



STRONGHOLD  
ADVICE



# FINANCIAL SERVICES GUIDE VERSION 2.2 | 15 MAY 2026

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Stronghold Advice Pty Ltd is authorised to provide financial services on behalf of SmartMove Advice Pty Ltd the holder of Australian Financial Services Licence Number 550455

## How can we help you?

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Note: This Financial Services Guide (FSG) should be considered as Part One of the Combined FSG. A separate Adviser Profile (representing Part 2) will be provided as soon as possible or at your initial meeting to introduce your Adviser.

**Part 1:** This Financial Services Guide (FSG) is an important document that is designed to tell you about the following:

- Not Independent
- Who are we?
- What is Personal Financial Advice?
- Product Disclosure Statements
- Information we need from You
- How are we Paid?
- How we Pay our Representatives
- What to do if you have a complaint about our services
- Professional Indemnity Insurance

**Part 2:** Adviser Profile (delivered when an adviser is appointed):

- Who is my Adviser?

## Not Independent

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Bear in mind, SMA will typically receive commissions from insurance companies, when an insurance policy that your Adviser has established or taken over (ie "under advice"). This means we cannot claim to be independent. SMA is privately owned, with its own Approved Product List (APL) and is not beholden to owners or shareholders to direct clients through particular products, nor does SMA receive referral fees or marketing fees.

## Who are we?

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SmartMove Advice Pty Ltd, from here on referred to as "SMA" is a private wealth investment and Financial Advisory firm. Our Advisers' record of achievement and reliability is based on providing some of the highest quality investment and financial advice in Australia. We offer extensive skills which mirror the different needs of clients, with great emphasis placed on research to support the advice and the products provided.

SMA is the holder of Australian Financial Services Licence number 550455. Under this licence SMA can authorise advisers and Advisory firms to operate financial services businesses. SMA can authorise individuals and businesses that it views as meeting certain strict educational, experience and competency requirements as described under law, to advise and deal in the following instruments under its licence:

- Life Insurance Products (including Life, TPD, Income Protection & Trauma)
- Managed Investment Schemes (including managed funds, IDPS, syndicates & unit trusts)
- Retirement Savings Accounts
- Securities (including equity, debt & hybrid)
- Superannuation (including self-managed superannuation, retail, corporate & industry)
- Risk insurance products

## What is Personal Financial Advice?

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If we provide you with personal financial advice, then you will initially receive a Statement of Advice ("SoA") when or as soon as practical after the advice is given. This SoA will set out the advice/recommendations, the basis on which the advice was given and any remuneration or other benefits that we, including our authorised representatives and associates, may receive. We will also include details of any matter that might 'reasonably be expected' to be capable of influencing us in providing this advice.

If you maintain an advice relationship with us, then generally we will provide an SoA for further advice situations where there have been significant changes to either your personal circumstances or the basis of the advice since your last SoA was provided. In other circumstances, however, we are still required to keep a Record of Advice ("RoA") and may communicate this to you. You have the right to request a copy of your SoA or RoA at any time.

## Product Disclosure Statements

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When advice is given, we will also give you, where appropriate, a Product Disclosure Statement (PDS) issued by the product provider containing information you would reasonably require, to help make an informed decision about whether to acquire the financial product. The PDS will disclose details of any fees and charges payable for that product (as does the SoA).

## Information We Need from You

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Depending on the type of service being sought, we may ask you to provide certain personal information to your Adviser, either in writing or verbally. This may involve a quite detailed process of qualitative and quantitative data collection. Please ensure that your Adviser becomes aware of any changes that may be relevant when advice is given in the future.

### What Information Do We Retain About Clients

We maintain a record of your personal profile which may contain details of your objectives, financial situation and needs. We maintain records of any recommendations made to you, together with summaries of meetings and transactions. All these records are our property and must be retained for production to the regulatory authorities upon their request. If you wish to examine our file, you should ask us, and we will make arrangements for you to do so.

### What Are the Possible Consequences of Not Providing This Information

You are of course at liberty to decline to provide some or all of this information, but if you do not provide it, any recommendations we make may not be appropriate to your needs and objectives. In certain cases, your failure to provide information may place us in a position where we cannot provide any advice or any financial services to you.

### General Advice Warning

When we provide General Advice (whether or not we have a record of your personal details), our advice will not consider your personal financial objectives, needs or circumstances and may therefore not be appropriate for you. As we indicated above, in such circumstances you must determine if our advice is appropriate for you.

All information is kept strictly confidential, and you can obtain a copy of our Privacy Policy from your Adviser.

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act (2006) to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passports and driver's license. We will also retain copies of this information. We assure you that this information will be held securely.

## How Are We Paid?

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SMA receives Licensee Fees, deducted from the Advice Fees paid by clients.

SMA and your Financial Advisors are remunerated through a combination of fees charged to you and commissions that product providers pay. To assist you in making an informed decision, SMA and your Financial Advisor will discuss with you and agree on any fees payable before providing a service. The Corporations Act requires us to fully disclose all fees and charges, so if you are in doubt, please ask us to explain.

The level will vary with the financial product being traded, the frequency of your trading activity, the type and level of service and the size of the transaction. Fees and commissions are subject to negotiation prior to us providing you with a financial service.

Once disclosed and agreed, these fees will be charged and/or commissions will be earned at the time your transaction is executed or the service is provided.

The Advice Fees you pay to SMA may comprise one or more of the following:

- Up to 3.99% Initial Advice & Implementation Fee (Capped at \$10,000 plus GST); and
- Up to 1.99% Ongoing Advice Fee (Capped at \$3,300 plus GST); or
- A fixed dollar amount; and/or
- An hourly rate, which may include Centrelink Liaison, meeting with accountants, etc.
- A Statement of Advice Fee for the preparation of a Statement of Advice and / or
- An Implementation Fee for the implementation of financial advice and products and / or
- An Adviser Service Fee when your adviser provides you with advice and service. These fees are payable by you and may be paid either directly from you or from your financial product/s.
- SmartMove may charge you or your investment account direct service fees of:
  - An initial advice fee, payable by you following provision of the advice.
  - This will vary according to the work required and generally will range between \$1,100 and \$12,100 (including GST). This typically includes implementation fees.
  - Should a fee higher than this be required you will be advised prior to the provision advice.
  - An Ongoing fee from the investment agreed at the time of presentation will vary according to the work required, and generally will range between \$1,650pa and \$6,600 pa. Should a fee higher than this be required you will be advised at the time of presentation.
  - A self-managed superannuation fund establishment fee, if applicable, payable by you before establishment of the fund: \$2,640 to \$8,800 (including GST), depending on complexity.
  - An ongoing self-managed superannuation fund advice and administration fee, payable by you by equal monthly instalments from the fund so long as you remain a client of SmartMove: \$2,200 to \$11,000 (including GST), depending on complexity.

We will disclose the amount of each fee to you when we recommend that you invest in a product or on each anniversary of your investment, as appropriate.

GST-inclusive sums are subject to adjustment in case of a change in the rate of GST.

### Commissions Received: Insurances

SMA will receive commissions from insurance companies that you purchase insurance from, as follows:

- New Policies: Up to 66% of initial premiums
- New Policies: Up to 22% of annual renewal premiums

At times we will take over as the Adviser on existing insurance policies, and we will be bound by the initial contract terms as to the ongoing commission amounts. Typically, these can range from 11% up to 33% of annual renewal premiums.

The expected dollar amount of each commission will be disclosed when the amount of proposed or renewed insurances are determined. SMA typically receives these commissions to support insurance

advice (as opposed to charging a direct fee), however at times we may rebate commissions in favour of a direct advice fee for insurance.

## How We Pay Our Representatives

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Representatives of SMA (the Licensee) are remunerated by way of salary and bonuses. To access a potential bonus, the representative must reach a number of key monthly criteria, incorporating Compliance, Training, Performance, and Discretionary components.

## What to do if you have a complaint about our services

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We are committed to providing quality service and advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms. If you have any complaint about the service provided to you, you should take the following steps:

Contact your Financial Adviser and tell your Adviser about your complaint. Majority of complaints can be resolved this way.

If you do not have an Adviser, or your complaint is not acknowledged within 7 business days, please contact the Complaints Manager at our licensee, SmartMove Advice Pty Ltd on 0430 063 344.

You can also put your complaint in writing and send it to SmartMove Advice Pty Ltd at:

- Attention: Director/Responsible Manager
- SmartMove Advice Pty Ltd
- 10-12/107 Currumburra Road, Ashmore, QLD, 4214

At SMA we take our responsibilities very seriously and are committed to always providing the best customer service to our clients. We will try and resolve your complaint/s quickly and fairly. You should receive a written acknowledgement of your complaint within 5 business days after it is received.

If your complaint is not resolved in a satisfactory manner, within further 45 days, you can raise your concerns with the Australian Financial Complaints Authority (AFCA) on 1300 931 678. SmartMove Advice Pty Ltd is a member of this complaint's resolution service. The Australian Securities & Investments Commission (ASIC) has a free call Infoline 1300 300 630 which you may use to make a complaint and obtain information about your rights.

## Professional Indemnity Insurance

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SMA confirms that it has arrangements in place to ensure it continues to maintain Professional Indemnity insurance in accordance with s.912B of the Corporations Act 2001 (as amended). Our Professional Indemnity insurance, subject to its terms and conditions, provides indemnity for SMA and its authorised representatives / representatives / employees in respect of its authorisations and obligations under its Australian Financial Services Licence (AFSL). The insurance will continue to provide such coverage for any authorised representative / representative / employee who has ceased, for work done whilst engaged with it.