



# Financial Services Guide

Version 9.4 18/08/2025

# THIS FSG IS COMPRISED OF 2 PARTS

Distribution of this FSG has been approved by Akambo Pty Ltd

## Part 1:

Provides information about Akambo Pty Ltd trading as Akambo Private Wealth and the services that we provide.

### Lack of Independence Disclosure

Akambo Pty Ltd does not refer to ourselves or our advice as 'independent', 'unbiased' or 'impartial' for the purpose of section 923A of the Corporations Act, for the following reasons:

- Akambo Pty Ltd and/or its authorised representatives may receive commissions in relation to the sale of life risk insurance products.
- Akambo Pty Ltd's authorised representatives can only recommend financial products that are approved by Akambo Pty Ltd and included on the 'Approved Product List'.
- Akambo Pty Ltd is the investment manager (also referred to as Investment Sub-Adviser, Model Manager or Portfolio Manager) of:
  - Akambo Managed Discretionary Account (MDA) Service;
  - Mason Stevens Managed Portfolios;
  - HUB24 Managed Portfolio Service;
  - Macquarie Separately Managed Account; and
  - NetWealth Managed Account Service;and receives investment manager/portfolio management fees.
- Akambo Pty Ltd is the investment manager of the Akambo International Equities Fund and Akambo Future Leaders Fund – Class A and Class B, and charges management fees and maybe performance fees.

## Part 2:

'Adviser Profile' provides information about the representative who will provide the services to you, 'your financial adviser' and how they are remunerated.

## PART 1

You have the right to ask us about our charges, the type of advice we will provide you, and what you can do if you have a complaint about our services.

This Financial Services Guide ('FSG') is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with a financial service. The matters covered by the FSG include, who we are, how we can be contacted, what services we are authorised to provide to you, how we (and any other relevant parties) are remunerated, details of any potential conflicts of interest, and details of our internal and external dispute resolution procedures, along with how you can access them.

It is intended that this FSG should assist you in determining whether to use any of the services described in this document.

## Documents you may receive

You should also be aware that you are entitled to receive a Statement of Advice (SOA) when we first provide you with personal advice, (advice that takes into account your objectives, financial situation and needs).

The SOA will contain the advice, the basis on which it is given and information about fees, commissions and associations which may have influenced the provision of the advice.

If our representative provides further advice to you and your personal circumstances have not significantly changed, and that further advice is related to the advice we provided to you in a previous SOA and we do not give that further advice to you in writing you may request a copy of the record of that further advice at any time up to 7 years from the date our representative gave the further advice to you.

You can request the record of the advice by contacting the representative or us in writing or by telephone or by email.

In the event we make a recommendation to acquire a particular financial product (other than securities), we must also provide you with a Product Disclosure Statement containing information about the particular product, which will enable you to make an informed decision in relation to the acquisition of that product.

## Professional Indemnity Insurance

Akambo Pty Ltd holds Professional Indemnity Insurance ('PII') that meets the compensation requirements of the Corporations Act. The PII also provides cover for a period of time in relation to the conduct of past representatives/employees who may no longer work for Akambo Pty Ltd. If you have any questions about our compensation arrangements, please ask your representative.

## BEFORE YOU RECEIVE OUR ADVICE

### Who will be providing the financial service to me?

Akambo Pty Ltd, Australian Financial Services Licence Number: 322056, ABN: 16 123 078 900 will at all times be responsible for the advice you receive.

Akambo Pty Ltd is a wholly owned subsidiary of Janus Financial Pty Ltd. Janus Financial Pty Ltd also owns First Financial Pty Ltd, Accordius Pty Ltd, Whittle & Skok Financial Services Pty Ltd, Pharus Wealth Advisory Pty Ltd, and YX Ball Financial Pty Ltd.

Akambo Pty Ltd receives a portfolio management fee in respect of investment management services provided to First Financial Pty Ltd, Whittle & Skok Financial Services Pty Ltd, Pharus Wealth Advisory Pty Ltd, and YX Ball Financial Pty Ltd.

Akambo Pty Ltd trades as Akambo Financial Group and Akambo Private Wealth.

<b>Location &amp; Postal Address:</b>	Level 9, 90 Collins Street Melbourne, VIC 3000 PO Box 24014, Melbourne, VIC 3001
<b>Tel.</b>	03-9602-3233
<b>Fax</b>	03-9602-5009
<b>Email</b>	<a href="mailto:contact@akamboFG.com">contact@akamboFG.com</a>
<b>Website</b>	<a href="http://www.akamboFG.com">www.akamboFG.com</a>

## What kind of financial services is Akambo Pty Ltd authorised to provide me and what kinds of products do those services relate to?

Akambo Pty Ltd can deal or advise on the following products and services to wholesale and retail clients:

Deposit and payment products	Derivatives
Government debentures, stock or bonds	Life insurance and life risk products
Managed investments	Retirement income streams, including pensions and annuities
Securities	Standard Margin Lending
Financial Planning	Strategic asset allocation & investment
Estate Planning	Personal & Business insurance needs
Portfolio advice & administration	Structured Products
Superannuation	Self managed Super Funds (SMSF) & borrowing within your SMSF
Managed Discretionary Account service	Separately Managed Account
Aged Care	Centrelink and other government benefits

Individual advisers within our network may not be qualified to provide advice in all of the services and products below. Their individual adviser profiles will note any limitations to the advice they are qualified to provide.

Akambo maintains an approved product list that contains super & investment products, Australian and international fund managers and insurance providers. Akambo periodically reviews these products to ensure that they remain competitive and appropriate to address client needs and objectives. Generally, we recommend products that are on the approved products list, however, if appropriate for your needs we may recommend other products, subject to Akambo's approval process.

A copy of the approved products list can be supplied upon request.

# PRIVATE CLIENT SERVICE

Akambo's Private Client Service offers clients innovative and personal solutions via high quality investment products.

## Our service includes:

- Assessment of current situation
- Implementation of agreed strategies
- Ongoing evaluation & advice
- Clear & concise Statement of Advice
- Pro-active asset monitoring & Review
- Active participation in Corporate Actions

Our Ongoing Fee Arrangement is based upon mutual obligation and transparency. It is our goal to build a partnership with clients and to implement a plan to ensure their lifestyle objectives are achieved.

### Who do you act for when you provide financial service for me?

You, the client. Akambo Pty Ltd, the Licensee, is responsible for the financial services provided to you by your financial adviser.

### Relationships and associations

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

#### Akambo Pty Ltd's relationships with other companies

In addition to our relationship with Janus Financial Pty Ltd, First Financial Pty Ltd, Accordius Pty Ltd, Whittle & Skok Financial Services Pty Ltd, Pharus Wealth Advisory Pty Ltd, and YX Ball Financial Pty Ltd, Akambo Pty Ltd has the following relationships and associations.

**Portfolio Management Fee (Akambo):** This is the fee payable for the management of your investments invested in Akambo Managed Discretionary Account service, Mason Stevens Managed Portfolios, HUB24 Managed Portfolio Service, Macquarie Separately Managed Account, and NetWealth Managed Account Service. The Portfolio Management Fee you pay is up to 1.65% or \$1,650.00 per \$100,000 (including GST) of your investment amount.

**Investment Management Fee (Accordius):** This is the fee payable to Accordius Pty Ltd for the investment management of Accordius Australian Shares (Large Cap), Australian Shares (Small Cap), International Shares and Fixed Income model portfolios via Hub24. The Investment Management Fee you pay is up to 0.95% or \$950.00 per \$100,000 (including GST) of your investment amount.

**Administration Fee:** Akambo Pty Ltd provides administration services to Mason Stevens in respect to any MDA Investments. In return for those service, Akambo Pty Ltd receives remuneration of 0.132% or \$132.00 per \$100,000 (including GST) of your investment amount to cover operational costs relating to the establishment, ongoing administration and compliance support services of your account with Mason Stevens. This amount is paid from the administration fee you paid to Mason Stevens and is not an additional cost to you.

**Asset Consulting Services Fee:** Akambo Pty Ltd is entitled to receive 0.15% or \$150.00 per \$100,000 (including GST) of your investment amount in the Akambo Direct Bond Managed Portfolio for the asset consulting services provided to Mason Stevens. This is not an additional cost to you.

**Management Fee:** Akambo Pty Ltd may also receive remuneration of up to 0.44% or \$440.00 per \$100,000 (including GST) of your investment amount as a cost recovery relating to the establishment and ongoing management of your investments in Akambo International Equities Fund. This amount is paid from the management fee you paid to Equity Trustees and is not an additional cost to you.

Full details of these fees will be disclosed to you when we provide you with an SOA.

### **Our referral arrangements**

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 our remuneration to them for referring you to us. 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 an SOA.

We may refer you to Akambo Lending Solutions for your credit needs. Akambo Pty Ltd does not receive or pay any referral fees or commissions, as a result of the referral, however may receive a distribution from Akambo Lending Solutions as a shareholder, in the event that you have successfully settled your credit/loan via Akambo Lending Solutions.

We may refer you to Akambo Legal Solutions for your legal needs. If you decide to engage Akambo Legal Solutions, Akambo Pty Ltd will receive 10% or \$100.00 per \$1,000 (including GST) of the fees you pay to Akambo Legal Solutions as a referral payment.

We may refer you to Akambo Insurance Solutions for your insurance needs. Akambo Pty Ltd does not receive or pay any referral fees or commissions, as a result of the referral. However, if you decide to engage Akambo Insurance Solutions, Akambo Pty Ltd may receive a partnership distribution from Akambo Insurance Solutions.

None of the above payments are an additional cost to you.

## **WHEN YOU RECEIVE OUR ADVICE**

### **Will you provide me advice, which is suitable to my needs and financial circumstances?**

Yes, but to do so we need to find out your individual objectives, financial situation and needs before we recommend any financial products or services to you.

You have the right not to divulge this information to us, if you do not wish to do so.

In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings in the SOA carefully.

### **What should I know about the risks of the financial products you recommend to me?**

We will explain to you any significant risks of financial products and strategies which we recommend to you. If we do not do so, you should ask us to explain those risks to you.

### **What information do you maintain in my file and can I examine my file?**

We maintain a record of your personal profile, which includes details of your objectives, financial situation and needs. We also maintain records of any recommendations made to you.

We are committed to implementing and promoting a privacy policy which will ensure the privacy and security of your personal information. Our privacy policy is available on our website [www.akambofg.com](http://www.akambofg.com) for your information.

If you wish to examine your file, we ask that you make a request in writing and allow up to fourteen (14) working days for the information to be forwarded.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au)

## Transaction services

If you do not require personal advice, we can also implement transactions and apply for limited types of financial products, where we take your instructions for the transaction to be completed. If you wish to proceed without our personal advice, we will ask you to confirm your instructions, which we will document in writing. You can ask us for a copy of this documentation at any time.

## Managed Discretionary Account service

We use an independent MDA service provider. We offer limited types of Managed Discretionary Account services (MDA services) within approved investment platforms. Through these services, you allow us to manage your investments for you, using our discretion and without obtaining your instructions before each transaction we undertake on your behalf. The MDA service only allows us, or the investment manager, to make changes to the investments within your account.

Please note that we do not hold our own MDA licence, and the MDA service provider takes instructions from us and actions these on your account.

### MDA Service Agreement & Investment Program

We will provide you with an SOA where we recommend you enter an MDA service. The SOA will explain why we believe the service is appropriate for you. It will also set out the terms and conditions of the MDA service and the Investment Program including:

- statements about the nature and scope of the discretions we will be authorised and required to exercise under the MDA contract
- any investment strategy that is to be applied in exercising those discretions
- information about any significant risks associated with the MDA contract
- the basis on which we consider the MDA contract to be suitable for you, and
- warnings that the MDA contract may not be suitable to you if you have provided us with limited or inaccurate information. It will also specify that the MDA service may cease to be suitable for you if your relevant personal circumstances change.

### What are the risks associated with using the MDA service?

By authorising us to make changes to your investments, you cannot claim we were not acting on your behalf if we acted within the authority given. Therefore, our acts bind you. It is important you understand what we are authorised to do and that you carefully read and understand the activities that you are authorising us to do on your behalf.

### How can you instruct us to exercise rights relating to financial products in your portfolio?

Generally, the financial products that we invest in on your behalf do not have any additional rights or entitlements attached to them. However, if there are, we will let you know. You can then instruct us how you wish us to proceed.

## Do you have to enter into a contract for us to provide MDA services?

Yes. This MDA contract will set out the terms and conditions of the authority and also the investment program, which sets out how your money will be invested. We will agree and prepare the investment program for you based on your relevant personal circumstances, your financial objectives and your needs and review the program every 12 months.

## Do we provide custodial or depository services for your portfolio?

We do not provide custodial or depository services. This means your investments will be held by the custodian nominated for the relevant financial product. This financial services guide complies with the ASIC Corporations (Managed Discretionary Account Services) Instrument 2016/968.

## WHAT DO OUR SERVICES COST?

Akambo Pty Ltd is remunerated by the fees you pay and/or insurance commissions received from product issuers. The fees charged by our advice and services may be based on a combination of:

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

Our agreed advice and service fees may include charges for:

- initial advice;
- implementation;
- ongoing advice; and
- management of your investments

Please note that for services in relation to insurance, commissions may be paid by the product provider as follows:

- initial commission – a percentage of the value of your insurance premiums paid as a once-off.
- ongoing commission – a percentage of the value of your insurance premiums, usually calculated at the end of each month in which you hold the products.

All fees and commissions are paid to Akambo Pty Ltd as the licensee.

Please refer to Part 2 of the Financial Services Guide for an overview of our service fees and commissions.

All fees will be clearly stated and agreed with you in the SOA.

## IF YOU HAVE ANY COMPLAINTS

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

Akambo Pty Ltd is a member of the Australian Financial Complaints Authority (AFCA). If you have any complaint about the service provided to you, you should take the following steps:

1. Contact us and tell us about your complaint.
2. If your complaint is not satisfactorily resolved within 3 days, please contact the Compliance Manager of Akambo on 03 9602 3233 or put your complaint in writing and send it to PO Box 24014, Melbourne, VIC 3001. We will seek to resolve your complaint quickly and fairly.
3. If the complaint cannot be satisfied to your satisfaction within 30 days of its receipt, you have the right to complain to the Australian Financial Complaints Authority (AFCA). This service is provided to you free of charge. They can be contacted on 1800 931 678.

The Australian Securities and Investments Commission (ASIC) also have an Infoline, which you may use to make a complaint and obtain information about your rights. The Infoline is 1300 300 630.

## THIS FSG IS COMPRISED OF 2 PARTS

Distribution of this FSG has been approved by Akambo Pty Ltd

### Part 1:

Provides information about Akambo Pty Ltd trading as Akambo Private Wealth and the services that we provide.

### Part 2:

'Adviser Profile' provides information about the representative who will provide the services to you, 'your financial adviser' and how they are remunerated.

## PART 2

### Who is your Financial Adviser?

Your financial adviser is **Ben Seeger** (Authorised Representative No: **001243815**), an employee and equity holder of **HTA Wealth Pty Ltd** (Corporate Authorised Representative No: **001282113**) of Akambo Pty Ltd trading as Akambo Private Wealth.

### Your adviser's contact details:

**Address:** Level 4, 141 Osborne Street, South Yarra VIC 3121  
**Phone:** 03 9810 3666  
**Email:** bseeger@hta.com.au

### What Financial Services can your Financial Adviser provide?

Ben is authorised by Akambo Pty Ltd to provide advisory and dealing services in the products as detailed in Part 1 of the Financial Services Guide.

### What qualifications and experience does your Financial Adviser have?

As an Akambo Pty Ltd Authorised Representative, Ben Seeger started his career in accounting back in 2006 in the areas of interest in Taxation and Business Services, Superannuation, becoming a Partner of HTA in 2016. During this time, he was studying financial planning so that later he could become authorised to provide financial planning advice.

In 2016 he set up HTA Wealth and become the authorised financial advisors. A financial planning business where he provides holistic strategic financial planning advice.

Seeing the client needs to received sound debt advice, he set up HTA Finance and acts as the authorised mortgage broker.

As a director of the HTA group he oversees his team in Taxation, Business Services, Financial Planning and Debt. He loves working with his clients to progress their financial position. Ben is a CPA and holds a Bachelor of Business, Diploma of Financial Planning and a Diploma of Finance and Mortgage Broking.

Akambo Financial Advisers have many years of extensive experience in assisting clients achieve their financial goals. Akambo Private Wealth's financial advisers focus on assisting their clients to build wealth during their working life then specialise in managing it effectively throughout their retirement. They can provide advice on appropriate

investment types and structures, risk management and insurance needs, debt reduction strategies, taxation and estate planning.

Akambo Private Wealth concentrates on creating, protecting and enhancing the wealth of their clients by providing them with a personalised and superior advisory service. So, if you are looking for specialists in the field of Financial Planning, our advisers would be more than happy to discuss your future requirements.

### What do your services cost?

HTA Wealth Pty Ltd is remunerated by fees paid by you and/or commissions received from product issuers. All fees and commissions are paid to Akambo Pty Ltd t/a Akambo Private Wealth who then passes 100% of the fees and commissions to HTA Wealth Pty Ltd. Ben is an employee and equity holder of HTA Wealth Pty Ltd and receives remuneration from director fees, salary or business distributions.

### Initial Advice Fees

We will discuss your individual needs and objectives and agree our fees with you. The actual fees will depend on factors such as the complexity of your circumstances, goals and the scope of advice.

The following is a guide only:

Type of Fee	Fee Amount
Initial Advice Fee	Between \$500 and \$25,000
Review Advice Fee	Between \$500 and \$5,000

### Adviser Service Fee

Akambo Private Wealth may charge a fee, agreed with your adviser, for the provision of services that may include an annual review and/or a portfolio review. This fee will be either a set amount based on the time involved and complexity in reviewing your portfolio, or a percentage fee of between 0% and 1.5% per annum (excluding GST) based on the amount of funds under our advice.

For example:

With an initial investment of \$100,000 - we may charge	\$1,500pa
If your account balance was \$120,000 in the second (and subsequent) years – we may charge	\$1,800pa

### Portfolio Management Fee

Akambo Private Wealth may charge a Portfolio Management Fee between 0% and 1.5% per annum (excluding GST), agreed with your adviser, and calculated on your monthly account balance.

For example:

With an initial investment of \$100,000 - we may charge	\$1,500pa
If your account balance was \$120,000 in the second (and subsequent) years – we may charge	\$1,800pa

## Commissions on Shares & Derivatives Transactions

Depending on your arrangement with your adviser, commission may be paid by you on share and derivative transactions. The commission will range between 0 and 2%.

For example:

If you bought or sold a listed equity or derivative for \$100,000 - we may charge	\$2,000pa
---	-----------

## Commissions from Issuers of Financial Products

Akambo Private Wealth may receive commissions from life insurance companies when a life insurance product is recommended to you. These commissions can vary depending on the product issuer and type of product.

On all commission arrangements where the commission in the first year is greater than that payable in later years, the maximum upfront (year 1) commission is 66% and the maximum ongoing (years 2+) commission is 22% (inclusive of GST). Where upfront and ongoing commissions are the same, there is no legislated maximum however product providers generally pay up to 33%.

For example:

If your first year's premium was \$500 and the initial commission was 66%, Akambo Pty Ltd will receive	\$330 in the first year
If your premium for the second and subsequent years was \$500 and the ongoing commission was 22%, Akambo Pty Ltd will receive	\$110 per annum

For insurance products purchased prior to 1 January 2018, we may continue to be paid commissions in the same manner as what would have previously been advised to you at the time of obtaining the product(s).

These commissions are paid by the insurance company and are not an additional cost to you.

All fees will be clearly stated and agreed with you in the Statement of Advice.