

FINANCIAL SERVICES GUIDE

Version 7

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The financial services explained in this Financial Services Guide (FSG) are provided by:

Intelligent Planning

Head office: Suite 1211, 1 Queens Road

Melbourne VIC 3004

www.intelligentplanning.com.au

The Financial Services Guide for Intelligent Planning has two parts:

- The “Licensee Profile”; and
- The ‘Authorised Representative Profile’.

Both parts should be read in conjunction so that you have a full understanding of the services being offered.



Llenpart Financial is a Corporate Authorised Representative ASIC AR 403219

Intelligent Planning is the trading name of

Dirigere Advisory Pty Limited

ABN 57 640 403 836

Australian Financial Services Licence (AFSL) number 524371



INTELLIGENT PLANNING
Advice you trust

FINANCIAL SERVICES GUIDE

Part One – Licensee Profile

Purpose of this Financial Services Guide – Why it's important to you.

This Financial Services Guide ("FSG") contains important information for you about:

- Intelligent Planning, your financial adviser and the services we offer you
- How you can contact Intelligent Planning and your financial adviser
- How Intelligent Planning and your financial adviser are paid
- Any potential conflict of interest we may have in the provision of services to you
- Our complaints handling procedures and how you can access them.

You should read this FSG and your financial adviser's 'Authorised Representative Profile', which sets out in detail the terms upon which Intelligent Planning and your financial adviser will provide financial services to you. Intelligent Planning has authorised the distribution of this FSG by your financial adviser.

Not Independent

According to the Corporations Act, there are specific criteria by which an adviser is allowed to call themselves either "independent", "unbiased" or "impartial".

As Intelligent Planning elects to accept commissions from life insurance companies as part of its remuneration, Intelligent Planning cannot claim that it is independent.

Please be aware though, that Intelligent Planning:

- Does NOT accept payments in the form of a bonus for a volume of business placed with a financial institution:
- Does NOT have ANY restriction in relation to financial products, any recommendation is given on the determination of an investment committee that operates with a strict selection criteria: and
- Does NOT allow for any conflict of interest due to connection with an issuer of financial products that could reasonably be expected to influence the adviser in carrying on the business or providing the service.

Who is Intelligent Planning?

Intelligent Planning is the trading name of the Australian Financial Services Licensee Dirigere Advisory Pty Limited. Dirigere Advisory Pty Ltd is an Australian-owned company that was established specifically to operate an Australian Financial Services Licence for the purpose of providing financial advice.

Dirigere Advisory Pty Limited T/A Intelligent Planning holds an Australian Financial Services Licence (number 524371) issued under the Corporations Act 2001 (Cth) ("Corporations Act"). Financial advisers are authorised representatives of the licensee under the Corporations Act.

Intelligent Planning provides financial planning services through its financial advisers and their financial planning practices. This is done by working with client objectives and goals first and foremost, by providing quality advice and solutions that ensure a professional and ethical service experience.

Your financial adviser may be an employee of a financial planning practice, which may also be a corporate authorised representative of the licensee. These relationships will be explained to you in more detail in the Authorised Representative Profile part of this FSG. When authorised financial services are provided to you by Intelligent Planning financial advisers, they are provided to you on behalf of Intelligent Planning.

Financial services and products provided by Intelligent Planning - what financial services can your adviser provide?

Intelligent Planning authorises representatives to provide financial services by providing advice about and arranging for a person to deal in:

- Deposit and payment products limited to:
 - Basic deposit products
 - Debentures, stocks or bonds issued or proposed to be issued by a government
- Life products including:
 - Investment life insurance products
 - Life risk insurance products
- Interests in managed investment schemes including:
 - Investor directed portfolio services
 - MDA services
- Retirement savings accounts products
- Securities
- Superannuation

These services may be provided to retail and wholesale clients.

As an authorised representative of Intelligent Planning, your financial adviser may only be authorised to provide some of these services to you. The Authorised Representative Profile part of this FSG (Part 2) outlines the financial services that your financial adviser is authorised to provide on behalf of Intelligent Planning.

You should read the Authorised Representative Profile carefully and if you have any questions you should discuss them with your financial adviser in the first instance, or with Intelligent Planning.

What services and products are not provided by or on behalf of Intelligent Planning?

Your adviser is only authorised to provide the services outlined in the Authorised Representative Profile in their capacity as an authorised representative of Intelligent Planning and is **not** authorised to provide any other services on behalf of Intelligent Planning as authorised representative or as an agent or in any other capacity (i.e., as employee or contractor). Examples of services that are **not** authorised include:

- Products that are not on Intelligent Planning's Approved Product List
- Accounting services
- Legal advice
- Taxation advice
- Mortgage origination services
- General insurance services
- Direct property services
- Foreign exchange advice
- Advice on collectables, including art.

If your financial adviser or their associates provide any of these services to you, it is important for you to understand that these services are not provided on behalf of Intelligent Planning in any capacity and Intelligent Planning is not responsible for any of them.

Providing financial services to you

In providing financial services to you, your financial adviser may give you personal financial advice. This personal advice will be provided to you in writing in a document called a 'Statement of Advice' (SoA). Its purpose is to place you in a position to make informed decisions about your financial future. The SoA will explain:

- Your current financial situation, personal circumstances, needs and objectives
- The basis for your financial adviser's recommendations and suggested strategy
- The process used to reach these recommendations and strategy
- How these recommendations and strategy meet your needs and objectives
- Any risks or consequences of accepting the advice that you should know about
- All relevant fees, commissions and other benefits payable as a result of the advice
- Any associations, relationships and conflicts of interest that may impact on the advice given
- Other relevant information.

If your financial adviser recommends that you invest in a specific financial product, they will give you a Product Disclosure Statement or a similar disclosure document such as a prospectus or Investment Memorandum (these documents are referred to in this document as a PDS). These documents provide important information to help you make an informed decision about whether to invest in a particular product.

It is important for you to understand the information in these documents, so you should carefully read the SoA and PDSs provided to you before making any decision relating to recommended strategies or financial products. If you are unsure about any of the information in the SoA or the PDSs, you should ask your financial adviser to explain it to you.

Where further advice is provided to you in situations where there has not been a significant change in your circumstances, the further advice may be recorded in a Record of Advice (RoA) which is kept on file for seven years. If you wish, you may request a copy of your RoA from your financial adviser by phone, email or post.

If you do not want holistic financial advice, but rather require more specific advice, your financial adviser will tailor the SoA accordingly. Your financial adviser can also provide you with 'no advice' services which we refer to as 'execution only services'. You can provide these instructions orally or in writing; however, if you do not obtain personal advice, you face the risk that the financial products you select will not be appropriate to your needs and objectives.

Why do you need to provide us with information?

We have an obligation under the Corporations Act to seek information from you for the purposes of providing personal financial advice. It is up to you to specify how you wish to provide us with this information and instruct us accordingly. Information and instructions can be provided to us in writing by telephone, post or email.

It is in your interests to provide us with all relevant information about your personal and financial circumstances to assist us to assess your situation and be able to make suitable recommendations.

How we protect your privacy is outlined in our Privacy Policy. This is referred to later in this FSG.

Remuneration received by Intelligent Planning and your financial adviser for financial services provided to you

Intelligent Planning allows its financial advisers flexibility to determine with their clients how they are remunerated for services provided. In this regard you may agree to pay your financial adviser a fee for service; or you may agree to commission being paid to your financial adviser by the platform or product provider; or you may agree to a combination of both.

1. Fee for service.

Your financial adviser may charge you fees for services based on an hourly rate, a fixed dollar amount, the value of funds invested or a combination of these methods. The payment method and frequency can be agreed between you and your financial adviser.

2. Other forms of Remuneration.

On 1 July 2013 new 'Future of Financial Advice' legislation (FOFA) came into effect, which prohibits Intelligent Planning and its authorised representatives from accepting 'conflicted remuneration', subject to certain exceptions.

Under FOFA, 'conflicted remuneration' is any benefit, monetary or non-monetary, that could reasonably be expected to influence the choice of financial product recommended or the financial product advice. This includes commissions, bonuses and rebates, and most volume-based benefits, but there are some exceptions, such as remuneration for retail life insurance products.

Upfront remuneration may be paid to Intelligent Planning by the issuer of the relevant financial product that has been recommended by your financial adviser. The payment may be paid by the product provider and deducted from the initial amount you have invested or based on the insurance premium you have paid. The actual amount of upfront remuneration will vary depending on the product and may be agreed with your financial adviser.

Upfront remuneration can be calculated based on a percentage of the value of the initial investment in an investment product and might vary between 0% to 2.2%, and for insurance products it can vary from 0% to 66% of the first year's premium. For example, if you invested \$100,000 in an investment product and the adviser elects to charge a fee of 2%, the upfront remuneration in that instance would be \$2,000. If you pay an annual premium of \$1,000 for an insurance product, the upfront remuneration can vary from \$0 to \$660.

Ongoing remuneration may also be paid to Intelligent Planning via the product provider for the period that you hold the financial product. Ongoing remuneration rates commonly vary between 0 and 2.2% per annum of total funds invested in an investment product, and for insurance products between 0 and 22% of the annual premium.

3. Other fees

Referral fees and rebates may also be paid to your financial adviser or their Corporate Authorised Representative. If any are relevant to your financial adviser, then details will be provided in the Authorised Representative Profile part of this FSG and specifically outlined in your SoA.

4. Alternative forms of remuneration

Your financial adviser may receive alternative forms of remuneration from time to time. Non-monetary benefits worth more than \$300 are considered 'conflicted remuneration' under FOFA unless they are covered by an exception (e.g. for training and education).

Receipts of non-monetary benefits worth between \$100 to \$300 will be recorded by Intelligent Planning in a register at least each quarter. Alternative remuneration registers are maintained by fund managers, IDPS (platform) providers, financial advisers and licensees. Intelligent Planning's register is available to you for inspection at Intelligent Planning's offices within 7 days of your request.

5. Where are details about remuneration disclosed?

If you receive personal advice from your financial adviser, they will tell you in the SoA about any remuneration and any other benefits that Intelligent Planning, the employer financial planning practice or the financial adviser may receive from the issuer of a financial product and, where possible, in actual dollar amounts. Guidelines are in the Authorised Representative Profile part of this FSG.

6. How is remuneration administered?

If you receive an invoice for financial planning services, this will be issued by your financial adviser or their employer financial planning practice and payable as directed.

All advice fees paid to the licensee are paid in full to your financial adviser, subject to the terms of any agreement between your financial adviser or their employer and Intelligent Planning.

Relevant associations and relationships of your financial adviser and Intelligent Planning

Your financial adviser will usually be the principal or an employee of a financial planning practice or partnership that is authorised to provide financial services on behalf of Intelligent Planning. In most cases that employer practice or partnership will be unrelated to Intelligent Planning; however, in some cases the practice may be a shareholder of Intelligent Planning in which case they are an associate of and may potentially share in any profits of Intelligent Planning.

Intelligent Planning has relationships with different organisations that help Intelligent Planning and our advisers in different ways. This support may include providing technical support, or subsidising training events and conferences by way of sponsorship. These sponsors may change from time to time.

Some Intelligent Planning financial advisers may have referral arrangements with other professionals. In some circumstances referral fees may also be paid. Where such arrangements exist, information detailing such arrangements will be included in the Authorised Representative Profile; where details relate directly to the advice you are given you will be provided with more specific details in your SoA.

How do we protect your privacy?

The privacy of your personal information is important to us. We have systems and processes in place to protect your privacy.

We need to collect personal and financial information to administer client relationships and provide you with appropriate products and services. For example, we may need to provide information to fund managers, platform operators and insurance providers for the purpose of giving effect to your financial plans.

We also need to collect copies of identification material to meet our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. Unless you tell us you do not want us to send you information on products and services, we may use your personal details to send you information on products and services.

We will not sell your information to third parties. You can access the information that we hold about you on request. For detailed information on how we handle your personal information and to whom this information will be provided, please read our Privacy Policy by requesting a copy from your financial adviser.

What if you have a complaint?

Even with the best of intentions there is the possibility of disagreement or dispute with you about our services. If you have any complaint about the services provided to you, we want you to tell us as soon as you can and we will endeavour to resolve it as quickly as possible. If at any time you have any complaint about the services provided to you, you should take the following steps:

1. Please first contact your financial adviser and discuss your concern. Hopefully, your financial adviser will be able to rectify the problem.
2. If for any reason your concern is not resolved to your satisfaction within five business days, you should write a letter setting out the problem to us at the following address:

The Compliance Manager
Intelligent Planning
Suite 1211, 1 Queens Road
Melbourne VIC 3458
Phone: 1300 955 869
Email: info@intelligentplanning.com.au

3. Intelligent Planning will investigate and seek to resolve your complaint within 30 days from when we receive the notification.

4. If, after 30 days, we have been unable to resolve your complaint to your satisfaction, you may address your complaint to the Australian Financial Complaints Authority at the following address:

Australian Financial Complaints Authority
GPO Box 3
Melbourne Vic 3001
Ph: 1800 931 678
Email: info@afca.org.au

Professional Indemnity Insurance

The Corporations Act requires Australian Financial Services Licensees to have adequate arrangements in place to compensate retail clients in the case of certain loss caused by Intelligent Planning or an Intelligent Planning authorised representative.

Intelligent Planning maintains professional indemnity insurance that complies with these Corporations Act requirements, including section 912B. The insurance also covers claims in relation to the conduct of representatives and employees who are no longer authorised or working for Intelligent Planning (but who did at the time of the relevant conduct).

Financial Services Industry Code of Ethics

The Corporations Amendment (Professional Standards of Financial Advisers) Act 2017 established the requirement for a Code of Ethics to be created to oversee the ethical standards of licensed financial advisers in Australia.

The Code of Ethics commenced on 1 January 2020, with all Financial Advisers required to adhere to the Code from that day onwards.

At Intelligent Planning we take these standards very seriously and ensure that all our Advisers (also known as “relevant providers”), adhere to all standards within the Code.

Our Values:

All Intelligent Planning Advisers must always act to realise and promote the values of:

Trustworthiness Competence Honesty
Fairness Diligence

All Intelligent Planning Advisers also act within a framework of twelve standards that underpin all aspects of our behaviour and are demonstrated in our advice to you:

Ethical Behaviour Client Care
Quality Process Professional Commitments

If you would like further information on any aspect of the Code of Ethics, please ask your Financial Adviser or contact us.



FINANCIAL SERVICES GUIDE

Part Two – Authorised Representative Profile

Version 1 – 22/10/2025

The Financial Services Guide for Intelligent Planning has two parts:

- The “Licensee Profile”; and
- The ‘Authorised Representative Profile’.

Both parts should be read in conjunction so that you have a full understanding of the services being offered.

*Intelligent Planning is the trading name of
Dirigere Advisory Pty Limited
Australian Financial Services Licence number 524371*

Who is my financial adviser?

Your financial adviser is: Jonathon Pugliese
Address: 227 Wiltshire Drive, Kew, Vic 3101
Telephone: 03 7003 4779
Email: jonathon@llenpartfinancial.com

Jonathon Pugliese ASIC representative number 1254594 and Llenpart Financial Pty Ltd ASIC Corporate representative number 403219 are both authorised representatives of Intelligent Planning

What experience does my adviser have?

Jonathon Pugliese has over 14 years' experience in the financial services industry.

What qualifications does my adviser have?

Jonathon Pugliese has completed the following courses of study:

- 2016 - Diploma of Financial Planning - Diploma (AQF 5) - Kaplan Education Pty Ltd
- 2024 - Graduate Diploma of Financial Planning - Graduate Diploma (AQF 8) – Kaplan Higher Education Pty Limited
- 2025- SMSF Regulations and Taxation
- 2025- Chartered Retirement Planning Counsellor
- 2025- Accredited Behavioural Finance Professional

Jonathon Pugliese has also passed the industry Financial Adviser exam.

In addition, Jonathon Pugliese is a member of the following professional bodies:

- Financial Association of Advisers Australia

Who is responsible for the financial services provided?

Intelligent Planning is responsible for the financial services provided by Jonathon Pugliese and Llenpart Financial Pty Ltd within the scope of the authority described in this FSG and for the distribution of this FSG.

What kinds of financial services are you authorised to provide to me and what kinds of financial products do these services relate to?

Jonathon Pugliese is authorised by Intelligent Planning to provide financial services in:

- Deposit and payment products limited to:
 - Basic deposit products
 - Debentures, stocks or bonds issued or proposed to be issued by a government
- Life products including:
 - Investment life insurance products
 - Life risk insurance products
- Interests in managed investment schemes, including:
 - Investor-directed portfolio services
 - MDA services
- Retirement savings account products
- Securities
- Superannuation

Jonathon Pugliese is registered as a tax (financial) adviser and can in the course of providing personal advice provide tax related advice to retail clients about relevant financial products.

Please note that Jonathon Pugliese is not authorised to provide any services on behalf of Intelligent Planning except in relation to the financial products listed above.

Jonathon Pugliese also provides an advice review service. As part of this service, Jonathon Pugliese will conduct a review of your personal situation and their previous advice and recommend changes where they are needed.

How is my Adviser paid for services provided to me?

This FSG has previously outlined in Part 1 the source, method and amount of remuneration and other benefits payable to your adviser for the services provided to you.

Intelligent Planning will collect all commissions, fees and other benefits paid through financial institutions in connection with financial services provided by Jonathon Pugliese or Llenpart Financial Pty Ltd. Specific details of this will be provided to you in the SoA.

Intelligent Planning charges a flat fee amount for being authorised to provide financial services to clients. This fee is not based on any volume amounts or a percentage of fees to be received by Llenpart Financial Pty Ltd

Will anyone be paid for referring me to my Adviser?

From time to time another professional adviser may be paid by Llenpart Financial for providing a referral. The amount paid is not ascertainable; however, where any amount is payable, it will be fully disclosed in the 'Statement of Advice' (SoA) or any other advice document provided to you.

Further questions?

If you have any further questions about the services Intelligent Planning provides, please contact Llenpart Financial at admin@llenpartfinancial or on 03 7003 4779.

You should retain this FSG for your reference and any future dealings with Jonathon Pugliese, Llenpart Financial Pty Ltd or Intelligent Planning.