FINANCIAL SERVICES GUIDE

27 January 2026 (version v11.20260127)

This Financial Service Guide (FSG) has been authorised for distribution by Hoxton Capital Management (Australia) Pty Ltd (ABN 26 149 470 824), the holder of Australian financial services (AFS) licence number 402217 ('**Hoxton Wealth'),** ('we', 'us', 'our').

This Financial Services Guide (**FSG**) is an important document, to provide you with important information about Hoxton Capital Management (Australia) Pty Ltd (**Hoxton Wealth**), and its Authorised Representatives, who will provide you with financial services described in this document. Our FSG is designed to assist you in making an informed decision about whether to use our financial services, and information relating to:

- the financial services and products we can provide
- how and when we may provide our services
- how we, and our Authorised Representatives, are paid and any other benefits we may receive
- how we protect your private information
- any potential conflicts of interest we may have; and
- who to contact if you have a complaint.

We recommend you read this FSG in full, to obtain a thorough understanding of our offering and how we may work together If you have any questions or uncertainties about any of the information contained in this document, please contact us. It is important you have a clear understanding before we provide you with financial advice.

This Financial Services Guide is issued in two parts and both parts must be read together. Part 1 sets out information about Hoxton Capital Management (Australia) Pty Ltd as the licensee, including the general obligations, services and arrangements that apply to all authorised representatives, including our fees. Part 2 is the Adviser Profile, which contains information specific about your financial adviser, including their education, authorised services, and how to contact them.

INTRODUCING HOXTON WEALTH

Hoxton Wealth is the holder of Australian Financial Services License (AFSL) number 402217, as the authorising Licensee, Hoxton Wealth is ultimately responsible for the conduct and services provided by their Authorised Representatives and employees.

If you need to contact us, you can speak with your adviser. You can also contact Hoxton Wealth by:

Telephone: 02 8324 7435,

Email: admin@hoxtonwealth.com.au

Writing to: Hoxton Wealth, Level 21, 207 Kent Street, Sydney NSW 2000.

The Australian business is part of the Hoxton Wealth group of companies operating around the world. The UK parent, Hoxton Capital Management, founded in 2018 by Chris Ball and Matt Dean has quickly established itself as one of the UK's fastest growing advisory companies. Starting with a team of five, Hoxton Capital Management now has over 300 employees and five international offices. Our team of highly qualified and experienced advisers, offer sound knowledge and transparent advice with a personal approach. Honesty, integrity and a commitment to your interests is clearly demonstrated in the advice we provide.

WE ARE NOT INDEPENDENT

Hoxton Capital Management (Australia) Pty Ltd is neither owned nor controlled by product issuers. However, because we receive commissions for life insurance products, we are not independent.

ADVICE DOCUMENTS

If you receive personal financial advice this will be documented within a Statement of Advice (SOA) or Record of Advice (ROA), confirming our recommendations and their basis, detailing any relevant fees or commissions we will receive and any associations we have that may influence our advice.

If a financial product is recommended to you, you will also be provided with a Product Disclosure Statement (PDS), or an equivalent disclosure document issued by the product provider. The PDS will outline the risks, benefits, features and costs in detail. Please read the PDS before you make any decision about whether to proceed with our recommendation. Should you require an additional copy of any of these advice documents, please let us know and it will be provided to you without additional cost.

OUR SERVICES

Hoxton Wealth is authorised to provide financial advice on, and deal in, the following financial products:

- Deposit and Payment Products
- Government Debentures, Stocks or Bonds
- Life Products, including Investment Life Insurance and Life Risk Insurance products
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Retirement Savings Accounts
- Securities
- Superannuation
- Self-Managed Superannuation Funds

We are overseas pension specialists, and our representatives, typically provide advice on overseas pensions, overseas pension transfers to Australia and Australian superannuation.

Hoxton Wealth is not authorised to provide financial product advice or deal in the following:

- General Insurance Products
- Standard Margin Lending Facilities; and
- Derivatives

In order to provide tax (financial) services to you, an Adviser must be a Qualified Tax Relevant Provider (QTRP). This type of advice is limited to tax matters that arise directly in connection with the financial products and strategies we recommend. Your adviser will consider taxation consequences relevant to the advice provided, however we do not provide comprehensive taxation advice or assess your overall tax position. To understand how our financial advice interacts with your broader tax circumstances, you should seek advice from a registered tax agent or other appropriately qualified professional.

Your Adviser is authorised to provide advice in some or all of these areas and may also be authorised in other specialist advice areas. These are outlined in Part 2 of this FSG, the Adviser Profile.

If your adviser is unavailable or changes, another Authorised Representative of the Licensee may assist you and, where appropriate, continue to provide advice and services to you.

Where your adviser identifies a financial advice need that they are not able to satisfy, they will refer you to someone that may be better able to assist you.

Your adviser has a professional obligation to act in your best interests. If your adviser identifies that you require advice or services that they are not authorised to provide, they will draw your attention to the issue and refer you to another advice professional. Where your adviser reasonably believes that it would not be in your best interests to proceed before you receive advice from the referred adviser, they may pause or decline to provide you with advice or services. Likewise, if acting in your best interests requires your adviser to consider additional matters, products or strategies, they will do so even if this seems to contradict your instructions or preferences

APPROVED PRODUCTS

Our advice is driven by your needs and preferences and based on our consideration of the financial products that might best suit your needs. Although we always recommend appropriate products, we will generally only select products from the Approved Product List (APL) maintained by Hoxton Wealth. The APL is a curated and closely monitored list of the products that Hoxton Wealth has researched, reviewed and considered to be appropriate for our clients. Although we will typically only recommend products that are on our APL, we can recommend other products if no product on the APL is suitable for your needs.

The specific financial services and types of products that your Adviser is authorised to provide are outlined in Part Two of this FSG.

In limited circumstances, we may facilitate a financial product transaction based on your explicit instructions only, and without providing personal advice. You may be required to provide written confirmation that you are requesting service on this basis. Any assistance provided is administrative in nature and should not be relied upon as a recommendation or endorsement.

HOW TO PROVIDE US WITH INSTRUCTIONS

You may specify how you would like to give us instructions, for example, by phone or email using any of the contact details within this FSG. In limited circumstances, and only where specifically agreed, instructions may be accepted over the phone.

HOW WE ARE PAID FOR OUR SERVICES

We may receive fees paid by clients, commissions paid by product provider or other benefits.

All fees and commissions payable for our services are paid to Hoxton Capital Management (Australia) Pty Ltd as the AFS Licensee.

Advisers, including provisional advisers who are authorised representatives of the Licensee, are remunerated under internal remuneration arrangements. These arrangements may include a combination of salary, bonus and a share of fees or commissions.

Depending on the applicable remuneration arrangement, an adviser may be entitled to receive up to 100% of the fees and commissions. These arrangements will be disclosed in your Statement of Advice.

In limited circumstances, where an adviser introduces a client to the business, the adviser may be entitled to receive up to 100% of the fees and commissions generated from that client. Details of any fees, commission or other benefits that we receive as a result of our recommendation to you will be disclosed within your advice document.

Importantly, remuneration is not paid on revenue generated from specific financial product providers. Advisers do not receive any incentives from product providers and Hoxton Wealth does not offer any incentives to advisers that are based on revenue generated from specific product providers.

Advice Fees

Advice fees depend on the complexity of your situation and nature of the advice we provide to you.

Unless otherwise agreed, your initial consultation will be offered at no cost to you and without obligation. During this initial discussion we will gather information about your circumstances and needs and clarify the scope of the advice you require.

If we proceed to provide you with financial advice or services, we will charge a fee for our advice and services. The advice and service fees may be calculated using a fixed dollar amount, a percentage of invested funds, an hourly rate, or a combination of these methods.

All fees will be disclosed in writing and agreed with you before we proceed. Your Statement of Advice will also disclose all fees and costs associated with our advice.

As a guide, advice fees may range from $4,400 and $44,000 (GST inclusive), depending on complexity and the nature of the advice and service. Fees will be explicitly discussed and agreed upon with you in writing, prior to preparing advice.

Ongoing Advice Service

Our ongoing advice service fees are asset-based fees based on the value of the funds under our management. Although it is an asset-based fee, our ongoing service fee will not exceed 1.1% (inc GST) per annum of the total value of your investments. E.g., $500,000 may be charged as 1.1% (GST inclusive) or $5,500 or as an agreed flat fee, for example, $458.33 per month, which equates to the same annual fee.

Our Statement of Advice we will provide you will clearly detail all the fees, commissions or other benefits we may receive and, where possible, will give actual dollar amounts and percentages. If we cannot provide this accurately, we will provide worked examples. All fees and commissions will be inclusive of GST.

Payment of fees

You can choose to pay our fees directly, have our fees deducted from your portfolio or use a combination of both. You can decide what approach suits you best before we provide you with our services.

Commissions from Life Insurance Products

Hoxton Wealth can, and does, receive initial and ongoing commissions from insurance providers. These commission payments are paid to us by the company that issues the product or provides the cover and are included in the product cost. The commission paid to us will be a percentage of the policy cost.

Commission is paid to us over the life of the product, but it declines after the first year as detailed in the following table.

Date a new product is issued	Initial commission (% of annual policy cost or increase inc GST)	Ongoing commission p.a. (% of annual policy cost or increase inc GST)
From 1 January 2020*	0 - 66%	0 - 22%

Different commission arrangements may apply to some policies issued prior to this 1 January 2020. Any commissions payable will be fully disclosed in the relevant advice document. You can find details of how your insurance policy cost is calculated in the relevant PDS and, where we provide you with personal advice, these benefits will be detailed in the advice document.

Referral Fees

In the event we are unable to assist you, or we believe you require advice or services that we or the adviser cannot provide to you, we may refer you to another party or adviser. We will only refer you to another provider if we reasonably believe it is in your best interest. Your information will not be provided to any other party without your explicit consent.

If you have been referred to us or your adviser a referral payment may be made to the referrer.

We may receive a benefit for referring you to third parties for specialist services. These benefits are not paid to your adviser.

Other Fees

Other assistance you may need with transactions outside ongoing advice service may be charged at an hourly rate of $440 per hour.

ASSOCIATIONS OR RELATIONSHIPS

The benefit of being a client of the broader Hoxton Wealth group is the additional services and assistance provided by our related entities. We may receive administrative, technology or support services from related entities within the group, for which payment may be made. These arrangements do not influence the financial advice we provide.

Hoxton Wealth may, from time to time, receive payments or non-monetary benefits from product providers that are solely used to support adviser education and training

Hoxton Wealth maintains an Alternative Remuneration register, that records any alternative forms of payments or benefits over $100 that are received. If you wish to see a copy of this register, please contact us directly.

COMPLAINTS PROCESS

Hoxton Wealth sets out to provide the highest level of service in the industry. We endeavour to always be available, be informative and be transparent.

If, for any reason, you are unhappy with our advice or services, we encourage you to take the following steps:

1) Please contact your financial adviser so they can act immediately. Your adviser will try to resolve any complaint you may have, acknowledging your complaint in writing within 24 hours or 1 day.
2) If your financial adviser does not satisfactorily resolve your complaint within 5 days or you would prefer not to speak to your adviser, you can contact us:

…in writing: Hoxton Capital Management (Australia) Pty Ltd, Complaints Department, Level 21, 207 Kent Street, Sydney NSW 2000

…by email: complaints@hoxtonwealth.com.au

…by telephone: 02 8324 7435

We will acknowledge your complaint within 24 hours (or 1 day) of receipt and our Complaints Manager will investigate and formally respond within 30 days. If your matter is particularly complex, we may need more time, but we'll let you know as soon as we determine that we may need more time. Our response to your complaint will outline and clearly explain our findings, including information that may help you understand our position.

3) If we cannot resolve your complaint to your satisfaction within 30 days, you may contact the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that's free to consumers.

…writing: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3000

…email: info@afca.org.au

…phone: 1800 931 678 (free call)

…website: www.afca.org.au

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. The AFCA website can inform you if a time limit applies and if or when a time limit that applies to your circumstances may expire.

Hoxton Wealth is a member of AFCA, registration number 25911.

PROFESSIONAL INDEMNITY INSURANCE

As required by law, Hoxton Wealth holds professional indemnity insurance that covers Hoxton Wealth and our authorised representatives/employees in respect of our licensed activities. This insurance will continue to provide such coverage for any authorised representative/employee who are no longer authorised representatives or working for Hoxton Wealth at the time of your complaint.

PRIVACY

We are committed to providing professional services, maintaining the trust of our clients, and respecting your private information. We take great care in how we handle and process your information in a secure and professional manner.

We collect personal information on you to help us carry out our duties to you, our product providers, and regulators. We use your information to provide you with products or services, to assess your risk tolerance and determine strategies and recommendations in your best interests and consistent with your financial needs, objectives and personal circumstances. If you do not provide us with complete, accurate and relevant information, we may not be able to provide you with the most appropriate products or services, act on a timely basis or protect against fraud.

We may disclose your personal information to anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties such as a complaints body to whom a complaint relating to a product or service is referred, any party acquiring an interest in our business and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

In order to provide our services to you, we may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Hoxton Wealth is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations.

We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy.

Our privacy policy is available on our website, it covers:

- how you can access the personal information we hold about you and ask for it to be corrected;
- how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and;
- how we collect, hold, use and disclose your personal information in more detail.

We will update our privacy policy from time to time.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

We aspire to high ethical standards and our employees bound by strict confidentiality obligations. Accordingly, we apply organisational and technical measures to ensure appropriate security of the personal data we collect, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

If you have any questions, queries or would like more information/detail about our policies, your private data and rights, please feel free to contact us. You can access your personal data we hold by contacting us.

Privacy Collection Statement

Introduction

This Privacy Collection Statement outlines how Hoxton Capital Management (Australia) Pty Ltd ("we", "us", "our"), an Australian Financial Services Licensee (AFSL), collects, uses, discloses, and manages your personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). This Privacy Collection Notice forms part of our Privacy Policy, and together they form our notice for collecting personal information under Australian Privacy Principle 5.

Collection of Personal Information

We collect personal information directly from you during our interactions and engagements, including through our website, App, application forms, and other communications. This may include your name, contact details, financial information, and other relevant personal data.

Legal Requirement or Authorisation

In some cases, the collection of your personal information is required or authorised by law. For example, under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), we are obliged to collect certain information to verify your identity.

Purpose of Collection

We collect your personal information for the primary purpose of providing you with financial advice and related services. This includes assessing your financial situation, providing tailored financial recommendations, managing your accounts, and complying with our legal and regulatory obligations.

Consequences of Not Collecting Personal Information

If you do not provide the requested personal information, we may be unable to offer you our services or meet our legal obligations. This could affect our ability to provide you with accurate and effective financial advice.

Disclosure of Personal Information

While providing our services to you, your personal information may be provided to external service providers, such as

- Our related entities, agents, and contractors for operational purposes.
- Financial institutions and service providers involved in managing your accounts.
- Regulatory bodies, government agencies, and law enforcement authorities as required by law.
- Professional advisers, such as accountants and lawyers, with your consent.

Overseas Disclosure

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might be stored or accessed in overseas countries, including but not limited to New Zealand, United Kingdom, United Arab Emirates and the United States of America.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, we will take reasonable steps to ensure that overseas providers do not breach the Privacy Act and that any third parties are subject to a similar level of protection or similar obligations that are offered by the Privacy Act. If you do not agree to the transfer of your personal information outside Australia, please contact us.

APP Privacy Policy

For more detailed information on how we handle your personal information, including how you can access and correct your information, or make a complaint, please refer to our APP Privacy Policy available on our website hoxtonwealth.com.au or contact us directly using the details provided above.

Conclusion

We are committed to protecting your privacy and ensuring the security of your personal information. If you have any questions or concerns regarding this Privacy Collection Statement or our privacy practices, please contact us.

FINANCIAL SERVICES GUIDE – PART 2
ADVISER PROFILE

19 October 2026 (version v11.20261019)

This FSG Part 2 contains information specific to your Adviser and must be read together with the FSG Part 1.

WHO IS PROVIDING THE FINANCIAL SERVICE

Your adviser is **Bassel Judeh**.

Bas is an Authorised Representative of Hoxton Capital Management (Australia) Pty Ltd, (Hoxton Wealth), ABN 26 149 470 824, ASIC number 402217, and authorised to provide the financial services in this FSG.

Bas's Authorised Representative number is 1311846.

ABOUT YOUR ADVISER

Bas has been working in financial services in Australia since 2021 and became authorised in October 2024. He is passionate about helping clients build clarity and confidence around their financial future, and focuses on building long-term, trusted relationships.

ADVISER QUALIFICATIONS

Bas's qualifications and memberships include:

- Graduate Diploma of Financial Planning, Deakin University
- Bachelor of Finance, La Trobe University

AUTHORISED PRODUCTS AND SERVICES

Bas is authorised to provide advice and services in respect of:

- Deposit and Payment Products
- Government Debentures, Stocks or Bonds
- Life Products, including Investment Life Insurance and Life Risk Insurance products
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Retirement Savings Accounts
- Securities
- Superannuation
- Self-Managed Superannuation Funds

Bas is a Qualified Tax Relevant Provider (QTRP) and can provide you with tax (financial) advice services.

CONTACT DETAILS

Georgia can be contacted on:

by email:	Bas.Judeh@hoxtonwealth.com.au
by telephone:	02 8324 7435
in writing:	Hoxton Capital Management (Australia) Pty Ltd, Level 21, 207 Kent Street, Sydney NSW 2000