Implemented Portfolios

Implemented Portfolios Pty Limited
ABN 36 141 881 147 AFSL 345143

Financial Services Guide

1 October 2026

About this Financial Services Guide

This Financial Services Guide (FSG) is intended to inform you of important information relating to the services provided by Implemented Portfolios Pty Limited (Implemented Portfolios, IPL, we, our or us), prior to us providing you with a financial service. It has been composed to comply with the requirements of the Corporations Act 2001 (Cth) (Corporations Act) and the Australian Securities and Investments Commission (ASIC) Corporations (Managed Discretionary Account Services) Instrument 2026/720 (ASIC Instrument 2026/720).

This FSG also comprises of:

- An MDA Contract, which sets out the terms and conditions of any Managed Discretionary Account (MDA) product you decide to obtain from us (MDA Service); and
- An Investment Program which contains details of the investment options available to you including the investment strategy, methodology and risks of each available investment option, the nature and scope of the discretions that will be exercised, the fees and costs and any significant risks relating to the particular investment option. The Investment Program may also be referred to as Investment Programs/Options Booklet and may be provided under the name of your appointed adviser or investment manager.

This FSG contains important information about:

- Who we are and how we can be contacted
- What financial services and financial products we are authorised to provide to you
- What discretion we have
- Who provides personal advice to you and when this must be reviewed
- Detail on the outsourced arrangements in place
- Any potentially significant risks associated with holding a MDA.
- How we (and any other relevant parties) are remunerated
- How you can provide instructions on your portfolio and how corporate actions will be handled
- Conflicts of interest and how they are managed
- Details of our internal and external dispute resolution procedures, along with how you can access them
- Our compensation arrangements
- Fees and costs that may be charge for the MDA Service (full details of fees and costs are detailed in the Investment Program).

It is designed to assist you in deciding whether to use the services offered by Implemented Portfolios and contains information about remuneration payable in relation to our services together with information on what to do if you have a complaint about our services.

Our aim is to make you feel at ease with the services we offer. In doing so we are providing you with this easy-to-understand FSG, designed to help you understand the financial services we can provide and to answer frequently asked questions. If you would like more information or clarification, please don't hesitate to contact your financial adviser.

About Implemented Portfolios

Implemented Portfolios Pty Limited (ABN: 36 141 881 147, AFSL Number: 345143) is part of the Evidentia Group, which is owned by ASX-listed Generation Development Group (ASX: GDG).

Implemented Portfolios holds an Australian Financial Services Licence (AFSL No. 345143) (AFSL) authorising us to provide advice on and deal in the following classes of financial products:

- Deposit and Payment Products
- Government Debentures, Stocks or Bonds
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Managed Discretionary Account (MDA) Services
- Retirement Savings Account Products
- Securities and
- Superannuation

The AFSL permits us to operate an MDA service, provide custodial or depository services and act as an investment manager.

Nature of advice

Implemented Portfolios does not provide personal advice to clients and only provides general product advice in relation to the products and services that we offer. The advice contained in this FSG has been prepared without taking account of your objectives, financial situation or needs. Because of that, you should, before acting on the advice:

- consider the appropriateness of the advice, having regard to your objectives, financial situation and needs;
- obtain all documents set out in the "Documents you will receive and what they contain" section; and
- consider these documents before making any decision about whether to enter the investment program under the MDA service we offer.

Any personal advice provided to you in relation to the MDA Service must be provided by your financial adviser.

What services do Implemented Portfolios offer?

Implemented Portfolios provides an Individually Managed Account (IMA) portfolio service operated on an MDA service basis. The MDA Service is available on several administration and custody platforms and may be 'white labelled' in the name of your appointed financial adviser or investment manager. The extent to which Implemented Portfolios can offer the full MDA portfolio customisation capability depends on the functionality of the service configuration and platform administration option chosen.

The MDA Service requires you to delegate the investment management and trading discretion for the securities and other financial products in your portfolio to us as the MDA Provider. The MDA Service includes the following functions which we provide on your behalf:

- Management of investment portfolios within the parameters of an agreed investment program;
- Execution of transactions as part of the portfolio management process; and
- Election to participate in certain corporate actions with respect to investments held in your account.

If you elect an MDA service configuration directly with IPL, we may also provide portfolio administration and reporting services, incidental custody of investments, and handling of cash (client monies) on your behalf.

IPL may appoint service providers, such as sub-custodians, sub-investment managers and administrators, to perform certain functions of the MDA Service.

You must enter into an MDA Contract by completing an MDA Application Form prior to Implemented Portfolios being able to provide the MDA Service to you. The MDA Contract will contain an Investment Programs/Options Booklet which covers the investment strategy, methodology and risks of each available investment program as well as the fees and costs.

In some cases we may offer investment oversight and governance services to external MDA Providers. Under these arrangements, Implemented Portfolios is not the MDA Provider and our responsibilities are limited to providing oversight, governance and ongoing management and maintenance of the implementation of investment programs to the MDA service offered by the external MDA Provider.

What discretion does Implemented Portfolios have?

Where Implemented Portfolios is the MDA Provider we have absolute discretion with respect to the selection and trading of portfolio assets (including corporate actions) within the parameters set out in the Investment Program and incorporating the advice that you receive from your financial adviser in relation to the Investment Program. These discretions also include appointing and removing sub-investment managers of investment programs (or within investment programs) offered within the MDA Service.

Who is my Financial Adviser?

The financial services that you receive from Implemented Portfolios as part of the MDA Service are recommended by your financial adviser. Implemented Portfolios will not provide personal financial product advice to you.

Your financial adviser must be an AFSL holder or an Authorised Representative of an AFSL holder who has been appointed by you to provide financial product advice. Information about your financial adviser, including the services that they can provide, the costs to you for those services and their remuneration is included in their FSG.

Your financial adviser must provide you with personal financial product advice and a Statement of Advice (SOA) recommending your investment in the MDA Service. To make sure that advice is appropriate for you, your financial adviser must make reasonable enquiries about your current financial situation and future needs. If you do not provide all the requested information or provide information that is inaccurate it could adversely impact on the advice your financial adviser gives to you.

Your financial adviser will provide details of the investment program(s) and in their SOA will tell you about:

- The basis for their recommendation that the investment program is suitable for your needs and circumstances;
- Any fees and commissions received for the financial services provided to you;
- Any associations your financial adviser has with financial product issuers or other parties which may have influenced the advice given to you; and
- Any significant risks associated with their recommended solutions, as well as the risks associated with not acting on the recommended solutions.

If they don't, you should ask them to explain these details to you.

If you are recognised as a wholesale client by satisfying the accepted criteria set out in section 761G of the Corporations Act and apply for the MDA Service on this basis, the disclosure and advice documents that you receive from your financial adviser may differ to those outlined above.

Review required

ASIC requires that a review is conducted at least once every 13 months to determine if the investment program that you have selected within the MDA Service remains suitable considering your personal objectives, needs and relevant personal circumstances. This review will be completed by your financial adviser.

If your circumstances change (or if you become aware that you may have provided inaccurate or incomplete information) you should inform your financial adviser as the Investment Program or the MDA could cease to be appropriate for you as a result of those changes.

Documents you will receive and what they contain

You will receive multiple FSGs, including one from your financial adviser, one from Implemented Portfolios (this one) and one from your administration platform provider (if the MDA Service configuration you have elected is being administered directly by an external regulated platform). Your financial adviser will also provide you with:

- An MDA Contract that outlines the terms and conditions under which the service is provided;
- An Investment Program which contains details of the investment options available to you including the Investment (and/or Sub-Investment) Manager, the investment strategy, methodology and risks of each available investment option, the nature and scope of the discretions that will be exercised, the fees and costs and any significant risks relating to the particular investment option. The Investment Program may also be referred to as Investment Programs/Options Booklet and may be provided under the name of your appointed adviser or investment manager;
- A SOA that has been prepared by your financial adviser specifically for you that will explain the basis upon which they consider the MDA Service is appropriate, the risks associated with the service as well as the specific investment program (portfolio) that is appropriate for you and the risks associated with it;

- An MDA/IMA Application Form, and any additional application documentation if required (for example if you choose an external platform provider to directly administer your MDA portfolio), for the establishment of the MDA.

If you decide to proceed with your financial adviser's recommendations, you will need to complete the Application Form relevant to the MDA Service as appropriate.

Who provides Custody Services?

In some cases Implemented Portfolios as an MDA Provider may provide incidental custodial services to clients. These are delivered via the appointment of a sub-custodian who is contracted to provide custody and depository services to Implemented Portfolios. Implemented Portfolios currently holds sub-custodial arrangements with Citibank N.A., Hong Kong branch (ABN 34 072 814 058) and HUB24 Custodial Services Ltd (ABN 94 073 633 664) for the various MDA Service configurations, though Implemented Portfolios may enter into arrangements with alternative sub-custody providers.

Where Implemented Portfolios have engaged a sub-custodian, the Investments (excluding cash which is held in a separate S981B-compliant account for dealing with client monies) will be held within an omnibus arrangement by the sub-custodian. In this case, Implemented Portfolios will ensure that the relevant requirements under ASIC Instrument 2026/720 relating to additional controls are adhered to.

In other cases, where Implemented Portfolios provides its MDA Service operated via an account administered by an external platform provider, the custody and depository services (and other administration such as portfolio reporting) will be provided by the external regulated platform provider.

In cases where Implemented Portfolios is providing Investment Management services to an external MDA Provider, the custody and depository services will be provided by the relevant administrative platform appointed by that MDA Provider.

What functions of the Service are outsourced?

Implemented Portfolios chooses to outsource to external providers several functions involved in the operation of the various MDA services we offer. When making these selections Implemented Portfolios assesses a peer group of market-leading suppliers who can offer competitive pricing, to drive any eventual decision; and these include consideration of any conflict or potential conflict as outlined in our Conflicts of Interest Policy.

Implemented Portfolios may have the following outsourced arrangements in place:

- External investment managers and/or asset consultants – for the construction and ongoing management of specific asset class exposures and/or investment programs. The Investment Programs/Options Booklet (which may be provided in the name of the external adviser or investment manager) provides the details of the investment managers/asset consultants and the programs that utilise the services of the external investment managers. In some cases the investment manager and/or asset consultant may be a related party to Implemented Portfolios and appropriate conflict of interest policies are maintained to govern these arrangements.
- Sub-custodian – for the provision of custody and depository services.
- Administrator – for the provision of administrative and reporting services.

Implemented Portfolios regularly reviews its service providers against agreed service standards to ensure that the outsourced service providers continually exercise requisite skill and care in completing their responsibilities.

What are the potentially significant risks associated with an MDA?

You should be fully aware that within the parameters described in the Investment Programs Booklet and the SOA from your financial adviser you will not be consulted about portfolio transactions carried out on your behalf. As with all investing there is a risk that trading decisions made by us, or the relevant investment manager of your chosen investment program, on your behalf could result in a capital loss.

Your portfolio may also be subject to the following discretionary investment risks:

Discretion Risk: as with all managed investments, there is a risk that discretionary trading decisions made by the investment manager on your behalf, including decisions on corporate actions, may not be in line with your personal view.

Investment Manager Risk: the investment manager may not anticipate market movements or execute the investment strategy effectively, which may mean the investment objective is not achieved.

Volatility Risk: investment returns that can reasonably be expected from each asset class based on historic returns. During periods of extreme volatility, the market returns for an asset class may vary significantly from the returns achieved by the investment programs / your MDA portfolio.

Counterparty Risk: the assets in your MDA portfolio are beneficially held on your behalf and are ringfenced from both the corporate assets of the MDA Provider and the Sub-custodian.

All investments have a certain degree of risk associated with them. You must be prepared for the risk that you lose money or that your investment does not meet your investment objectives. Generally, investments that have the potential for higher long-term returns may also carry a greater level of short-term risk. Some of the potential risk associated with investing, in addition to those listed above, include:

- Company risk
- Inflation risk
- Market risk
- Legislative risk
- Operational risk
- Diversification risk
- Interest rate risk
- Currency risk
- Liquidity risk

Investing with a professional investment manager leveraging a diversified portfolio of securities may mitigate some of these risks.

The appropriate level of risk for you will depend on a range of factors including your age, investment objectives, investment timeframe, and your level of risk tolerance. Your financial advisor will explain more around the risk of investing and help you understand the specific risks associated with the investment program you select.

How are we paid?

This section contains an explanation of the MDA Service fees (MDA Service Fees) and costs that may be incurred by you when investing in the MDA Service. Full details on the MDA Service Fees and costs applicable to your MDA portfolio can be found in the Investment Programs/Options Booklet. Total fees and costs which are MDA Service Fees and costs, plus any fees charged by your financial adviser (Advice Fees) will also be detailed for you by your financial adviser in their SOA.

MDA Service Fees

The fees you pay to Implemented Portfolios when investing in the MDA Service may include:

- An Administration or MDA fee for the provision and administration of the MDA Service.
- A Portfolio/Investment Management fee for ongoing management of your MDA portfolio.
- Other portfolio administration fees (where an external platform account is not being used, including fees such as Account Keeping fees, Dishonour fees, in-specie transfer fees).
- Brokerage for each listed or unlisted security that is bought or sold (dependent on execution arrangements) and any associated settlement fees.
- Cash holdings fee (where an external platform account is not being used) calculated on the balance of the cash holdings in the cash account.
- Additional service fees may apply where you ask us to do something special for your MDA portfolio such as to transfer securities into or out of the MDA portfolio.

These MDA Service Fees cover the construction, administration and reporting for your portfolio, the investment manager fee (where appropriate), the custodial arrangements (where appropriate), and the relationship with the platform and other service providers (where appropriate). MDA Service Fees may be bundled and represented as a single or combined fee depending on how your appointed adviser, investment manager or any service provider we appoint for the MDA Service, charges their fees. Full details

on the MDA Service Fees applicable to your MDA portfolio can be found in the Investment Programs/Options Booklet.

In some cases Implemented Portfolios may remit a service fee to an external investment manager and/or asset consultant (where applicable) for their portfolio management/construction services and/or other external service suppliers for outsourced arrangements. In some cases the investment manager and/or asset consultant may be a related party to Implemented Portfolios and appropriate conflict of interest policies are maintained to govern these arrangements. These fees do not create additional fees payable by you.

From time-to-time Implemented Portfolios may receive a distribution commission payment on certain placements in initial offers that are taken up within the MDA Service. This does not create an additional fee payable by you.

If you choose an external platform provider to administer your MDA portfolio the relevant administrative, service and custodial fees will apply to your account in line with the fees set out in the relevant platform disclosure documents. These are not fees that are charged by or paid to Implemented Portfolios.

Indirect Costs

Indirect costs form part of the fees and costs of the MDA Service and include fees and expenses from any investment which qualifies as an interposed vehicle (e.g. any underlying assets the MDA Service may invest in as part of your MDA portfolio). These indirect costs include, but are not limited to, items such as ETF expenses (being the costs associated with investing in ETFs, which are deducted from the ETF assets) and the Management Expense Ratio (MER), and other fees and costs associated with investing in Managed Funds, Exchange Traded Products and Listed Investment Companies. These fees are not charged by Implemented Portfolios, but by the product provider of the relevant investment and therefore reduce the value of your investment. Full details of the fees and costs associated with the interposed vehicles within the portfolio can be found in the disclosure documents for each asset.

Advice Fees

You may incur a fee for the advice provided to you by your financial adviser, but this does not represent a fee that we have charged you for investing in the MDA portfolio. This fee may be paid out of the assets of the MDA portfolio where we have been instructed by you to do so. The amount of fees you will pay (if any) to your adviser should be set out in an SOA given to you by your financial adviser. We recommend that you check with your financial adviser if you will be charged a fee for the provision of their advice.

Fee increases

We will give you 30 days' written notice of any increase to direct fees where practicable. This notice may be given by email, letter, by web-based reporting or other electronic form of writing.

Conflicted remuneration

The law restricts payments by us to other AFSL holders that are 'conflicted'. We do not pay commissions to financial advisers. We maintain a Conflicts of Interest Policy which outlines some alternative forms of remuneration that we may, subject to law, pay to or receive from licensees, fund managers or representatives (if any is paid or received at all in relation to the MDA portfolio).

GST

Goods and services tax (GST) is payable for most fees and expenses charged to you. Unless otherwise stated, all references to fees or expenses are expressed as inclusive of GST and net of any reduced input tax credits (RITCs).

How you can provide instructions on your MDA portfolio and how Corporate Actions will be handled

As a client of the MDA Service you can only provide instructions to Implemented Portfolios regarding the service you receive from us via your financial adviser. The FSG from your financial adviser will indicate how you may provide instructions to them about your portfolio.

The decision on how to treat any corporate actions arising from 'model' assets held within the MDA portfolio will be made by the investment manager on your behalf and no communication on voting rights will be passed to you. For corporate actions arising from 'non-model' assets within the MDA portfolio an instruction may be sought from your financial adviser.

A full description of our policy in relation to corporate actions is available upon request.

Potential Conflicts of Interest

We have relationships with various parties whereby we pay or receive fees including investment managers, asset consultants, brokers, banks, financial advisers and custodians.

Implemented Portfolios maintains a Conflicts of Interest Policy in accordance with our legal obligations. Conflicts that have been considered include:

- An association with an investment that is included in the MDA Service, including related entities that may be appointed as sub-investment managers or asset consultants – ownership or common directors/representatives;
- Use of the MDA service generally - cost benefit to the client versus alternatives such as retail funds and IDPS;
- Commissions and soft dollar benefits paid by product providers; and
- Method of charging for services.

Certain conflicts of interest which are prohibited by law will always be avoided. They include:

- Placing an instruction with a broker to buy or sell shares at the 'market price' (i.e. no specific price) and placing an instruction to buy or sell shares in that same entity/entities for personal benefit before the client's order has been transmitted to the broker;
- Insider trading provisions of Corporations Act;
- Hawking provisions of Corporations Act;
- Misleading and Deceptive Conduct provisions of the Australian Securities and Investment Commission 2001 (Cth) (ASIC Act);
- Misleading representations provisions of the ASIC Act;
- Unconscionable Conduct provisions of the ASIC Act; and
- False and Misleading provisions of the ASIC Act

References for those items prohibited by law are:

- Corporations Act, Divisions 7 and 8 of Part 7.8; and
- ASIC Act, sections 12BB – 12DN.

Our Dispute Resolution procedure should you wish to make a Complaint

If you are not satisfied with the services provided to you by Implemented Portfolios, you should take the following steps:

1. Contact your financial adviser and tell them about your complaint.
2. If your financial adviser has not satisfactorily resolved your complaint within 5 Business Days, please contact our Complaints Manager on (02) 9164 9800 or put your complaint in writing and send it to:

   The Complaints Manager
   Implemented Portfolios Pty Limited
   Level 39, 25 Martin Place, Sydney NSW 2000

   We will try to resolve your complaint quickly and fairly.
3. If the complaint cannot be resolved to your satisfaction within 30 days, you have the right to refer the matter to the Australian Financial Complaints Authority (AFCA). AFCA can be contacted on 1800 931 678 (free call), email at info@afca.org.au or you can write to them at:

   Australian Financial Complaints Authority Limited
   GPO Box 3, Melbourne VIC 3001

Compensation Arrangements

Implemented Portfolios has professional indemnity insurance cover in place in respect of financial services provided to our clients. This insurance covers claims in relation to the conduct of our past and present representatives. These arrangements comply with the requirements of section 912B of the Corporations Act.

Record Keeping

Implemented Portfolios has a Document Retention policy in place. In general terms, we will ensure that we retain accurate and comprehensive records of client profiles, transactions and holdings information for a period of seven years in accordance with legal requirements. This will include a copy of information from the statement of advice provided to us as part of your application.

Our Privacy Policy

The privacy of your personal information is important to us. We respect your privacy and detailed information is set out in the Evidentia Group Privacy Policy in relation to how we collect, use and disclose your personal information.

The Evidentia Group Privacy Policy which applies to Implemented Portfolios is available upon request and free of charge by contacting our client services team. It can also be viewed at: https://evidentiagroup.com.

Under the Corporations Act your financial adviser is required to collect sufficient information to identify your needs, objectives and financial circumstances so that they can provide appropriate financial advice.

Your financial adviser will provide your personal information to us to enable us to provide you with the products and services that are appropriate to your needs. We endeavour to retain accurate, complete and up to date personal information about you so your financial adviser will ask you to review and update the information from time to time.

If the information provided to us is incomplete or inaccurate this will impact on your financial adviser's understanding of your requirements and may result in advice that is not appropriate to your needs and circumstances. If this does occur you will need to make your own assessment concerning the appropriateness of your financial adviser's advice.

You may (subject to permitted exceptions) access your information by contacting us. We may charge a fee for providing access.

We may provide personal information to:

- Your financial adviser and their authorised representatives, and their relevant authorising licensee;
- Organisations (who are bound by strict confidentiality) to whom we outsource certain functions such as our sub-custodian, administration provider, our auditors, legal advisers and other professional service providers we engage. In these circumstances, information will only be used for the purposes of providing you the services described in this document;
- Third parties when required to do so by law, e.g. legislation or court order;
- Overseas recipients in accordance with the Privacy Act. Generally, we only do this where we have outsourced a business activity or function to an overseas provider and we reasonably believe that the recipient protects the information in a way that is substantially similar to Australian laws and principles;
- ATO in compliance with Australian Tax requirements and international reporting requirements such as FATCA/CRS.

How you can contact us

Implemented Portfolios Pty Limited

Address: Level 39, 25 Martin Place
Sydney NSW 2000

Telephone: 02 9164 9800

Email: info@implementedportfolios.com.au

Web: www.evidentiagroup.com/implementedportfolios

If you have any further questions about the financial services Implemented Portfolios provides, please contact your financial adviser or our head office.

Please retain this document for your reference and any future dealings with Implemented Portfolios.