to \$9,000 excl. GST, depending on the extent of the work required.</p>
Note: You will be charged either a Plan Preparation Fee or a Plan Implementation Fee, not both	
<p>Asset Management Fees We may meet with you periodically to provide performance reports and update our advice. The updates will consider the economy and market position, the latest investment research, changes in legislation, new products available in the market.</p> <p>The level of fee will depend on the ongoing service we agree to provide to you, the complexity of your situation and your requirements.</p>	<p>We will charge either a fixed fee between \$nil up to \$1,100.00 inc. GST per month or up to 1.65% Inc. GST of your portfolio value.</p> <p>The fee method (fixed dollar amount & / or based on a percentage) will be agreed with you prior to implementation, with consideration given to total levels of funds invested and ongoing service requirements.</p> <p>We will let you know what the fee will be in the SoA and the Ongoing Fee Agreement.</p>
<p>Centrelink Nominee Service As your Centrelink Nominee we can assist with the following: claim applications, claim monitoring, income stream updating and other Centrelink information updating as required.</p>	We will charge a fixed fee of \$440 per annum (incl. GST). This will be invoiced to you annually should you elect to appoint Knight as your Centrelink Nominee.
<p>Insurance Advice Fee We may also charge you an amount of which will depend upon the type of insurance we</p>	This fee will range from \$Nil to \$5,000 depending on the level and complexity of your insurance needs.

arrange. This fee is payable in addition to the premium.		
Insurance Claims Handling Service Insurance claims handling service fees will be determined on a case-by-case basis with your fees outlined in both our Engagement Letter and our Statement of Advice	If we undertake our insurance claims handling service for you, we charge a maximum fee of 7.7% Inc. GST of the sum insured for successful lump sum insurance claims (Life / Total & Permanent Disability / Trauma), capped at \$27,500 including GST. In the event of standalone income protection claims we charge an hourly fee of \$275 Incl. GST. The minimum insurance claims handling service fee is \$5,000 including GST.	
Brokerage Brokerage fees will be charged for all share trades.	MDA Service	Non-MDA Service
	The maximum brokerage you will be charged is 1.10 % incl. GST of the total value of each trade. Of this we may be paid up to 90% of the total brokerage you are charged.	Brokerage of \$110 incl. GST or 1.10% Incl. GST of the total trade value (whichever is the greater) may be charged by the broker on each trade we execute on your behalf. We may receive up to 100% of the value of the total brokerage charged.

All fees are paid to NKH Knight Holdings Pty Ltd (the Licensee) who after deducting a fee for the provision of licensing services pay 98% of fees to Leeuwin Wealth. All fees include GST unless otherwise disclosed.

Commissions

Please note that in relation to the financial products or life insurance products we recommend, NKH Knight Holdings Pty Ltd and Fulford Street Pty Ltd are eligible to receive the following terms of payment:

Upfront % of premium (incl GST)	Trail Commission % of Premium where there is no increase in benefit of the policy (incl GST)
66%	22%

Note: There are clawback of commission provisions where policies are cancelled, dependant on age of the policy.

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 the features of an MDA service justify the fees and costs.

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) has a managed funds fee calculator to help you check out different fee options.

MDA Fees and Costs Summary

The following explanation and table show an example fees and other costs you may be charged by **other service providers** when using our MDA service. These will be deducted from your investments so it is important to understand their impact.

Type of Fee or Cost	Amount	How and When Paid	Who Are They Paid to?
Ongoing Annual Fees and Costs			
Management Costs (Fund Manager Fees)	These fees will range from 0% to 1.10% depending on the managed funds within your portfolio.	These are the fees charged by Managed Funds to cover the fees and costs of managing the investment and will be disclosed in the relevant PDS.	These fees are paid to the managed fund investment manager.
Platform Administration Fees	These fees will range from 0% to 1.10% depending on the platform.	This is the administration fee charged by the Platform provider and will be disclosed on the SOA and PDS.	These fees are paid to the administration platform provider
Transactional and operational costs			
Brokerage on Shares	\$110 incl. GST or 1.10% Inc. GST of the total trade value (whichever is the greater)	These fees are generally paid at the time of the trade. They are added to the cost of a purchase or	These fees are paid to Fulford Street & the

		deducted from the proceeds of a sale. In some cases, brokerage may be calculated and deducted after the trade has been completed.	administration platform provider
Transaction Costs on Managed Funds	All managed funds within the recommended platform attract a flat fee of between \$0 and \$25.30 per trade.	These fees are paid at the time of trade.	These fees are paid to the administration platform provider

Example of Annual Fees and Costs for the MDA Service Offered by Us

The table below illustrates how the fees and costs of our MDA service can affect your MDA portfolio over a 1 year period. You can use it to compare the service with similar investment products.

Example Portfolio Balance of \$50,000 with a \$5,000 contribution		
Fee Type	Example Cost	Explanation & Amount Charged
Establishment fee	Nil	On establishing your MDA account you will not be charged an establishment fee.
Plus Contribution Fee	Nil	You will not be charged a contribution fee.
Plus Asset Management fee	1.10%	For a portfolio balance of \$50,000 you may be charged \$550 each year for advice, management and administration of you portfolio.
Plus Management Costs (Fund Manager Fees)	0.10%	For a portfolio balance of \$50,000 that is invested in managed funds, \$50 may be deducted from the value of those investments each year.
Plus Platform Administration fee	0.25%	And, for every \$50,000 you have in your investment portfolio, the platform provider may charge you \$125 each year.
Plus Transaction costs	1.10%	Brokerage costs are estimated to be \$55* based on \$5,000 contribution.
Equals Cost of MDA service	\$780*	If you invested \$50,000 at the beginning of the year and put in an additional \$5,000 during that year, you would be charged fees of \$780.

***Additional brokerage fees and buy sell costs may be incurred based on the securities including listed shares and managed funds purchased in your MDA account as brokerage is charged on every transaction we make on your behalf.**

Referral Fees

In some situations, we may receive fees or commissions from external parties when we refer you to them. We may receive from them up to 33% incl. GST of their upfront or ongoing remuneration for referring you to them. We will disclose the referral arrangements to you whenever we refer you to an external party.

In some situations, we pay fees or commissions to external parties who have referred you to us. We may pay up to 33% incl. GST of ongoing remuneration we receive from you to the firm who referred you to us. We may also pay up to 0.33% Incl. GST of the initial investment amount from fees we receive from you to the referrer. These referral fees do not represent an additional cost to you, nor do they affect the performance of your investment or product, or the premiums you pay. We will disclose the referral arrangements to you when we provide you with a SOA. These fees are paid to the Licensee KNH Knight Holdings Pty Ltd and Leeuwin Wealth.

Other Benefits

We may also receive additional benefits from some product issuers by way of sponsorship of education seminars, conference or training days. These benefits may change from year to year. Details of any benefits received between \$100 and \$300 will be maintained on a Register which is available to you on request. Benefits over \$300 are not allowed to be accepted.

Other Important Information

- You can deal with and provide general instructions to us in writing, via phone or via email/fax. However, please note you are responsible for ensuring your instructions reach us.
- It is important that you provide us with complete and accurate information about your circumstances and you take the time to check any assumptions we make and the basis for our advice. If you don't our advice may not be appropriate for your needs.
- We may provide further advice to you, if you engage us to do so, to keep your plan up to date for changes in your circumstances, as advised by you to us, changes in the law, the economy and financial products.
- 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.

Note that we do not offer the MDA service to all clients.

Custody of Your Investments

NKH Knight Holdings Pty Ltd does not provide custodial or depository services relating to the MDA service for your portfolio assets.

The MDA Service may utilise the services of Platform Provider through which all transactions on your MDA portfolio will be made. As a result, you will also need to enter into an agreement with the Platform Provider to authorise them to act on Leeuwin Wealth instructions.

Depending on what is best for your circumstances you may hold your MDA investments in your own name or a mix of your own name and held on trust by our recommended Platform Provider — both of which are managed by us. We will provide you with the recommended Platform Providers FSG and PDS, if this service is best for you.

The recommended product provider's are responsible for holding the investments on trust for you and to carry out administrative functions which feed into our software to enable our report preparation for you. The name and contact details of your administration service provider will be detailed in your MDA contract. Your Financial Adviser can provide details of the custodian of the technology platform they have recommended. More information about the custodian can be found in the Product Disclosure Statement (or IDPS Guide) for the platform.

Our Professional Indemnity Insurance

Our AFS licensee has professional indemnity insurance in place which covers us for any errors or mistakes relating to our financial planning services. This insurance meets the requirements of Section 912B of the Corporations Act and covers the services provided by us / our advisers and our authorised representatives after they cease working with us provided we notify the insurer of the claim when it arises and this is done within the relevant policy period.

Your Privacy

We are committed to protecting your privacy. We use the information you provide to advise about and assist with your financial affairs.

If you provide personal information to any entity owned by Knight Group Pty Ltd, other entities owned by Knight Group Pty Ltd may have access to it. With your informed consent we may also disclose your information to insurers, banks, accountants, external paraplanners, lawyers, professional advisors and other third parties if we deem it necessary as part of our advice process.

We may also collect information from third parties such as banks, accountants, lawyers, other professional advisors and persons acting on your behalf, for example guardians and people holding power of attorney.

We maintain a record of your personal profile that includes details of your investment objectives, financial situation and needs. We also maintain records of any recommendations made to you. If you wish to examine your file, you should ask your adviser, and they will arrange for you to do so. We are committed to implementing and

promoting a privacy policy, which will ensure the privacy and security of your personal information. Please refer to our Privacy Policy for further information including the information we hold about you and how to make a privacy related complaint, including how we will deal with it by visiting <https://knightgroup.com.au/privacy-policy/>

We may also utilise the services of a broker, for any share transactions, and provide you with their FSG, as applicable.

Outsourcing Arrangements

NKH Knight as the AFSL, undertake due skill and care in choosing suitable service providers who are select to outsource key functions before they are appointed. This due diligence requires us to be satisfied that they have appropriate processes for complying with their regulatory obligations. Further we monitor their performance by an annual review in addition to ongoing daily monitoring in the process of carrying out business.

The MDA Service may utilise the services of an external product provider through which all transactions on your MDA portfolio will be made. As a result, you will also need to enter into an agreement with the Product Provider to authorise them to act on Fulford Street's instructions.

The MDA Service may utilise BT Panorama, HUB24, Macquarie, Insignia Financial as a the Product Provider for the administrative functions, reporting, and custodial and depository services associated with your portfolio.

These Product Providers may charge direct fees in addition to our Fees as detailed in the Fees and Cost Summary. Please refer to the relevant providers PDS which we will provide to you if we recommend these products.

How Can You Contact Us

Fulford Street Pty Ltd

ABN: 16 679 388 213
Corporate Authorised Representative No. 1311992
Business address: Suite 1, 1292 Hay Street, West Perth WA 6005
Adviser: Jason Featherby
Authorised Representative No: 283735
Ph: 0422 669 651
Email: jfeatherby@leeuwinwealth.com.au

Our AFS licensee — NKH Knight Holdings Pty Ltd

ABN: 30 163 152 967
AFS Licence No: 438631
Business address: Unit 19, Level 2, 100 Railway Road, Subiaco WA 6008
Ph: 08 9367 8133
Mail: PO Box 8281 SUBIACO WA 6008
Email: compliance@knightgroup.com.au

Making a Complaint

We endeavour to provide you with the best advice and service at all times. If you are not satisfied with our services then we encourage you to contact us.

Please call us or put your complaint in writing to our office. We will acknowledge receipt of your complaint immediately and attempt to resolve it within 30 days. Alternatively, contact our AFS Licensee directly on Ph: 08 9367 8133 or Email: compliance@knightgroup.com.au.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA) who provide a fair and independent financial services compliant resolution that is free to consumers.

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001