

STAGE 1 DISCLOSURE

FAP Name: Home Loan Advocate NZ Limited FSP: 769818



The purpose of the regulation is to help consumers find a financial advice provider that meets their needs.

A website or internet site maintained by a FAP would be the most common place where publicly available information would be found by consumers.

The information must be prominently displayed on the home page or somewhere easily found on the site. It could also be via a link from the home page.

Ensure that the public can easily access this information at all reasonable times.

This information is required to be given upon request to a client/consumer at no cost.

This could be done via a marketing document or PDF to cover all the required information.

How to use this information

This guide has been put together to assist you with preparing your Stage 1 disclosure.

Use this as a checklist for your website and written disclosure document.

Please edit the 'template' pages to fit your business and all the relevant information required.

Disclaimer

No liability is accepted for anyone who uses this information without guidance or sign-off by our compliance team. This is a guidance-only document and not legal advice.

Example of disclosure for 'publicly available information'.

(This should appear on your website or be made available in a document)

Important information about our business (suggested heading)

Home Loan Advocate NZ Limited holds a Financial Advice Provider licence issued by the FMA to provide financial advice services.

Home Loan Advocate NZ Limited

Financial Services Provider Number is FSP769818

(User Note: If you are an authorised body, include the details of the licensed FAP and the authorised body applicable to your FAP structure.)

Our office contact details:

Address: 1/95, Wheturangi Road, Greenlane, Auckland 1051 Phone: 02102860002 Email: malini@homeloanadvocate.co.nz Website: <http://www.homeloanadvocate.co.nz/>

Nature and Scope of financial advice services

Our Services	Investments strategies (strategic asset allocation and investing) Debt management (including borrowing for personal and investment purposes)
Products we can provide financial advice about	Loans including mortgages, reverse mortgages
Product providers we might recommend	Main Banks: ANZ, ASB, BNZ, Westpac, Kiwi Bank, TSB, SBS, Cooperative Bank, China Construction, AIA Go Home Loans Bank, Second Tier Lenders: ASAP Finance, Avanti, Basecorp, CMFL, Cressida Capital, DBR, First Mortgage Trust, Funding Partners, Heartland Bank, Liberty, Pepper Money, Plus Finance, Prospa, Finbase, Pallas Capital and Southern Cross Partners. Business Lending: Bizcorp, Prospa, Spiers Finance

Our fees

The actual fee charged to you will depend on the nature and scope of the advice or service we provide. We will discuss and agree on the actual fees with you before we proceed and explain how they are payable.

The following section outlines the types of fees that may apply:

- **Charges** - payments you may be required to make

We may charge you a one-off fee in the following situations:

(1) No commission: If you request that we provide Services in relation to a product or service and we do not receive a commission. Any such fee would be agreed and authorised by you in writing before we complete the Services. This may arise in the rare event that you request that we provide Services in relation to either a product that is offered by a provider that we do not hold an accreditation with, or a product that is outside our usual arrangements with our Product Providers.

(2) Repayment of commission: (a) If a product or service provider requires that we repay commission within 36 months of settlement of your mortgage. Any such fee would be payable by the Client. This may arise in very limited circumstances, such as when you have repaid a loan in full or in part. (b) If Client terminates the application at any point in time, the adviser could charge a fee calculated based on a rate of NZ\$300 (plus GST) per hour of the Adviser's time spent providing Services to you in connection with the applicable mortgage.

- A set dollar amount; OR
- a percentage-based fee.
- Our agreed advice and service fees may include charges for:
 - Initial advice and ongoing advice; OR
 - annual advice and services.

Other costs

Where other costs are incurred in the process of providing our advice and services to you, you will be liable for these costs.

However, we will agree on all additional costs with you prior to incurring them; OR we don't charge our clients fees, expenses or anything else directly for the financial advice we provide.

Commissions

For services in relation to insurance/ investments/ loan products, commissions may be paid by the product provider as follows:

Initial Commission	I may receive commissions at settlement from the relevant lender if you choose to take out a mortgage following my advice. The commissions are between 55% and 90% of the initial mortgage balance or amount funded
Ongoing Commission	I may/will also receive 0.15% to 0.20% of the mortgage balance on each anniversary.

Conflicts of interest or other incentives

(User note: add your known conflicts or incentives here if any)

We are here for our clients and to advise you as best we can. Your interests are our priority, although we do have business relationships with product providers also.

Our advice process ensures recommendations are based on your financial situation, objectives and needs. We research suitable lenders and products before making any recommendation.

We also complete annual training on managing conflicts of interest and maintain a conflict of interest register.

We may receive referral commissions of between **0% and 30%** of the initial commission received when referring clients to an Insurance Adviser.

HLA (Home Loan Advocate) is subject to annual audits and compliance reviews to ensure we continue to meet our professional obligations.

How we manage any conflicts of interest

To ensure our advisers prioritise our clients' interests:

- We follow an advice process that ensures our recommendations are made appropriately, based on clients' goals and circumstances.
- All our advisers undergo annual training about how to manage conflicts of interest.
- We maintain registers of conflicts of interest and the gifts and incentives we receive. These registers are monitored regularly, and additional training is provided as required.
- We undertake an annual independent Compliance Assurance Review.

Our duties and obligations to you

We are bound by the duties of the Financial Markets Conduct Act (431I, 431K, 431L and 431M) to:

- Meet the standards of competence, knowledge, and skill set out in the Code of Conduct
- Give priority to the clients' interest, and
- Exercise care, diligence and skill, and

- Meet the standards of ethical behavior, conduct, and client care set out in the Code of Conduct.

Our Internal complaints process

If you have a problem, concern, or complaint about any part of our advice or service, please tell us so that we can try to fix the problem.

Our internal complaints manager is **Malini Sivanthan**, who can be reached via email at **malini@homeloanadvocate.co.nz** or 02102860002. Malini Sivanthan will reply to you within 24 hours.

Our internal complaints handling process is as follows:

1. Requesting your complaint in writing
2. Acknowledging the receipt of your complaint within 2 working days of receiving it.
3. Investigating your concerns by speaking with all the involved parties and reviewing all the documentation we hold on the file.
4. Providing a formal written response within 28 days of acknowledging your concern.

Our external complaints process

If we cannot agree on how to fix the issue, or if you decide not to use the internal complaints scheme, you can contact our external disputes resolution scheme: **Financial services complaints limited**. This service will cost you nothing and will help us resolve any complaints.

You can contact **FSCL** at:

Address: Level 4, 101 Lambton Quay, Wellington 6011

Phone number: 0800 347 257

Email address: complaints@fscl.org.nz