



# Financial Adviser Disclosure Statement

This Disclosure Statement provides you important information about me in my capacity as a Financial Adviser employed by Craigs Investment Partners Limited. This Disclosure Statement was prepared on 15 March 2021.

## 1. Contact details

I am a Financial Adviser and I give financial advice on behalf of Craigs Investment Partners Limited ("Craigs Investment Partners"). Craigs Investment Partners holds a financial advice provider ("FAP") licence issued by the Financial Markets Authority to provide financial advice services. Please find my contact details below:

<b>Name</b>	Robert David Ewing Garden
<b>Registration number</b>	FSP44121
<b>Postal address</b>	Level 4, 229 Moray Place, PO Box 5545 Dunedin 9054
<b>Telephone number</b>	+64 (3) 951 0218
<b>Freephone number</b>	0800 888 866
<b>Email</b>	robert.garden@craigsip.com

## 2. Nature and scope of financial advice service

As a Financial Adviser, I am able to provide advice on financial products including, but not limited to, equities, bonds and other fixed income investments, managed funds, KiwiSaver and superannuation savings. I am also able to provide investment planning services and discretionary investment management services ("DIMS").

All services provided to clients are subject to our Terms and Conditions (as amended from time to time).

## 3. Duties information

As a Financial Adviser, I am subject to certain obligations contained in the Financial Markets Conduct Act 2013 and the Code of Professional Conduct for Financial Advice Services. As from 15 March 2021 I am required to:

- meet certain competency, knowledge, and skill requirements;
- meet ethical, conduct, and client care standards;
- give your interests priority;
- ensure my financial advice is not materially influenced by my own or Craigs Investment Partners' interests; and
- exercise care, diligence, and skill when providing financial advice to you.

## 4. Fees, expenses, or other amounts payable

The following charges may apply on the services we or our subsidiaries provide to you:

Fee Type	Fee
<b>Brokerage</b>	Brokerage fees are incurred when purchasing and selling securities and are based on the value of the transaction. Brokerage fees vary depending upon the security being traded and the exchange they are traded on.  A minimum brokerage fee applies for each market. Any agency fees are included in the brokerage fees. Additional transaction fees up to 1% including levies and taxes (e.g. stamp duties) will be added to brokerage fees, where they are charged.  All brokerage, agency and transaction fees are payable on settlement of each transaction. Minimum fees are available on request.
<b>Portfolio Management</b>	An annual fee of up to 1.25%, based on the market value of the portfolio, will be charged. Portfolio fees are calculated at the end of each calendar quarter and are payable quarterly in arrears in the month following the end of each calendar quarter.  Portfolio fees include investment advice and ongoing portfolio monitoring, and provision of custodial services, including the transacting of corporate actions. A minimum fee applies.
<b>Superannuation, KiwiSaver and Managed Investment Schemes</b>	We offer a range of superannuation and KiwiSaver products and a range of Managed Investment Schemes.  Entry, Exit, Custodial and Management fees may apply. For specific details please refer to the latest Product Disclosure Statement.
<b>Custodial Services</b>	An annual fee of up to 0.625%, based on the market value of your portfolio will be charged. Custodial fees are calculated at the end of each calendar quarter and are payable quarterly in arrears in the month following the end of each calendar quarter. A minimum fee applies. Alternatively a fixed dollar charge per security held can be applied.

<b>Foreign Exchange</b>	No fixed fee is charged in relation to providing foreign exchange services, although we may earn a margin of up to 1.25% on any foreign exchange transaction we undertake for you. The margin will be the difference (if any) between the exchange rate that we provide to you for the transaction (the "client rate") and the exchange rate provided to us by the transacting bank for that exchange transaction (the "wholesale rate").
<b>Cash Management Accounts</b>	<p>The Cash Management Nominee may charge commission to the respective bank where a deposit has been made through the Cash Management Account(s). If charged, this commission is taken into account in setting the interest rate(s) paid on a Cash Management Account. All costs of administering the Cash Management Accounts by the Cash Management Nominee are met from the commission charged by it (though transaction fees may be imposed in certain circumstances for specific clients).</p> <p>The current rates of commission in respect of the Cash Management Accounts are calculated on a tiered rate up to a maximum of 1.25% per annum calculated on the actual balance on the account. Please note this is a maximum and does not necessarily reflect the amount charged at any point in time. Further information on the rates of commission and rates of gross interest may be obtained from your Financial Adviser.</p> <p>A break fee of \$30 may be charged for the early redemption of a term deposit.</p>

Certain investment funds may also have fees and expenses, including performance fees in some cases, which are charged by the manager and trustees. These fees and expenses will be reflected in the investment fund's unit price and may therefore indirectly affect your returns.

## 5. Conflicts of interest and commissions or other incentives

### Conflicts of interest

Craigs Investment Partners has the following relationship(s) with the relevant organisations which may give rise to a conflict of interest. For the purposes of the Financial Markets Conduct Act 2013, a conflict of interest means any interest of Craigs Investment Partners, myself, or any other person connected with the advice in which a reasonable client may find reasonably likely to materially influence our advice:

Relevant Organisation	Description of Relationships
<b>CIP Cash Management Nominees Limited (Cash Management Nominee)</b>	The Cash Management Nominee, a wholly owned subsidiary, established to hold deposits on bare trust for clients who have Cash Management Account(s). Accounts are held with selected registered banks.
<b>CIP Nominees No 1 Limited</b>	CIP Nominees No 1 Limited, a wholly owned subsidiary, is the nominee company for the mySTART Service.
<b>Craigs Investment Partners Superannuation Management Limited (CIPSML)</b>	CIPSML, a wholly owned subsidiary, formed to develop and manage Superannuation and KiwiSaver Schemes.
<b>Custodial Services Limited (CSL)</b>	CSL, a wholly owned subsidiary, provides custodial services to Craigs Investment Partners' clients as well as a number of clients independent of Craigs Investment Partners.
<b>Fonterra Co-operative Group Limited</b>	Craigs Investment Partners is the Registered Volume Provider (market maker) for the Fonterra Shareholders Market.
<b>J.P. Morgan Securities Australia Limited (JPM)</b>	Craigs Investment Partners and J.P. Morgan Securities Australia Limited have formed a strategic alliance which is designed to offer a broader range of products and services to our respective corporate and private wealth clients.
<b>QuayStreet Asset Management Limited (QuayStreet)</b>	QuayStreet, a wholly owned subsidiary, formed to develop and manage a range of funds and a KiwiSaver Scheme.
<b>Wilsons Holdings Company Pty Ltd and its Group companies (Wilsons)</b>	<p>Wilsons is the private wealth, corporate advisory, institutional equities and research arm of Wilsons Holdings Company Pty Ltd. Wilsons is 50% co-owned by Wilsons' employees and 50% by Craigs Investment Partners.</p> <p>Wilsons Advisory and Stockbroking Limited provide execution and settlement services for Craigs Investment Partners in relation to Craigs Investment Partners clients trading in issuer sponsored securities on the ASX.</p> <p>Craigs Investment Partners may receive income from Wilsons based on fees generated.</p> <p>Craigs Investment Partners Advisers who are shareholders of CIP Holdings Limited could potentially receive benefit from Wilsons by way of business profits.</p> <p>Craigs Investment Partners relationship with Wilsons could influence Craigs Investment Partners to recommend financial products where Wilsons has been engaged by the Issuer (for example, as lead manager), because Craigs Investment Partners may earn brokerage or receive other benefits for the distribution of those products.</p> <p>Craigs Investment Partners clients are not obliged or restricted to securities (primary or secondary) that originate from a Wilsons transaction. Craigs Investment Partners Advisers may have an increased chance of securing their clients 'stock' when Wilsons is mandated</p>

	but would only receive normal industry brokerage/fees from such transactions. These fees and when Wilsons is mandated on a transaction will be disclosed to clients.
<b>Zespri Group Limited</b>	Craigs Investment Partners provides a market maker service to Zespri Group Limited.

Craigs Investment Partners operates a conflicts of interest policy which is designed to identify potential conflicts that may exist and then ensure any actual or perceived conflict is managed in an appropriate manner (this is typically done by disclosing that conflict). The policy is constructed to ensure at all times Financial Advisers place the interests of their clients above their own interests.

#### Remuneration and commissions

Craigs Investment Partners manages any conflicts of interest arising from the receipt of remuneration and commissions in compliance of the following:

- I am under no contractual obligation to promote any one product over another;
- I am required to ensure adequate disclosures are made internally to the Craigs Investment Partners Compliance Team and to clients where potential conflict exists;
- Craigs Investment Partners monitors trading activities undertaken by Financial Advisers to ensure that no trading occurs which could be detrimental to clients.

Revenue may come from fees, brokerage and margins earned by Craigs Investment Partners which are detailed in section 4 Fees, expenses or other amounts payable of this Disclosure Statement.

Staff, who are shareholders in CIP Holdings Limited (a holding company for Craigs Investment Partners employee share ownership), will receive any distributions paid by CIP Holdings Limited to its shareholders. Craigs Investment Partners Advisers who are shareholders of CIP Holdings Limited could potentially receive benefit from clients who invest in products offered by companies in the table below.

The type and potential levels of remuneration are set out below:

Relevant Organisation	Potential Conflict of Interest
<b>CIP Cash Management Nominees Limited (Cash Management Nominee)</b>	<p>Craigs Investment Partners receive a share of any commission charged by Cash Management Nominee. A portion of any commission received is attributed to Craigs Investment Partners Advisers</p> <p>Craigs Investment Partners clients with accounts through one of our custodial services are required to open an account with CIP Cash Management Nominee.</p> <p>Craigs Investment Partners clients with accounts through one of our other services are not required to open an account with CIP Cash Management Nominee.</p> <p>Craigs Investment Partners clients are not restricted from having cash facilities with other financial service providers.</p>
<b>Craigs Investment Partners Superannuation Management Limited (CIPSML)</b>	<p>Craigs Investment Partners receives a fee from CIPSML for the provision of administration, investment management and registry services provided under a management agreement between Craigs Investment Partners and CIPSML (in relation to the Craigs Investment Partners Superannuation Scheme "superSTART", Craigs Superannuation Scheme and the Craigs KiwiSaver Scheme).</p> <p>Craigs Investment Partners Advisers receive remuneration calculated as a % of total revenue attributed to them.</p>
<b>Custodial Services Limited (CSL)</b>	<p>Craigs Investment Partners Advisers receive remuneration calculated as a % of total revenue attributed to them.</p> <p>Craigs Investment Partners clients are not restricted to using CSL for custodial services and CSL does not restrict the types of securities a client can invest in.</p>
<b>Fonterra Co-operative Group Limited</b>	<p>Craigs Investment Partners is the Registered Volume Provider (market maker role) for the Fonterra Shareholders Market and receives a fee for undertaking this role.</p>
<b>QuayStreet Asset Management Limited (QuayStreet)</b>	<p>Craigs Investment Partners receives a fee from QuayStreet for the provision of administration and registry services in relation to the QuayStreet KiwiSaver Scheme and administration services in relation to the QuayStreet Funds.</p> <p>Craigs Investment Partners Advisers receive remuneration calculated as a % of total revenue attributed to them.</p> <p>Craigs Investment Partners relationship with QuayStreet could influence Craigs Investment Partners to favour investments managed by QuayStreet.</p> <p>Craigs Investment Partners clients are not restricted to QuayStreet products.</p>
<b>Zespri Group Limited</b>	<p>Craigs Investment Partners provides a market maker service to Zespri Group Limited and receives a fee for providing this service.</p>

Craigs Investment Partners may receive management fees, advisory fees, commissions, underwriting and firm commitment fees for providing services to the Issuer of securities in relation to public offerings, capital raisings and corporate activity.

I, Craigs Investment Partners or an associated person may have a direct or indirect pecuniary or other interest in giving investment advice to you. I, Craigs Investment Partners or an associated person will or may receive remuneration directly or indirectly, from a

person other than yourself as an investor and in connection with the giving of investment advice to you or a transaction resulting from the giving of investment advice to you.

I, or a Prescribed Person (as defined in the NZX Participant Rules) may, from time to time, hold securities, which are the subject of advice given to you. These holdings may constitute a threshold interest in the security, which I am recommending to you or which you may buy or sell. A threshold interest is an interest that exceeds \$250,000 NZD, or equivalent value, of the security on issue.

## 6. Complaints process

If you have a problem, concern, complaint or expression of dissatisfaction in connection with any of the services that I or Craigs Investment Partners have provided, you should, in the first instance, promptly (in writing and/or verbally) detail the particulars of the matter to your adviser. Alternatively, you can put your complaint in writing to the Head of Compliance using the following contact details:

<b>Postal address</b>	Craigs Investment Partners Limited Attention: Head of Compliance PO Box 13155 Tauranga Central Tauranga 3141
<b>Telephone number</b>	+64 7 577 6049
<b>Email</b>	compliance@craigsip.com

We have an internal complaints procedure to ensure all complaints are dealt with properly. We will:

1. Acknowledge receipt of the complaint within 2 business days of receipt of the complaint.
2. Ensure that the complaint receives proper consideration.
3. Act in good faith in dealing with the complaint.
4. Obtain all relevant information to investigate the complaint.
5. Communicate the determination and any remedies no later than 40 business days after receipt of the complaint.

## 7. Dispute resolution process

We will try to resolve your complaint in good faith. If the complaint in relation to our financial advice service is not resolved to your satisfaction through Craigs Investment Partners' internal complaints process, you as a complainant have access to a free, independent resolution service, and that service may help investigate or resolve your complaint. Craigs Investment Partners is a member of Financial Services Complaints Ltd, an external dispute resolution scheme. You can contact Financial Services Complaints Ltd at:

Financial Services Complaints Ltd

PO Box 5967

Lambton Quay

Wellington 6145

Email: [complaints@fscl.org.nz](mailto:complaints@fscl.org.nz)

Telephone +64 (4) 472 3725 or call free on 0800 347257

We are regulated by NZRegCo and the Financial Markets Authority. If you are unsatisfied with our service you may also contact NZRegCo or the Financial Markets Authority at:

NZRegCo

Chief Executive Officer

PO Box 2959

Wellington 6140

Email: [participant@nzregco.com](mailto:participant@nzregco.com)

Telephone +64 (4) 472 7599

Financial Markets Authority

Email: [questions@fma.govt.nz](mailto:questions@fma.govt.nz)

Telephone +64 3 962 2698 or call free on 0800 434 566.

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