# Financial Services Guide

GODFREYPEMBROKE

*Financial Advice Specialists*

Version 8, 16 July 2026

# Important Information

### Financial Services Guide

This Financial Services Guide (FSG), is designed to clarify who we are and what we do, and to help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you;
- how we and our associates are paid and – any other benefits we may receive;
- any potential conflicts of interest we may have;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it's full of useful information – and is also worth holding on to for future reference. The Privacy Notification section is worthwhile reading as it gives you further clarity on how we handle your personal information. And of course, if you ever have any questions, please contact us.

### Other documents you may receive

In addition to this FSG, if we provide you with financial advice we will also present you with a written Statement of Advice (SOA). This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the '**Contact us**' section of this FSG for our contact details.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

### Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the '**Contact us**' section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (e.g. email or letter) or another method agreed with us.

### Not Independent

Godfrey Pembroke Group Pty Ltd (Godfrey Pembroke) is not independent, impartial or unbiased because we may receive commissions on life insurance products we recommend to our clients.

# About Us

## Who we are

We are highly qualified and experienced financial planners who specialise in providing guidance to high net worth individuals, business owners, professional executives and their families.

Through a trusted personal advisory relationship, we empower our clients to accumulate and grow wealth – and in the right way, through effective tax management and cost efficient strategies.

The following financial advice specialists are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you:

**Naomi Mee-Martino**

**Authorised Representative No. 338544**

Director of Bastion Financial Group, Naomi has been part of the financial services community since 2005. A CFP® Professional, Naomi combines experience from both the boutique private practice and corporate worlds to deliver Advice Excellence to her clients.

Starting with a Bachelor of Arts in Economics, Naomi then completed a Post-Graduate Diploma in Business Studies. Naomi has also completed the Diploma of Financial Planning (Dip. DP) and Advanced Diploma in Financial Planning (ADFP). She is a Member of the Financial Advice Association of Australia (FAAA) and is also the Chair for the Western Australian Chapter of the FAAA. Naomi also sits on the School of Accounting, Economics and Finance (SAEF) Financial Planning Discipline Advisory Panel at Curtin University.

The Financial Services that the above financial advice specialists offer are provided by Bastion Financial Wealth Management Pty Ltd (ABN 96 686 597 615), Authorised Representative (AR) No. 1315155.

Your financial advice specialists are Representatives of and offer services on behalf of Godfrey Pembroke.

Godfrey Pembroke has authorised your financial advice specialists to provide you with this Financial Services Guide.

# About Godfrey Pembroke Group Pty Ltd

At Godfrey Pembroke Group Pty Ltd (Godfrey Pembroke), we are committed to delivering a comprehensive suite of financial advice services tailored to meet the diverse needs of our clients. Our network of experienced financial advice specialists brings deep technical expertise and a strong understanding of complex financial matters.

Since our establishment in 1981, Godfrey Pembroke has built a reputation for excellence, underpinned by a legacy of personalised service and a steadfast focus on our clients' goals. We are proud to be an adviser-owned and adviser-led licensee, where equity participation fosters a shared commitment to professionalism, accountability, and the delivery of high-quality financial advice. This structure ensures our advisers are actively engaged in shaping the direction, culture, and service standards of our group—reflecting our belief in the value of trusted relationships and enduring client outcomes.

Our financial advice specialists are representatives of Godfrey Pembroke Group Pty Ltd ABN 38 078 629 973 Australian Financial Services Licensee 245451, of Lawson Place, Suite 409, Level 4, 167 Phillip Street, Sydney NSW 2000.

Our corporate authorised representatives are required to pay a flat fee to the licensee (Godfrey Pembroke) for the provision of licensing, compliance, and support services.

## Our associations and relationships

If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC's Money Smart website (www.moneysmart.gov.au/investing/financial-advice).

Godfrey Pembroke financial advice specialists are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

## Approved Product List

Our Approved Products List (APL) is a list of what we consider to be sound quality, fully researched products, but doesn't include all possible products available in the market. Only products and services that have been examined by our experienced research consultants are placed on our APL.

When selecting products for you, we are generally limited to the range of investment products and a selection of 12 insurance providers on the APL.

Your adviser will first source from the APL before providing any recommendations. They will only recommend a product or service after considering its appropriateness in relation to your individual objectives, financial situation, needs and best interests. Where your strategy requires products and services other than those on the APL to act in your best interests, the Godfrey Pembroke Group research consultants will be consulted, and we will seek to find an alternative solution.

## What we do

We are authorised by Godfrey Pembroke to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Superannuation
- Retirement Savings Accounts
- Securities
- Standard Margin Lending Facilities

## Contact us

For more information on anything you have read in this document or if there is anything else we can help you with, please contact us at:

Address: Level 30, 1 Spring Street, Perth WA 6000
Phone: 08 6225 5150
Email: admin@bastionfinancialgroup.com.au

# Your confidence in our advice

Your satisfaction is of paramount importance to us and we have procedures in place to resolve any concerns promptly, and fairly.

## Our complaints procedure

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial advice specialist know in the first instance. You can also raise your complaint at any time by contacting us at:

   Godfrey Pembroke Group Advice Dispute Resolution
   Lawson Place, Suite 409, Level 4, 167 Phillip Street, Sydney NSW 2000 or GPO Box 5433, Sydney NSW 2001

   **Phone**: 1300 856 286
   **Email**: service@godfreypembroke.com.au

2. If your complaint isn't resolved within 30 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):

   **Website**: www.afca.org.au
   **Email**: info@afca.org.au
   **Telephone**: 1800 931 678 (free call)
   **In writing to**: Australian Financial Complaints Authority Limited, GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Godfrey Pembroke holds professional indemnity insurance that satisfies the requirements of section 912B of the Corporations Act. This insurance also covers the conduct of financial advice specialists who were authorised by us at the time of your complaint but are no longer representatives of Godfrey Pembroke.

# Payments and benefits we receive

At Godfrey Pembroke we believe you deserve transparency and we want to ensure all our recommendations are driven by your needs alone. This is why Godfrey Pembroke has led the industry in implementing a fee-for-advice model (back in 2006), and we will continue to do so. This model allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based on:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- by direct invoice from us for initial and ongoing advice;
- in some circumstances, where possible, as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- where applicable, we may be paid a commission by the financial product issuer(s);
- where applicable, via commission we may receive from a financial product provider when you commence an insurance contract and ongoing commission annually during the life of the insurance contract; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time. Please refer to the "**How we charge for our services**" section of this FSG for further information.

## How is your advice specialist paid

Naomi Mee-Martino is not an employee of Godfrey Pembroke. She is a Director/Shareholder of the corporate authorised representative and in addition to a salary, she may be entitled to other remuneration in the form of distributions, dividends, bonuses and profit share.

Naomi Mee-Martino is a director and through her related entity is a shareholder of GPG Unit Pty Ltd ACN 676 191 389, the parent company of Godfrey Pembroke Group Pty Ltd, which means she may receive dividends and/or income from the parent company. This ownership reflects our structure as an adviser-owned and adviser-led licensee, where equity participation supports our commitment to professionalism and the delivery of quality financial advice.

## Further details on payments we may receive

You may request details of any fees, commissions or other benefits we receive in connection with any financial service we provide to you, even if personal advice is not given.

## Benefits we may receive

In the course of providing advice, we may receive benefits from product providers. These benefits may include:

### Conferences

Our financial advice specialists may attend conferences and professional development seminars that have a genuine education or training purpose. Godfrey Pembroke may pay for the costs of travel and accommodation, and events and functions held in conjunction with the conference or seminar.

### Non-monetary benefits

Godfrey Pembroke and your financial advice specialist maintain a public register outlining the alternative forms of remuneration that are payable to, and by us e.g. benefits valued between $100 and $300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting your financial advice specialist.

### Sponsorship

Godfrey Pembroke receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and we do not directly share in the sponsorship payment; however, we may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.

# Referrals

## Referrals from a third party

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

## Referrals to a third party

At present we do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

# How we charge for our services

Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

| | |
|---|---|
| **Initial consultation** | At our expense. |
| **Advice preparation** | If you elect to pay us a fee for advice the following fees will apply. The fees will depend on the size of the investment portfolio and the complexity of the advice:<br>The minimum fee charged is $4,400 while the maximum fee is $25,000.<br>For example, complex advice that contains multiple goals, strategies and/or tax structures including but not limited to; self-managed superannuation funds, family trusts and companies, are likely to be charged closer to the maximum. Less complex advice that addresses limited goals, strategies and tax structures are likely to be charged closer to the minimum. |
| **Implementation** (fee for advice) | This fee will be agreed prior to preparation of the Advice and included in the above preparation cost.<br>Fees may be paid directly by you or collected through the product issuer. |
| **Client Service Agreement** | You can elect to enter into a 12-month Client Service Agreement (Agreement) as part of your financial planning strategy so you can receive advice services such as a meeting to review your plan. Details of the services will be set out in your Agreement.<br>The fee can range from a minimum of $8,800 while the maximum will be dependent on the complexity of your situation and the services required. The fee applied will be commensurate to the level of service needed and the complexity of the advice provided and will be outlined and agreed with you in the Agreement. The fee applied will be in line with our documented Fee Methodology across advisory services required and assets under management. |
| **Ad hoc advice** | Where you do not wish to participate in a 12-month Client Service Agreement but require ongoing advice on an ad hoc basis, an hourly fee of $550 may apply. |
| **Execution only service** | Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, a one-off minimum of $220 and a maximum of $550 fee may apply. |

**Insurance products**

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commission to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

| Date policy is issued | Initial Commission (% of annual policy cost including GST) | Ongoing Commission (% of annual policy cost including GST) |
|---|---|---|
| **Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)** | up to 130% | up to 33% |
| **From 1 January 2018** | up to 88% | up to 33% |
| **From 1 January 2019** | up to 77% | up to 33% |
| **From 1 January 2020** | up to 66% | up to 22% |

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

**Example** (all figures include GST):

You purchase the policy for $1000 on 1 December 2019. We may receive an initial commission of up to $770 ($1000 x 77%) in the first year and ongoing commissions of $330 per annum ($1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of $500, we may receive an initial commission of up to $330 ($500 x 66%). The ongoing commissions on the additional cover may be up to $165 ($500 x 33%). This is in addition to the ongoing commissions of $330 per annum when the policy was purchased. Total ongoing commissions payable to us may be up to $495 ($1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by the product provider and are not an additional cost to you.

# Privacy Notification

Your personal information will be handled in accordance with our privacy policy, which is located on our website. We will generally collect personal information directly from you. We may collect personal information about you from a third party if we believe you have authorised that third party to provide the information to us.

The main reason we collect, use and/or disclose your personal information, is to provide you with the services that you request. In addition, as a financial service provider, we are obligated to verify your identify and the source of any funds.

We provide financial services under the Australian Financial Services License of Godfrey Pembroke Group Pty Ltd who monitors our compliance with the law and provides us with a range of support services, including the financial planning software we use. As a consequence, Godfrey Pembroke has access to your personal information and may use that information to facilitate the provision of financial services to you and to ensure we are complying with our obligations.

We may also disclose your information to external parties such as your accountant, banks, insurers, and product providers.

In order to keep our costs competitive, our Practice uses specialist business support resources that are located in the following country/countries: Australia only.

The organisation/s we have contracted to support our business have confirmed to us they will adhere to the Australian Privacy Principles when dealing with your personal information. They will not contact you or share your information with any other party unless they have your express approval.

Please refer to our Privacy Policy For more information about how we will handle your personal information, including how to access or correct your personal information.

### Complaints

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal with these complaints, by reading our Privacy Policy (by contacting us) or by referring to the '**Your confidence in our advice**' section of this FSG.

### Further information

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the '**Contact us**' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at **oaic.gov.au**