

Financial Services Guide

HARLEN GROUP

9 DECEMBER 2025 – V6

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Who are we and how can you contact us?

Licensee

Harlen Financial Pty Ltd

ABN: 97 654 116 506

AFSL: 536933

(Harlen Financial)

Corporate Authorised Representative (CAR)

Harlen Advisory Pty Ltd as The Trustee for Harlen Advisory Trust (trading as Harlen).

ACN: 650 406 858

ABN: 38 823 952 430

CAR Number: 1296125

(Harlen Advisory, we, us, our)

Address: Level 11, 456 Lonsdale Street

Melbourne VIC 3000

Phone: 1300 200 101

Email: contact@harlen.au

Website: www.harlen.au

Harlen Financial and Harlen Advisory are collectively referred to as "**Harlen Group**".

Harlen Financial has authorised the distribution of this Financial Services Guide (**FSG**).

Lack of Independence: Harlen Group may receive commissions from life risk insurance product providers and other parties held by our clients. As such, we are not independent, impartial, or unbiased.

What is this document about?

This FSG consists of two parts, which should be read together.

Part One will help you decide whether to use the financial services we offer. It contains information about:

- the services we are authorised to provide to you;
- how we are remunerated for our services and the cost to you;
- disclosure documents that you will receive;
- any arrangements or conflicts of interest which may influence our advice to you;
- how we handle your personal information; and
- our internal and external dispute resolution processes;

Part Two contains information about the financial advisers who are authorised to provide financial advice on behalf of Harlen Advisory, including:

- your financial adviser's qualifications, and professional memberships; and
- the services your financial adviser may provide to you.

Part One

Who is responsible for the financial services we provide?

Harlen Financial, as the holder of the AFSL, is responsible for the financial services we provide to you. Harlen Financial has authorised Harlen Advisory and its employees to deliver the financial services outlined in this FSG. Any financial services offered will be provided by a representative of Harlen Financial. We do not act as a representative of any other licensee in relation to the services we provide to you.

What financial services do we provide?

Harlen Advisory offers a range of professional services to help our clients build a legacy for their families, including:

- Strategic financial planning advice;
- Wealth accumulation;
- Income & asset protection;
- Tax strategies;
- Superannuation including self-managed super funds;
- Pre and post-retirement;
- Redundancy planning;
- Business succession planning;
- Aged care advice;
- Estate planning;
- Social security benefits;
- Debt management;
- Cash flow advice; and
- Life and disability insurance advice.

Our point of difference is providing an integrated delivery of these services by an experienced team of professionals working together.

We are authorised to provide advice and dealing in the following financial products:

- Basic deposit products;
- Non-basic deposit products;
- Life products – investment life insurance products;
- Life products – life risk insurance products;
- Managed investment schemes, including investor directed portfolio services;
- Superannuation products;
- Retirement savings accounts;
- Government debentures, stocks, or bonds;
- Securities;
- Standard margin lending facilities; and
- Managed Discretionary Account services (**MDAs**).

Taxation and accounting services

Harlen Advisory in its capacity as a Registered Tax Agent and Chartered Accounting firm may offer you taxation, business advice and accounting services. These are not financial services that are covered by this FSG (**Non-financial Services**). Harlen Advisory is solely responsible for the delivery of any Non-financial Services.

Any Non-financial Services offered by Harlen Advisory will be detailed in an Engagement Letter and may be subject to different arrangements than those outlined in this FSG.

Financial product advice will be provided in the form of a Statement of Advice (**SoA**) or a Record of Advice.

How do we deliver our services?

We recognise that the objectives and personal circumstances of each client are different. Where we provide personal advice, we will listen to you to understand your objectives and circumstances. We will also ask questions and utilise our professional experience to make sure we provide advice that is in your best interests.

By law, you are entitled to receive a SoA on the first occasion that we provide you with personal advice.

The SoA will contain:

- the specific advice;
- the basis of the specific advice;
- information about fees and commissions;
- any conflicts of interests, associations or relationships we have that may influence the advice we provide to you; and
- any other relevant matters.

If we provide further advice to you after we have issued the initial SoA, and your circumstances have not significantly changed, we will provide you with a Record of Advice.

We will retain copies of each SoA and Record of Advice on your file for at least seven (7) years. You may request a copy of these documents within that period by contacting your financial adviser.

Other documents you may receive

Product Disclosure Statement

If your adviser recommends or refers you a particular financial product such as administration platforms, managed funds and personal risk insurance products, you will be provided with the Product Disclosure Statement prepared by the product issuer. This contains information to help you understand the key features, benefits and risks of the product being recommended and details of other fees and charges that may apply. This document will be provided to assist you in making an informed decision about that product. If you would like further clarification, your adviser will discuss this with you.

Engagement Letter

An Engagement Letter will be issued for all upfront and any ongoing services and fee arrangements, which is renewed on an annual basis. In circumstances where we are engaged to provide specific advice, we will propose a new engagement letter focused on achieving that specific objective.

Our service offerings

You will have a choice to select either the Comprehensive Advice or Limited Scope Advice services as outlined below. These offerings include different levels of service and applicable fees.

Please note that the process and fees outlined below are indicative only. We will provide a tailored proposal including a scope and fee estimate specific to your requirements prior to the provision of our services.

1. Comprehensive Advice Service

| Stage | Activities and Deliverables | Timeframe and Fees |
|----------------------|--|--|
| Initial Consultation | <p>We will have an initial consultation to get a brief understanding of you and your situation.</p> <p>We will outline what to expect in the advice process and the relationship with us including what we can and cannot do for you.</p> <p>We will know after this stage if we are the right fit for each other, and that you see the value of the investment in our services.</p> | If an initial appointment is required, we may charge up to \$550 (inclusive of GST) for the first appointment. Your adviser may choose to waive this fee depending on your engagement of services with us thereafter. |
| Discovery | <p>Financial Fact Find</p> <p>We seek to gather important details of your financial position from you or other parties that you authorise us to contact (e.g., your superannuation fund, other professionals etc).</p> <p>Discovery Meeting/s</p> <p>This is where we learn about you, your unique situation & your main reasons for seeking financial advice.</p> <p>We have an in-depth conversation that draws out your goals, dreams, values, concerns, and aspirations.</p> <p>We want to know what drives you and what your ideal life looks like.</p> | <p>This stage lasts 2-4 weeks and involves one (1) meeting pending timely access to information.</p> <p>Our investment in this stage is covered by our Strategy and Advice fees where you proceed with an engagement.</p> |
| Strategy | <p>Advice Identification</p> <p>We analyse the information from the discovery stage to identify the areas of advice that may be beneficial to you.</p> <p>Strategy Formulation</p> | <p>This stage typically lasts 4-6 weeks and involves 1-2 meetings.</p> <p>Fees for this stage typically range from \$3,300 to \$6,600</p> |

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| | <p>We explore your goals, workshop different scenarios & trade-offs, and conduct high-level modelling of advice strategies.</p> <p>In collaboration with you, these strategies are distilled into the few that are relevant to your situation.</p> <p>Strategy Paper and Presentation (Optional) We prepare and present a document that sets out in general terms, the strategies that may be applicable to your circumstances so that you help us understand if they will meet your objectives.</p> <p>The Strategy Paper is not advice, and you should not act in reliance on the information in this document to make financial decisions.</p> | <p>(inclusive of GST) depending on the scope and complexity.</p> <p>Fees charged to you for this stage are applied to the total fees payable at the Advice stage where you proceed within 3 months of the delivery of the Strategy Paper.</p> |
| Advice | <p>Advice Documentation We analyse and model the relevant strategies in detail and give our recommendations.</p> <p>This is delivered in a comprehensive but clear financial plan (Statement of Advice) that acts as the playbook for reaching your goals. It is designed to be a highly valuable reference for you to refer to, containing personalised projections, details of the strategies recommended actions and educational material.</p> <p>Presentation We will deliver our advice to you in an educational and collaborative presentation. The aim is to ensure that you comprehend your plan and are confident in accepting the recommendations provided.</p> | <p>This stage typically lasts 4-6 weeks and involves one (1) meeting.</p> <p>Fees for this stage typically range from \$5,500 to \$16,500 (inclusive of GST) depending on the scope and complexity (less eligible fees paid at the Strategy Stage if applicable).</p> |
| Implementation | <p>Upon your acceptance of the advice, we set about attending to various administration matters to give effect to the advice and put the plan into action.</p> <p>We will assist to open accounts, complete paperwork, meet with other service professionals and follow-up where required to make sure what needs to happen, happens.</p> <p>We aim to simplify and make things smooth and easy for you where possible.</p> | <p>This phase typically lasts 1-2 months.</p> <p>Fees and timing are dependent on the investment accounts, insurance policies and structures that are required to be established or transferred.</p> <p>Excluding the establishment of investment structures, fees for this stage typically range between \$1,650 and \$3,300 (inclusive of GST).</p> |

| | | |
|----------------|--|---|
| <p>Ongoing</p> | <p>Wealth Management Program</p> <p>Making change, creating new habits, knowing what to do and staying the course isn't easy – that's why we insist on an ongoing engagement through an ongoing program of wealth management.</p> <p>We monitor your situation to ensure that it is going according to plan and that you are on your way to achieving your goals.</p> <p>Through one or more progress meetings during the year, we discuss with you your progress against the plan in detail. As necessary, we adjust and optimise your plan as your life changes.</p> <p>Our services as part of the program will cover activities related to ensuring that you follow the financial plan agreed in the Advice stage. This includes:</p> <ul style="list-style-type: none"> • updating our original advice when your circumstances change; • managing your investment portfolio and insurance policies; • access to your advisor/s for general advice and support as required (phone / email / meeting); • scheduled progress meeting/s throughout the year to plan and stay on track, address risks and identify opportunities; • financial administration support (investments, insurance, etc); and • assess the impact of changes to your life, legislation, the economy and investment markets on your situation as they arise. | <p>This stage typically involves 2 meetings delivered over the course of a financial year.</p> <p>Our Ongoing Fees are based on both the complexity of the work involved on a year-to-year basis, but generally range between \$5,500 - \$30,000 inclusive of GST per annum.</p> <p>The fees for this stage are agreed with you annually in an Annual Advice Engagement.</p> |
|----------------|--|---|

2. Limited Scope Advice Service

Depending on the scope of our advice, the Advice Process may be limited or differ from the Comprehensive Advice Service outlined above.

By law, we are obligated to act in your best interests. This means that we need to:

- Be confident we have identified and understand the reasons you are seeking financial advice; and
- Are comfortable that we can provide advice that is appropriate considering any limitations to the scope.

We may decline to provide you with advice and refer you elsewhere if we cannot act in your best interests when scoping our advice.

The scope of the advice we provide to you will be agreed upon with you in an Engagement Letter prior to the provision of the advice.

You should be aware that by limiting the scope of our advice, we may not be able to address issues to your benefit that advice provided with a more comprehensive scope may have.

Life Insurance (Only) Advice

We will charge a fee for service where our advice is limited to life insurance only. We will quote the fee applicable to your situation and require your acceptance before we commence work.

Depending on the service option you choose, the complexity of advice required and whether implementation is required, the fee generally falls between \$1,100 and \$4,400 inclusive of GST, but will be priced according to your specific circumstances.

How are we paid for our services?

Fees for service

Your adviser will discuss and agree with you on the services to be provided and any associated fees. These will be detailed in an Engagement Letter before the delivery of the services.

We charge a dollar fee based on the agreed scope and estimated complexity. This fee may be fixed or quoted as a range depending on the type of work required and will be subject to the terms and conditions accompanying the Engagement Letter.

We receive fees in the following ways:

- as a fee for advice that will be deducted from your investment as a one-off payment or in instalments (we will obtain your consent to deduct these fees);
- by direct invoice from us for initial and ongoing advice;
- via commissions we may receive from a product provider when you commence an insurance contract; or
- a combination of the above.

Other payments we may receive

We will provide you with details of all fees, commissions, or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts.

We receive commissions from external mortgage brokers and finance providers. The commissions received may be in the form of an upfront commission on the settlement of a loan and an ongoing commission for the term of the loan between \$1,000 to \$4,000.

Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions, or other benefits we receive in relation to any other financial service we provide you.

Non-monetary benefits

From time to time, Harlen Advisory and its advisers may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g., training or sponsorship to attend conferences).

We maintain a register detailing any benefit we receive which is valued between \$100 and \$300 and other benefits that relate to information technology software or support provided by a product issuer or that relate to education and training purposes. A copy of the register is available on request. We will not accept any benefit valued over \$300.

Adviser Remuneration

Your adviser is an employee and/or an equity holder of Harlen Group. Accordingly, their remuneration is by way of a wage, distribution of profits of the business or a combination of both. Their remuneration may also be linked to their performance which is based on several key performance indicators across the business.

Commissions

In agreement with you, we may receive initial and ongoing commissions from the insurance provider.

These commissions are paid to us by the product provider and are included in what you pay for the product. The commissions vary and are based on the policy cost, which is the sum of the premiums you pay and may include other fees related to the product.

The maximum commission Harlen Advisory may receive is set out below:

| Date new product is issued | Initial commission (% of annual policy cost or increase excl. GST) | Ongoing commission per annum (% of annual policy cost or increase excl. GST) |
|--|---|---|
| 1 January 2018 – 31 December 2018 | 0-80% | 20% |
| 1 January 2019 – 31 December 2019 | 0-70% | 20% |
| From 1 January 2020 | 0-60% | 20% |

a) *Initial Commission*

The initial commission is paid in the first year and we may rebate the initial commission to you. Life insurance commissions are subject to a clawback period of two years where, if the policy is cancelled in that time, some or all the commission must be paid back to the product provider. Therefore, the initial commission is rebated to you after the second anniversary of the policy.

The amount rebated is capped at the value of the fees paid by you for life insurance advice.

b) *Ongoing Commission*

Ongoing commissions are payments paid by product providers to us in the years after the first year of your insurance policy. You'll find details of how your insurance policy cost is calculated in the relevant PDS that we provide you.

Ongoing commissions which are payable to us throughout the life of your insurance policy are subject to change. We do not rebate ongoing commissions to you.

Information we need from you and how we protect your privacy

We are required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (**AML/CTF Act**) and its corresponding rules and regulations, to implement certain client identification processes prior to providing you with our services.

We may be required to obtain information about you at the time of providing financial services to you and from time to time in order to meet our legal obligations. We have certain reporting obligations pursuant to the AML/CTF Act, and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

Protecting your privacy is important to us and central to our commitment to meeting the highest level of professional standards. We will handle your personal information per our Privacy Policy, which outlines how the information we collect from you is used, stored and disclosed.

The information you provide to us will primarily be used for providing our services to you and for complying with certain laws and regulations. We have systems and processes in place which safeguard against the unauthorised use or disclosure of your personal information.

We will from time to time disclose information about you to other professionals, insurance providers, superannuation trustees and product issuers in connection with the purposes detailed above. In the event we consider it necessary to use or disclose information about you for purposes other than those detailed above or related purposes, we will seek your consent.

Your adviser will maintain a record of your personal profile including details of your objectives, financial situation and needs. They also maintain records of any recommendations made to you. Should you wish to examine your file please ask your adviser and they will make all necessary arrangements to provide you with relevant information.

[Our Privacy Policy is available on request and on our website.](#)

Associations and relationships which could influence our advice

From time to time, we may establish relationships with other professionals and product providers to effectively deliver our services to you or to connect you with other parties to help you obtain the services you require. These relationships may give rise to an actual or potential conflict of interest.

In those circumstances, we will clearly disclose any relationships which may be deemed to influence our advice to you including any payments that are or could be made in connection with that relationship.

We do not pay any commissions to referrers.

Compensation Arrangements

We have professional indemnity insurance in place for Harlen Group that complies with section 912B of the Corporations Act and ASIC Regulatory Guide 126.

How can you make a complaint?

If you have any complaints about our services, please follow the steps outlined below.

1. Please let your financial adviser know so we can act on it immediately.
2. If your adviser has not satisfactorily resolved your complaint, please contact our Dispute Resolution Team on:

Phone: 1300 200 101

Email: contact@harlen.au

Post: Advice Dispute Resolution Team

Harlen

GPO Box 2221

Melbourne VIC 3001

We will review your concerns and provide a full written response within thirty (30) days of receipt of your complaint unless the matter is complex or circumstances beyond our control delay the management of your complaint. If this occurs, we will notify you of the reason for the delay and provide you with the option to escalate the matter to AFCA if you are dissatisfied.

If you disagree with our final response to your complaint, you may also escalate your concerns to AFCA.

AFCA can be contacted at the details below:

Phone: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org.au

Post: The Manager

Australian Financial Complaints Authority Limited

GPO Box 3

Melbourne VIC 3001

Part Two

Who are your advisers and what can they advise on?

Tom Napier

Qualifications

- Graduate Diploma of Financial Planning from Kaplan Professional in 2013;
- Bachelor of Business (Accounting) from the Australian Catholic University in 2009;
- Self Managed Superannuation Fund Adviser (Personal Advice) from Mentor Education in 2016;
- Margin Lending Adviser (Personal Advice) from Mentor Education in September 2016; and
- FASEA Financial Adviser Exam in May 2021.

Tom is a Certified Financial Planner (**CFP**) as a member of the Financial Planning Association of Australia (FPA).

Services and Products

Tom is authorised to advise on the following products and services:

- Deposit Products;
- Government Debentures, Stocks or Bonds;
- Life Products;
- Managed Investment Schemes;
- Retirement Savings Account Products;
- Securities;
- MDAs;
- Superannuation; and
- Margin Lending.

Kynan West

Qualifications

- Master of Professional Accounting from RMIT University in 2008;
- Chartered Accountants Program from Chartered Accountants Australia and New Zealand in 2012;
- Diploma of Financial Planning from RMIT University in 2015;
- FASEA Financial Adviser Exam in September 2019;
- Ethics and Professionalism in Financial Advice from Kaplan Professional in 2021;
- Client Engagement Skills from Kaplan Professional in 2025;
- FASEA Financial Adviser Exam in September 2021.

Kynan is a Chartered Accountant (CA) and a member of Chartered Accountants Australia and New Zealand (CAANZ) and a Registered Tax Agent with the Tax Practitioners Board since 2017.

Services and Products

Kynan is authorised to advise on the following products and services:

- Deposit Products;
- Government Debentures, Stocks or Bonds;
- Life Products;
- MDAs;
- Managed Investment Schemes;

- Retirement Savings Account Products;
- Securities;
- Superannuation; and
- Margin Lending.

Campbell King

Qualifications

- Bachelor of Business (Entrepreneurship) from RMIT University in 2006;
- Graduate Diploma of Chartered Accounting from Chartered Accountants Australia and New Zealand in 2011;
- Diploma of Financial Planning from RMIT University in 2016;
- Certificate IV in Finance and Mortgage Broking from Kaplan Professional in 2021; and
- FASEA Financial Adviser Exam in September 2019.

Campbell is a Chartered Accountant (CA) and CA Financial Planning Specialist as a member of Chartered Accountants Australia and New Zealand (CAANZ).

Services and Products

Campbell is authorised to advise on the following products and services:

- Deposit Products;
- Government Debentures, Stocks or Bonds;
- Life Products;
- MDAs;
- Managed Investment Schemes;
- Retirement Savings Account Products;
- Securities;
- Superannuation; and
- Margin Lending.