



# Financial Services Guide

**Your Service Provider is:  
Graham Financial Pty Ltd**

ABN 40 099 693 606

Australian Financial Services  
Licence Number: 327520

Dated: 1<sup>st</sup> September 2025



# TABLE OF CONTENTS

BEFORE YOU RECEIVE OUR ADVICE	2
SERVICES WE PROVIDE	5
OUR MANAGED DISCRETIONARY ACCOUNT SERVICES	6
OTHER SERVICES	9
HOW WILL WE CHARGE FOR THE SERVICE?	10
THE PLANNING PROCESS	12
WHEN YOU RECEIVE OUR ADVICE	13
OUR PRIVACY POLICY	14

# BEFORE YOU RECEIVE OUR ADVICE

## Lack of Independence

Section 923A of the Corps Act Restricts the use of the words independent, unbiased, or impartial in circumstances where a financial planning firm receives commissions.

**Life insurance is the only product where commissions are accepted. Graham Financial will accept commissions for life insurance products when directed by a client as their preferred choice of payment. Allowing clients this choice restricts us using the term independent when describing our services.**

Based in Toowoomba Queensland, Graham Financial is a locally owned boutique financial planning practice that operates under its own Australian Financial Services Licence (AFSL 327520).

You will have questions regarding our services. This Financial Services Guide ("FSG") is intended to inform you of certain matters relating to our relationship, prior to us providing you with financial services.

Graham Financial supports and is compliant with the Ethics and Rules of Professional Conduct as set out by the Financial Adviser Standards and Ethics Authority and the Financial Advice Association Australia (FAAA).

You are entitled to receive a Statement of Advice (SoA) whenever we provide you with any advice which considers your goals, objectives, financial situation and/or needs. The SoA will contain the advice, the basis on which it is given and information about fees, commissions and disclosures and conflicts which may have influenced the provision of the advice.

Graham Financial is proud to be an approved FAAA Professional Practice. This designation is reserved for only the highest calibre financial planning practices.

At Graham Financial our financial planners are highly skilled, educated, experienced and are committed to meeting the highest industry standards for continued education, ethics and professional conduct.



## Ben Graham

**Ben Graham is a Director and Responsible Manager at Graham Financial. He is a Certified Financial Planner® with a Graduate Diploma of Financial Planning from FINSIA and a Bachelor of Electrical Engineering from the University of Queensland.**

With over two decades of experience in the finance industry and nearly thirty years as an active investor, Ben brings a wealth of expertise to his role. Before entering the financial planning industry, he had a successful career in business, where he established and later divested an electronic banking business.

Ben possesses strong technical skills and a deep understanding of capital markets and their dynamics. His diverse background in engineering, business and investment provides him with unique insights into the intricacies of investing, structures, and planning, enabling him to provide tailored solutions to meet his clients' needs and objectives.

While serving a diverse client base, Ben specialises in advising high-net-worth individuals, including retirees, business owners, ASX-listed executives and charitable foundations.



## Martin Webb

**Martin Webb is a Director and Responsible Manager at Graham Financial. As a Certified Financial Planner®, Martin holds a Bachelor of Commerce from Griffith University, a Certificate of Applied Finance and Investment from FINSIA, and an Advanced Diploma of Financial Services (Financial Planning) from KAPLAN.**

Martin's career began in Western Queensland, where he worked for many years as an experienced sheep and cattle grazer on his family's property. He maintains strong ties to the grazing industry and continues to support many of Graham Financial's rural clients in building their financial security.

Driven by a passion for learning and new ideas, Martin completed his degree as a mature-age student and subsequently moved to Canberra. There, he worked in the Treasury and Finance Departments during the Howard and Costello years. His experience in developing public policy and collaborating with Government Ministers provides Graham Financial with valuable insight into government regulation and legislative changes affecting financial planning.

An active member of the Darling Downs community, Martin enjoys contributing to its growth and development.



## Jody Dening

**Jody is an Accredited Financial Planner® and an Authorised Representative of Graham Financial. Jody holds a Graduate Diploma of Financial Planning from Kaplan Professional.**

With nearly two decades of experience in the financial planning industry, she specialises in personal insurance, leveraging extensive knowledge to help clients protect what matters most. Beyond her advisory role, Jody collaborates closely with Ben and Martin to develop personalised strategies and produce advice documents that are tailored to each Graham Financial client.

Outside of the office, Jody has a passion for sports, especially the NBA. You will likely find her attending events, watching games, or discussing the latest in the world of sports. This enthusiasm for teamwork, strategy, and performance drives her dedication to delivering outstanding service for her clients.

Ben, Martin and Jody act on behalf of Graham Financial. Graham Financial is responsible for the financial services offered to you. Graham Financial authorises the distribution of this FSG.

The contact details for Graham Financial are shown on the back cover of this FSG.

# SERVICES WE PROVIDE

Graham Financial offers a complete financial advisory service that is personalised and tailored to your unique situation. Our holistic approach will provide significant and long-term benefits to your financial outcome.

Graham Financial provides services that impact every aspect of your financial outcome:

- Investment;
- Cashflow;
- Risk Management;
- Events;
- Debt Management;
- Estate Planning; and
- Structuring.

Graham Financial is licensed to provide advice on, and deal in, the following products to retail and wholesale clients:

- Separately Managed Accounts (SMAs)
- Managed Funds;
- Securities (Shares);
- Deposit and Payment Products;
- Managed Investment Schemes;
- Managed Discretionary Account (MDA) Services;
- Government Debentures, Stocks & Bonds;
- Life Insurance Risk;
- Life Insurance Investment Products;
- Superannuation; and
- Retirement Savings Account Products.

Access to financial products and ongoing investment advice is available under a Managed Discretionary Account (MDA) or a client directed advice model.

The choice of model is at the discretion of each client. Each model can be revoked by the client at any time and clients can change between models at any time without charge.

# OUR MANAGED DISCRETIONARY ACCOUNT SERVICES

We offer Managed Discretionary Account (MDA) services where 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.

Please note, the MDA Service does not authorise us to open new accounts, withdraw funds, or contribute new funds to your investment.

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

By authorising us to make changes to your investments without seeking your prior authority, you cannot claim we were not acting on your behalf. Provided we act within that authorisation, our acts become binding on you. Therefore, it is important you understand what we are authorised to do and carefully read and understand the activities that you are authorising us to perform on your behalf.

## How can you give Graham Financial instructions on how to exercise rights relating to the 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, and you can provide us with instructions at the time as to how you wish for us to proceed. Our contact details are on the back cover of this FSG.

## Do you have to enter into a contract to receive MDA services?

Yes. To receive MDA services, you must first enter into an MDA contract. This contract will specify the terms and conditions of the authority and the investment program, which sets out how your money will be invested.

## Who prepares the investment program?

We will prepare the investment program for you based on your relevant personal circumstances, financial objectives and needs.

## Will the investment program in the MDA contract comply with the law?

Where this is relevant, the investment program set out in the MDA contract will comply with the law. The relevant law is Division 3 of Part 7.7 of the Corporations Act.

The contract will also contain:

- 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 relating to your relevant personal circumstances and specify that the MDA service may cease to be suitable for you if your relevant personal circumstances change.

### Who is responsible for reviewing the investment program?

We are responsible for reviewing your investment program. We will review your investment program at least every 12 months.

### Are custodial or depository services provided for your portfolio?

We do not provide custodial or depository services. Either you will hold the investments in the portfolio, or a relevant custodian nominated platform will hold them for you.

### Is there a cost for the MDA contract or the MDA?

There is no additional cost to access the MDA service. Total costs will vary between clients depending on the complexity of the scenario and the level of funds being invested.

All fees are detailed in the SoA provided prior to commencement. Indicative quotes are available at the initial consultation.

In relation to the portfolio we manage for you, we advise the following fees and costs will be incurred in the normal course of business, noting that the format of this disclosure has been mandated for all MDA operators by the Australian Securities & Investments Commission (ASIC).

Type of fee or cost	Amount	How and when paid
Fees when your money moves in or out of the portfolio	n/a – not a cost to you under our arrangement	n/a
Establishment fee The fee to open your portfolio	n/a – not a cost to you under our arrangement	n/a
Contribution fee The fee on each amount contributed to your portfolio	n/a – not a cost to you under our arrangement	n/a
Withdrawal fee The fee on each amount you take out of your portfolio	n/a – not a cost to you under our arrangement	n/a
Exit fee The fee to close your portfolio	n/a – not a cost to you under our arrangement	n/a



Management costs		
The fees and costs for managing your portfolio	Fees paid to individual managers are shown on the product statements in the appendices of your SoA or Review document.	These fees are paid from your investments. Fees will vary according to each manager.
Service fees		
Switching fee The fee for changing portfolio options	n/a – not a cost to you under our arrangement	n/a

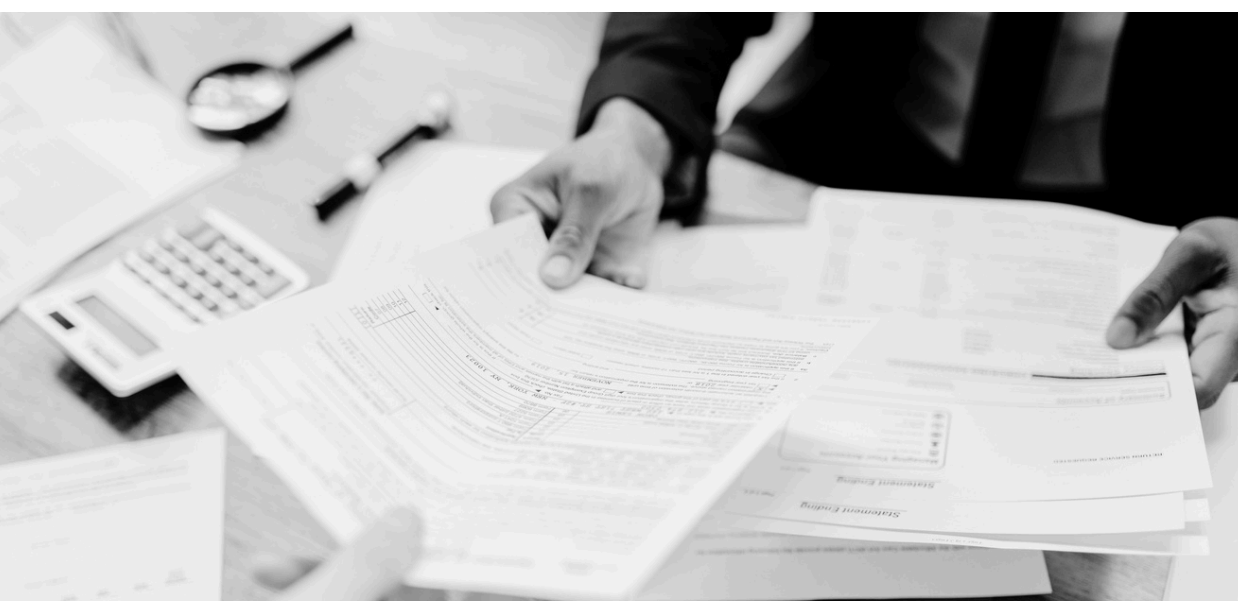
### Our authority to offer MDA services

Graham Financial holds an AFSL authorisation permitting us to provide MDA services.

This FSG complies with the ASIC Corporations (Managed Discretionary Account Services) Instrument 2016/968.

### Portfolio Monitoring

Internal databases are maintained detailing client investments recommended by Graham Financial that sit outside of the managed discretionary model. This does not constitute portfolio monitoring. We recommend portfolios should be reviewed on an annual basis, subject to the client's discretion. The fee for this service is included as part of the advisor service fee unless otherwise stated.



# OTHER SERVICES

## **Review Services**

It is important that your investment portfolio is reviewed on a regular basis to ensure that it continues to meet your financial objectives and addresses any of your concerns. The performance of the investment portfolio should also be reviewed regularly to assess the effects of changing economic and market conditions.

The review process will address:

- How your personal circumstances or needs may have changed;
- The economic environment;
- Fund manager and investment performance;
- Investment sector performance;
- Your taxation position and the tax position of your investments;
- Social security issues; and
- Investment availability and suitability.

As all these factors are subject to change and as such changes may have a significant impact on the suitability of your investment portfolio, we offer the option of ongoing advisory services that includes regular written reports on the valuation and status of your investment portfolio. This will enable you to review your financial strategy regularly and to change your portfolio as required. The fee for this service is included as part of the advisor service fee unless otherwise stated.

## **Risk Management Advice**

Insurance is used as a means of managing risk or minimising your exposure to potential financial loss. Reviews will include the evaluation of your exposure to risk and to arrange insurance on your behalf where appropriate.

## **Direct equities**

We offer a full service or passive service model.

### **Full Service**

Graham Financial will monitor, evaluate, and where we deem appropriate, execute all corporate actions. The full service model requires clients engage using the Managed Discretionary Account (MDA) service with equities held on an investment platform.

### **Passive Service**

The passive service allows the utilisation of an investment platform administration capability only. All investment decisions including corporate actions remain client directed.

Clients that hold direct equities on an external investment platform may seek to engage advice on an ad hoc basis as required. Any details of equities held in this manner are to be assumed to be held on record for information purposes only.

Services provided for direct equities held externally are completely client directed and charged on a user pays basis. There is no oversight or responsibility by Graham Financial for investment decisions or corporate actions.

# HOW WILL WE CHARGE FOR THE SERVICE?

Graham Financial offers highly personalised professional services tailored to meet each client's individual needs. The fee charged will reflect the complexity and unique needs of each individual and as such a "standard" fee schedule has not been set.

Graham Financial operates on a fee-for-service basis. Fees may be charged as a flat rate or based on the level of funds you have invested with us. Fees for insurance products may be paid by commissions or direct to Graham Financial. All fees are disclosed prior to the engagement of Graham Financial and may be invoiced at various stages of the financial planning process.

Fees may be charged on an hourly service rate. Financial planner rates will be charged at \$350 per hour plus GST and Administration or Paraplanner services charged at \$150 per hour plus GST.

## How can you provide instructions to Graham Financial?

Directions and instructions can be provided in person, email, post or telephone to the address provided on the back page.

## Does Graham Financial receive remuneration, commission, fees or other benefits in relation to providing the financial services and how is that commission calculated?

All revenue is paid to Graham Financial. All advisers and staff are paid a salary by Graham Financial. A bonus may be paid at the discretion of the shareholders of Graham Financial.

Where a life insurance company product has been recommended, the issuer of the life insurance product may pay Graham Financial a commission on the first year's premium once cover has been accepted and on subsequent years' renewal payments as they fall due. You may choose to pay this fee direct to Graham Financial in return for a lower premium paid to the insurance provider. All fees are disclosed prior to engagement.

Where a stockbroking service is utilised to deal in shares, Graham Financial may charge a fee to undertake that service. Unless otherwise stated the minimum transaction fee charged will be \$110 and the maximum fee 1.1% per trade. You will be advised of the charges prior to engaging in a transaction.

The exact amounts of any fees, commissions, bonuses or other incentives received will be included in a SoA provided to you.

We accept remuneration for our work either by commission, fee paid direct from your investment held on Platform or a direct fee to you.

## Do any relationships with Product Providers exist which might influence us in providing you with financial services?

Graham Financial does not use any product that would exclusively tie you to us and is able to place investments with any provider. We do not accept loans or otherwise enter into arrangements with Product Providers that would obligate us to do business with them. We work with providers of our own choosing.

We regularly evaluate our research and software systems which are based on our assessment of the best available to accommodate our needs in providing service to clients. We work interactively with our service providers to encourage and help them to improve their systems. In accordance with disclosure requirements under the FAAA and FASEA Industry Code of Practice on Alternative Forms of Remunerations, we hold a register of such events and costs which is available for your perusal upon request.



# THE PLANNING PROCESS

Financial planning is the process of developing and successfully implementing strategies that define your financial outcome. Whatever your goals and objectives, a properly implemented financial plan will give you a pathway to achieving them.

Developing a comprehensive or a scaled financial plan will require prospective clients to gather critical information. The greatest benefits will be gained by those people who are prepared to put in the effort to engage in the process.

The process can be described as follows:

1. Gathering your financial information - This is through a fact find and meetings with the adviser. You have the right not to divulge information to us however incomplete or inaccurate data may result in inappropriate advice;
2. Identification of your goals, objectives, investment risk profile and any existing or future financial issues;
3. Preparation of a financial plan - An engagement letter may be provided at this stage authorising us to proceed to a SoA;
4. Presentation of the SoA and strategies is best achieved face to face. It is very important that you are satisfied that all issues are addressed to your satisfaction;
5. Authorisation and implementation of the recommendations; and
6. Review and revision of the plan at regular intervals.

# WHEN YOU RECEIVE OUR ADVICE

## What should you do if you have a complaint about the provision of our financial services?

Graham Financial is a member of the Australian Financial Complaints Authority (AFCA) [member number 13300].

We are committed to providing quality advice to our clients. If you have any complaint about the service provided, you should take the following steps:

1. Contact our office and tell us about your complaint.  
We have internal complaints procedures in place and are keen to resolve any issue that may be creating a problem. We will seek to resolve your complaint quickly and fairly. If resolution cannot be found internally after 30 days, then the matter can be referred to AFCA for external dispute resolution.
2. If an issue has not been resolved to your satisfaction, you can lodge a complaint with AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

**Website:** [www.afca.org.au](http://www.afca.org.au)

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Telephone:** 1800 931 678 (free call)

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

If your concerns involve ethical conduct, you may wish to consider raising your concerns in writing with the Financial Advice Association Australia.

**Website:** [www.faaa.au](http://www.faaa.au)

**Telephone:** 1300 337 301

**In writing:** Financial Advice Association Australia, GPO Box 4285, Sydney NSW 2001

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

## Professional Indemnity Insurance

Graham Financial holds Professional Indemnity Insurance cover for the activities conducted under our AFSL. The limit of the indemnity is \$5,000,000 for each and every claim and in the aggregate for the period of insurance with automatic reinstatement of the sum insured for all claims arising out of our AFSL activities.

The insurance will cover claims in relation to the conduct of authorised representatives and employees who no longer work for the Licensee (but who did at the time of the relevant conduct). We believe our Professional Indemnity Insurance cover satisfies the requirements of s.912B of the Corporations Act.

# OUR PRIVACY POLICY

Only necessary personal information is collected for the purposes of assisting you with your financial planning needs.

Standard Data Collection processes are used with your assistance by fair and lawful means.

You are informed at or before the time of collection of personal information (or as soon as possible after) of:

- The identity of our organisation and how to contact us;
- The fact you can gain access to the information;
- The purposes for which the information is collected;
- Organisations to which Graham Financial usually discloses information of that kind, examples include but may not be limited to: ATO, Centrelink, compliance auditors;
- Any law that requires the information to be collected; and
- The consequences of not providing the information.

Graham Financial undertakes reasonable steps to ensure that the personal information collected is accurate, complete and up to date.

Graham Financial undertakes reasonable steps to:

- Protect the personal information it holds from misuse, loss and from unauthorised access, modification or disclosure; and
- To destroy or permanently de-identify personal information if it is no longer needed regardless of when the information was collected.

Upon request, we will take reasonable steps to disclose the sort of personal information the organisation holds, for what purposes and how it collects, holds, uses and discloses that information.

If Graham Financial holds personal information about an individual, it undertakes, upon receiving a request by that individual, to allow access to the information by a third party.

Requests will be acknowledged within 14 days. Straightforward requests will be dealt with within a further 14 days and more complex requests dealt with within a further 30 days.

Charges may be levied for providing access to this information. However, it will be done at cost and not be excessive and will not apply to lodging the initial request for access.

In certain limited circumstances where access may be refused, an explanation for that denial will be provided to the individual.

Graham Financial seeks to provide information to clients irrespective of the time frame over which it has been collected.



[www.grahamfin.com.au](http://www.grahamfin.com.au)



**Contact details:**

PO Box 2622

Toowoomba Queensland 4350

Ph (07) 4613 0514

Email [admin@grahamfin.com.au](mailto:admin@grahamfin.com.au)

Web [www.grahamfin.com.au](http://www.grahamfin.com.au)

**Office location:**

Suite 1, 124 Margaret Street  
Toowoomba Queensland 4350

**SCAN ME**

