



FINANCIAL SERVICES GUIDE

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Hartleys Limited
ABN 33 104 195 057 AFSL No.230052
Participant of ASX Group
www.hartleys.com.au

Part 1

Purpose of Financial Services Guide

This Financial Services Guide (FSG) is intended to inform you of certain basic matters relating to our relationship, our charges, the type of advice and services we can provide you, and what you can do if you have a complaint about our services.

We provide you this information prior to us providing you with a financial service, to enable you to make an informed choice as to whether you wish to use any of the services described in this FSG. References in this FSG to 'Hartleys', 'we', 'us' or 'our' are references to Hartleys Limited.

This FSG is in two parts

Part 1 contains information about who we are and how we can be contacted, what services and types of financial products we are authorised to provide to you, how we (and any other relevant parties) are remunerated, details of any potential conflicts of interest, and details of our internal and external dispute resolution procedures, along with how you can access them.

Part 2 contains information relating to our Schedule of Fees.

Hartleys may amend the FSG from time to time. As such, we reserve the right to publish any amendments electronically on our website www.hartleys.com.au, however any material change will be posted to all clients notifying them of this.

Statement of Advice

Retail clients who use Hartleys services for the first time and require personal financial product advice will be provided with a Statement of Advice (SoA). This SoA will document the advice, the reasons for our recommendation, and information about fees, commissions and other benefits and associations, which may have influenced us when providing the advice.

Existing clients will also be provided with a SoA when they notify Hartleys that either their personal circumstances, financial goals or investment objectives have changed significantly or such changes are likely to influence any further advice provided by Hartleys.

Further Advice

If you are an existing client and you receive "further advice" from Hartleys and your personal circumstances, financial goals or investment objectives have not changed significantly then Hartleys may rely on the information it may already hold concerning your personal circumstances, financial goals and investment objectives when providing you with further advice. Whilst you will not be provided with a SoA you may request a record of such advice for a period of up to seven years from the date it was provided. You should direct requests for a record of advice to your representative.



Product Disclosure Statement

Where we either make a recommendation that you acquire a particular financial product (other than securities such as listed shares), or offer to issue or arrange the issue of a financial product to you, we will provide you with a **Product Disclosure Statement** (PDS). The PDS contains information about the particular financial product including the features, benefits, fees and risks associated with the particular product, which will enable you to make an informed decision in relation to the acquisition of that financial product.

Who will be providing the financial service to you?

Hartleys will be responsible for providing the financial services to you through its representatives. Hartleys is responsible for the actions of its representatives when providing the services. Hartleys is a Participant of the ASX Group.

In relation to exchange traded option products traded on the ASX Limited, Hartleys uses the services of an executing broker that is a Participant of the ASX Group. Your trades will be held in your name with the executing broker. The executing broker will separately provide services to you in relation to trades entered into on your behalf, which includes arranging clearing and settlement services in relation to your trades through a clearing participant of the relevant market.

How can we be contacted?

Hartleys Limited ABN:	33 104 195 057
Australian Financial Services Licence Number:	AFSL 230052
Location Address:	Level 6, 141 St Georges Terrace Perth WA 6000
Postal Address:	GPO Box 2777 Perth WA 6001
Telephone:	(08) 9268 2888
Facsimile:	(08) 9268 2800
Email:	info@hartleys.com.au
Website:	www.hartleys.com.au

What financial services and products do we offer?

Hartleys is authorised under its AFSL to provide you with the following services:

- Provide financial product advice;
- Deal in a financial product; and
- Custodial/ depository services.

We provide advice and deal in relation to the following types of products:

- Deposit products;
- Derivatives;
- Securities (such as shares);
- Managed investments;
- Managed investment warrants;
- Retirement savings accounts;
- Superannuation;
- Life products; and
- Debentures, stocks or bonds

Hartleys utilizes an approved product list for managed investments and master trusts. This list ensures that recommended products are vetted and have supporting research.

Who does Hartleys act for when Hartleys provides financial services to you?

Generally Hartleys acts for you when it provides financial services to you.

How do you obtain our services?

If you have been provided with a Hartleys Representative, please contact that Representative directly. If you are a new client and do not have a nominated Representative, please contact us on our contact details provided in this FSG.

How may instructions be given?

You may give us instructions in person, by email, by telephone, facsimile or other means as may be mutually agreed. However, you must be aware that unless you speak to your adviser or their assistant directly there is no guarantee that your order will be executed in a timely manner.

Prior to accepting your first instruction, Hartleys will require you to sign an Account Opening Form that contains, amongst other things the terms and conditions on which our relationship will be based.

How are we remunerated for the services we provide?

Generally, there are four ways that we can charge for our services:

- brokerage when you buy or sell securities or derivatives;
- a fee based on the services we provide;
- fees or commissions based on the value of funds in relation to which we provide advice; or
- commissions based on certain financial products.

Information about our remuneration and commissions are set out in **Part 2 of this FSG** for each of our particular services, including when and how remuneration, commissions or other benefits are payable. Some fees that we charge may be tax deductible. You must confirm this with your own professional taxation adviser in relation to your specific situation.

How are our Representatives remunerated?

Our Representatives may be remunerated by two means: salary and / or financial incentives. Financial incentives may be based on a number of factors, including the level of fee, commission or brokerage income earned in relation to the financial services and financial products provided to you.

The level of fees, commission or brokerage earned in relation to financial services and financial products will vary depending upon the financial service or financial product. The level of fees, commissions and brokerage that may be payable to a Representative is detailed in **Part 2 of this FSG**.

Where we provide you with personal advice, the amount of fees, commission and brokerage will be disclosed in the record of personal advice (ie. the SoA or the record of advice in relation to further advice). You will also be provided with specific details in relation to each transaction, financial product or financial service provided to you by way of a Confirmation of Transaction.

Will anyone be paid for referring you to Hartleys?

If a third person has referred you to us, we may pay that person a part of any fees, commissions or brokerage earned by us. Where this occurs, this will be disclosed on a Confirmation of Transaction and provided to you in your SoA. This will not increase the fees, commission or brokerage you pay us.

Where you have been referred to us by a third party that has a vested interest in maintaining an ongoing relationship with you, a referral fee may be paid. Likewise, where we refer you to a third party, that third party may pay a referral fee to us. These types of fees vary according to the nature of the referral, number of referred clients, size of the portfolio or number of transactions. If this type of fee is paid, it will be disclosed in your SoA.

Are there any association or relationships that exist which might influence Hartleys in providing you with the financial services?

Neither Hartleys, nor any of its related bodies corporate have any ownership links with any financial product issuer that could be expected to influence us in the provision of any financial services or financial product.

Will Hartleys provide you advice, which considers your needs, objectives and financial circumstances?

In order for Hartleys to provide you with personal advice, you will need to provide us with details of your objectives, financial situation and needs before we recommend any financial products or services to you. You have the right not to divulge all or some of this information to us, if you do not wish to do so. In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully in the Account Opening Forms and SoA.

Does Hartleys trade as principal?

Occasionally Hartleys may trade on the ASX on its own behalf, that is 'as principal'. This includes transactions by Hartleys affiliates, directors, company secretaries or substantial shareholders, their immediate family, or their respective investment vehicles. With the exclusion of Market Participants and participants or members of a Recognised Stock Exchange, Hartleys will seek your consent prior to entering a matched transaction with you and we will not charge you brokerage on the transaction.

What information do you maintain in my file and can I examine my file?

Under the Anti-Money Laundering and Counter-Terrorism Act 2006 Hartleys is required to know its customers. This will be achieved through customer identification and verification of that identification. We maintain a record of your personal profile, which may include details of your objectives, financial situation and needs. We also maintain records of any recommendations or advice made to you. Additionally, we will also carry out customer due diligence, which will require Hartleys to monitor customer transactions on an ongoing basis. We are committed to implementing and promoting our privacy policy, which will ensure the privacy and security of your personal information. Reasonable steps are taken to preserve the security of collected personal information. Secure passwords, user login requirements or other security procedures are used to protect stored personal information. A copy of our privacy statement is available on our website at "www.hartleys.com.au" or ask your Representative for a copy. If you wish to review your personal information, we ask that you make a request in writing and allow up to fourteen (14) working days for the information to be forwarded. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise you of the likely cost in advance and can help to refine your request if required.

How can you complain about the provision of the financial services to you?

If you have any complaint about the financial service or financial products provided to you, you should take the following steps:

1. Contact the Compliance Manager at Hartleys at GPO Box 2777, Perth WA 6001 and inform them about your complaint in writing. The Compliance Manager will investigate oral complaints made directly or referred by a Representative or Team Leader. These types of complaints would typically involve issues of an administrative nature or where small amounts (under \$100) of compensation are sought. If you have not received a satisfactory response or 45 days have elapsed you may refer the matter to FICS.
2. Hartleys is a member of the Financial Ombudsman Service ("FOS") formerly known as FICS. FOS can be contacted on 1300 780 808 or PO Box 579 Collins Street West, Melbourne VIC 8007. This service is provided to you free of charge.
3. You may choose to refer the matter to the Australian Securities and Investments Commission ("ASIC"). ASIC may be contacted on their freecall Infoline on 1300 300 630.

Professional Indemnity Insurance

Hartleys has Professional Indemnity (PI) Insurance cover which complies with our obligations under our licence and which we believe is adequate having regard to:

- the liabilities which may arise out of our membership of the Financial Ombudsman Service; and
- the nature and size of our financial services business.

This PI insurance also applies to conduct of employees who are no longer employed by Hartleys but were at the time of any relevant conduct.

What should you know about the risks of the financial products or strategies we recommend to you?

We will explain to you any significant risks of financial products and strategies, which we recommend to you. If you are uncertain of any information that we have provided to you, you should not act in relation to the information and you should ask us to explain those risks to you. Investments can decline in value as well as appreciate in value. The measure in this change of value is often referred to as volatility, i.e., the more the value varies over time, the more volatile the assets and therefore the more risk involved in investing in it. Conversely, the less volatile an asset, the less likelihood there is for any significant profit or loss from investing in that asset.

Risk is both a positive and a negative for an investor. There can be dangers in avoiding risk or not assuming enough risk. By increasing risk you can potentially increase investment returns over the long-term but the price you pay will be increased volatility.

Securities and derivatives are generally more volatile than other asset classes, however, the markets for other asset classes are not necessarily as transparent as the stock market in terms of information available to investors, the process for continuously determining and making public the real market value of the particular asset. In general the risks of investing can be categorised in the following manner. Please note that this list is not exhaustive.

Market Risk

This is the risk of loss by reasons of movements in a market sector. These can be caused by any number of factors including political, economic, taxation or legislative. Specific examples include changes in interest rates, political changes, changes in superannuation laws, internal crises or natural disasters. Market risk can be minimised by having a spread of investments across different types of assets.

Global Risk

This is the vulnerability of the company to international events or market factors. These would include movements in exchange rates, changes in trade or tariff policies and changes in the bond market.

Sector Specific Risk

The possibility that a particular investment may under perform the market or its competitors. This may be minimised by detailed research to identify quality investments, reviewing their performance and their place in a portfolio.

Timing Risk

The possibility that you enter the market at a bad time, e.g. just before a share fall. This can be minimised by not investing all of your funds into the market at one time.

Speculative Risk

If your Adviser describes an investment as speculative you should be aware that the investment could rise significantly but also fall by the same degree. You should not invest in speculative investments unless you understand and accept the risks fully and are prepared to accept any resultant loss.

Part 2 – Schedule of Fees

How are Representatives remunerated for services provided?

Representatives are remunerated by way of a commission / brokerage / fee split with Hartleys. The exact split of commissions, brokerage and fees varies based on a number of factors, but is within a range of 35% to 50% of the amount earned by Hartleys. For example.

If the brokerage for Australian securities was:					
Transactional value			Fee (inc GST)		
\$ 0	to	\$ 5,000	2.35%		
\$ 5,001	to	\$15,000	2.1%		
\$15,001	to	\$50,000	1.6%		
		\$50,001 +	Negotiable		
The minimum fee per contract note is \$93.50 (\$85.00 + GST) for each buy and sell transaction.					
Eg. if you buy \$15,000 worth of BHP, then the following maximum fee could apply:					
Transaction Value	\$15,000.00				
Fee (\$15,000 x 2.1%)	\$ 315.00				
Total amount payable	\$15,315.00				
FEE (EXCL GST)	GST PAYABLE	35% SPLIT		50% SPLIT	
		PAID TO HARTLEYS	PAID TO YOUR REPRESENTATIVE	PAID TO HARTLEYS	PAID TO YOUR REPRESENTATIVE
\$85.00	\$8.50	\$55.25	\$29.75	\$42.50	\$42.50
\$286.36	\$28.64	\$186.14	\$100.22	\$143.18	\$143.18

Fees and charges for advising and dealing services

Hartleys is remunerated by way of the brokerage, fees, charges and commissions it charges for each investment made by you. Brokerage charges are levied for each buy and sell transaction executed for you in securities, warrants, exchange traded options and international securities. A Confirmation of Transaction will be issued to you upon completion of each transaction, which will show the total brokerage charged and applicable government taxes.

All other fees detailed below, will be disclosed in your Statement of Advice (SoA)

Research is generally provided to you free of charge. In certain circumstances however, a fee may be charged. If we do charge a fee this will be disclosed in a SoA.

Trading in listed securities and warrants

Transaction Value	Fee (inc GST)
\$0 to \$5,000	2.35%
\$5,001 to \$15,000	2.10%
\$15,001 to \$50,000	1.60%
\$50,001 plus	Negotiable

A minimum fee of \$93.50 is charged for each buy and sell transaction (inc GST).

Trading in listed Australian Exchange Traded Options

Transaction Value	Fee (inc GST)
\$0 to \$5,000	2.5%
\$5,001 to \$15,000	2.0%
\$15,001 to \$50,000	1.50%
\$50,001 plus	Negotiable

A minimum fee of \$93.50 is charged for each buy and sell transaction (inc GST).

International Listed Securities

Transactions in international securities are typically subject to a fee of 2% with a minimum fee of \$220 being charged for each buy and sell transaction (inc GST) plus the commission charged by the agent who undertakes the transaction. This cost is built into the price quoted for the international security by the agent and will vary depending on the size of the transaction. Certain transactions will be subject to a custodian fee dependent on the exchange where the transaction occurs. This will be confirmed with you prior to accepting an order in these securities.

Underwriting and Placements

We may receive fees from an issuing company when we lodge your successful application for investments in new issues. Details of the fee are provided at the time we send you the relevant prospectus or offer document and your Statement of Advice (**SoA**) but typically range from 1% to 7% of the capital raised. We may also underwrite these capital raisings. Your Representative may receive a fee for arranging this investment for you, this fee is typically 0.5% to 5% of the total fee received by us.

Off Market Securities Transfers

Each buy and sell transaction may be charged at the rate of \$33 (inc GST).

Portfolio Management Fees

Account establishment and management fees are payable on these types of services. Should this type of service be recommended to you all relevant fees will be disclosed in your SoA.

Managed Investments

These schemes typically charge establishment and ongoing management fees, and may also charge you for ongoing compliance costs. These rates will be disclosed to you in a Product Disclosure Statement and any SoA that we provide to you at the time you make the investment.

Margin Lending

Margin Lending institutions charge varying interest rates, these will be disclosed in your SoA.

Cash Management Accounts

Cash management companies and / or banks charge a variety of fees and varying rates of interest, which should be disclosed in any Product Disclosure Statement or brochure provided to you.

Fixed Interest

Rates vary for these products, the exact rate will be disclosed in your SoA.

Life Insurance Products

There is a broad range of commission rates in relation to these products. Rates will be disclosed in your SoA.

Financial Plan Preparation

We will charge you a minimum of \$550 (inc GST) for the preparation of any Financial Plan. This fee may be increased if the Financial Plan is particularly complex. We will discuss this with you at the time of preparation of the plan and disclose the exact fee in your SoA. This amount is payable on completion of the Financial Plan and before any transaction occurs in relation to the implementation of the Financial Plan.

Remuneration Received From Other Entities

We receive remuneration from financial product issuers and financial product providers.

The table below highlights payments we may receive based on the value of your investment. Exact details of the remuneration we receive will be provided in your SoA.

Product	Commission / Rebate which we may receive from a product issuer or provider
Managed Funds	0% - 5.5% of the value of the investment (upfront commission) 0.2% - 1.1% per annum of the value of your investment (ongoing trail fee)
Margin Lending	0.25% to 0.5% of the margin facility (ongoing trail fee)
Warrants	0% - 5% of the value of the transaction issued on the primary market (incentive payment)
Cash Management Accounts	Approximately 0.25% of the funds in the account (ongoing trail fee)
Fixed Interest	Approximately 0.25% of the investment (upfront commission)
Life Insurance Products	0%-25% (upfront commission) 0%-25% (ongoing trail fee)

Certain financial product issuers may offer incentives such as, increased commissions and volume bonuses, depending on the volume of placements in their products. As a result we may receive a commission or payment from these companies as result of your investment in one of these products. Any such payment will be disclosed in your SoA.

Your Representative may also receive benefits from product issuers such as, complimentary or subsidised attendance at seminars or conferences, assistance with marketing material and other rewards such as gift vouchers, complimentary tickets to events or entrance in a competition, as a result of your investment in a financial product. Any such payment or opportunity will be disclosed in your SoA.