



# Financial Services Guide – Part 1

Version number 25.0, 1 November 2025

This Financial Services Guide (FSG) has been authorised for distribution by Paragem Pty Ltd (ABN 16 108 571 875), the holder of Australian financial services (AFS) licence no. 297276 ('Paragem'). Paragem is the AFS Licensee that authorises your Paragem financial adviser ('Adviser') and their firm ('we', 'us', 'our') to provide financial services.

## The purpose of this FSG

This document provides information to help you decide whether to use the financial services we are authorised to provide. It includes details about the financial services and products we are authorised to offer you, the types of documents you may receive, any conflicts of interest we may have and how we, Paragem, and related parties are paid for the services provided, and our complaint handling process and options available if you are dissatisfied with our services.

This FSG is provided in two parts and both parts must be read together. Part One contains information about Paragem and the general obligations and arrangements that apply to all authorised representatives. Part Two is the Adviser Profile, which outlines information specific to your Adviser and their firm, including services offered and applicable fees.

## Contacting Paragem

If you need to contact us, you can speak with your Adviser. You can also contact Paragem using the following details:

Writing:	Paragem Pty Ltd GPO Box 1453 Sydney NSW 2001
Phone:	(02) 8218 8778
Email:	info@count.au

### Not independent

We acknowledge that we are not independent, impartial, or unbiased. In general, we provide personal advice that aligns with the Licensee's Approved Product List (APL), which may include financial products and services associated with the Licensee. We may receive commissions for recommending life insurance products and non-monetary benefits such as training and educational seminars from product providers.

## About Paragem

Paragem is a subsidiary of Count Limited ABN 111 26 990 832. Paragem provides client engagement services, training, licensing, compliance, investments advice and support services to us.

## **About Count Limited**

Count Limited is an Australian public company listed on the Australian Stock Exchange (ASX:CUP). Count Limited operates a network of professional accounting and financial advice firms. Count Limited also operates a services segment that specialises in the delivery of education and expertise to accountants and advisers.

## **Other relationships which might influence Paragem in providing financial advice services**

### **Hub24 Limited**

HUB24 Limited is an ASX listed provider of investment administration platform and technology services and holds a material shareholding in Count Limited.

The Hub24 platform is included on the Paragem Approved Product List (APL) and is available for use by us where appropriate. We are obligated to act in our clients' best interests at all times and will only recommend the use of the Hub24 platform if it is suitable for your needs.

We continue to use a range of other platforms to implement investment advice, and you are welcome to request an alternative platform if you prefer. Importantly, we are not subject to any incentives, sales targets, or under any obligation to recommend the Hub24 platform.

### **CARE Managed Portfolios**

DWA Managed Accounts Pty Ltd (AFS licence no. 264125) (DWA) is a wholly owned subsidiary of Count Limited. DWA is the investment manager for each of the CARE Managed Portfolios. DWA has appointed an investment committee that is responsible for implementing the investment philosophy, investment strategy and investment process for the CARE Managed Portfolios and receives fees for the provision of these services.

These fees, where applicable, will be disclosed in your Statement of Advice (SoA).

No part of this fee is paid to Paragem.

### **Philo Capital Advisers – Managed Discretionary Account (MDA) Service**

Your adviser may recommend the Managed Discretionary Account (MDA) service provided by Philo Capital Advisers Pty Ltd (Philo) (ABN 70 119 185 974, AFSL 301808). More information about Philo is available at [www.philocapital.com.au](http://www.philocapital.com.au).

If you use this service, Philo will be responsible for managing your investment portfolio in line with an agreed Investment Program. This program is based on your financial objectives and strategy, which your adviser will help you establish. Philo, or a portfolio manager appointed by them, will make and implement investment decisions to keep your portfolio aligned with your agreed strategy.

Your adviser does not operate the MDA. Their role is to provide you with personal advice and recommend the service if it is appropriate for your needs. Philo is responsible for the day-to-day management of your investments, while a platform provides custody and administration services.

Fees for the service are paid from your account and include an MDA portfolio management fee. Your adviser may also receive advice fees as agreed with you. In addition, Paragem may receive a fee of 0.05% - 0.15% (excluding GST) from Philo in connection with the referral. All fees and payments will be clearly disclosed in your Statement of Advice (SoA). You should carefully read the SoA, MDA Contract and the Investment Program before deciding to proceed.

### **Safeguards to manage conflicts of interest**

Paragem has adopted safeguards to manage conflicts of interest that may arise wholly or partially in relation to the activities that we undertake. These may include:

- providing full disclosure of the conflict of interest, potential conflict of interest, or perceived conflict of interest to you,
- referring you to another adviser to provide advice to you, or
- declining to provide services or withdrawing the services provided to you.

We consider these safeguards to be a robust and effective approach to managing and preventing conflicts of interest. If we detect a conflict of interest, we will act as an impartial advisor would in your interests.

## Documents you may receive

Documents may be provided electronically to your nominated email address, unless agreed otherwise. The following documents may be received by you when your Adviser provides financial services to you:

### Statement of Advice (SoA)

If your Adviser provides personal advice tailored to your circumstances and needs, you will receive a SoA. This document outlines the advice provided, the reasons for the advice, and any remuneration payable by you and/or received by us or Paragem. The information contained in the SoA is designed to help you make an informed decision about whether to act on the advice.

### Record of Advice (RoA)

In certain circumstances, if you have previously been issued with a SoA, your Adviser may provide further advice without the need for another SoA. In these cases, a Record of Advice (RoA) will be prepared. Additionally, where advice is provided on a small investment balance, a RoA may also be issued. The RoA will outline the advice, the reasons for the advice, and details of any remuneration payable by you and/or received by us or Paragem. Your Adviser may provide you with a copy of the RoA.

### Product Disclosure Document (PDS)

You will receive a PDS or a link to the website where you can locate the PDS if your Adviser recommends a financial product or offers to arrange the issue of a financial product at your request. The PDS contains information about a financial product's features, fees, benefits and risks.

## Services and products we offer

Having access to a comprehensive range of products and services helps ensure your Adviser can provide a tailored financial solution just for you.

### Advice services we provide

Under Paragem's AFS licence, we are permitted to provide financial advice and services across a wide range of financial products. These include:

- Deposit and payment products including basic deposit and non-basic deposit 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 account products
- Securities
- Superannuation, and
- Standard margin lending facility

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 Two of this FSG.

### Approved products

Authorised representatives of Paragem are generally restricted to recommending products that appear on Paragem's APL. These products have been assessed through a robust due diligence and approval process managed by Count Limited's specialist product research team, with the support of independent research providers.

Paragem may use Lonsec Research as a primary research provider in constructing the APL. Lonsec Research is a wholly owned subsidiary of Lonsec Holdings Pty Ltd (ABN 41 151 235 406). Another subsidiary of Lonsec Holdings,

Lonsec Investment Solutions Pty Ltd (ABN 95 608 837 583), manages portfolios that may also be included on the APL.

Paragem has also established a partnership program with a number of financial product issuers. While these issuers may have products included on the APL, any financial benefits received through the program are strictly used to fund education initiatives for Paragem representatives and do not influence product selection.

While other financial products may also be suitable to your needs, your Adviser will generally only recommend products listed on the Paragem APL. If, based on your objectives, financial situation and needs, a product outside of the APL is considered appropriate, it must still meet Paragem's selection criteria and approval requirements before being recommended.

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

### **Non-advised transactions**

In limited circumstances, we can arrange financial product transactions for you on your instruction without providing personal advice. In some cases, you may be asked to confirm your instructions in writing and sign an acknowledgment form to confirm that you are proceeding without advice. Any assistance we provide to complete your transaction should not be taken as a recommendation or endorsement of the product or transaction.

### **Services Paragem is not responsible for**

Paragem is only responsible for the financial services or products provided by your Adviser in their capacity as an authorised representative of Paragem. This does not include any other services your Adviser may provide in another capacity, such as acting as an accountant, tax agent or in another professional role, such as:

- Taxation advice and services (e.g. preparing and lodging tax returns).
- Accounting and audit services
- Self-Managed Super Fund compliance and administration services
- Advice on specific credit products (excluding margin lending)
- Business or legal advisory services
- Advice on unlisted or private companies and investments, private development funds, franchises, high yield debentures, direct property, property syndicates, mortgage schemes, derivatives, general insurance or direct international share holdings
- Any other services not provided under Paragem's authorisation

It is important that you understand which services are being provided under Paragem's licence and who is responsible for them. If you are unsure, please speak with your Adviser or contact Paragem for clarification.

In order to provide tax (financial) services to you an Adviser must be a Qualified Tax Relevant Provider (QTRP). Based on the information collected from you, your Adviser will consider the tax consequences that relate directly to the financial advice being provided, however, this financial advice will not include an assessment of your overall tax position. To determine how your Adviser's financial advice fits with your overall tax position, you should seek separate tax advice about liabilities, obligations or entitlements that arise, or could arise, under taxation law.

### **Instructing us**

You may provide instructions in writing—by post or email—as agreed with your Adviser. In limited circumstances, and only where specifically agreed, instructions may be accepted over the phone.

### **Remuneration and fees**

All advice fees, including non-advised fees, and commissions are paid directly to Paragem as the licensee. Paragem may retain a percentage, and the remainder, that is attributable to the financial services we provide, is passed on to us.

If the fees, commissions or benefits cannot be determined at the commencement of our services, we will describe the manner by which they are calculated and provide you with an estimate of the applicable remuneration.

## **Financial planning advice fees**

The fees or other costs associated with the services we offer and products we recommend depend on the complexity of your situation and the nature of the advice provided.

Your Adviser will discuss and determine the fees with you before providing any advice or services. They will clarify the method for calculating costs and provide you the actual costs in an agreement before starting any work that you will be charged for. You can ask for more information about the fees and the remuneration we may receive.

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.

Where we are aware that you have used borrowed funds to invest, including where we recommend that you borrow to invest, we will not charge you percentage-based fees on the borrowed amount.

Our financial planning advice fees generally include charges for providing you with initial advice, ongoing advice and services, or other transaction-related fees. You may choose to pay these fees directly or from an eligible financial product which you hold, or which we recommend.

Please refer to Part Two of this FSG for further details on the fees that we charge.

## **Insurance commission payments**

When we advise on an insurance policy that you hold, or we recommend, we may receive initial and ongoing commission payments from the product issuer.

An initial commission is a one-off payment made by the product issuer when you first take out a financial product. An ongoing commission may also be paid by the product issuer each year from the second year onward, for as long as you hold the policy. These amounts are not paid directly by you but are built into the cost of the product. We only receive commission where we are entitled to do so under existing arrangements with the product issuer.

If you are charged a financial planning advice fee, we may rebate some or all of the above commission to you.

## **Detailed insurance commission rates**

Initial commissions: Up to 66% of the first year's premium for new policies implemented from 1 January 2020. We may receive commissions on increases or additions to existing policies of up to 66%.

Ongoing commissions: Up to 33% of the insurance premium each following year.

For example: On insurance policies implemented from 1 January 2020, if your insurance premium was \$1,000, we would receive an initial commission of up to \$660. We would receive an ongoing commission of up to \$330 pa.

## **Referral fees**

If you have been referred to your Adviser or to us by a third party, a referral payment may be made to the referrer by us, Count Limited or Paragem. Similarly, we, Count Limited or Paragem may receive a benefit for referring you to third parties for specialist services. These benefits are not passed on to your Adviser.

Class Super is Paragem's preferred third-party service provider of software to assist in the administration of Self-Managed Super Funds. In situations where you purchase this software Count Limited may receive up to 17.5% of the annual software licence fee.

If applicable, further details of referral agreements will be disclosed in Part Two of this FSG or in your SoA.

## **Fee rebate or waiver**

Paragem, your Adviser and/or we may also receive fee waivers, fee subsidies and/or fee reimbursements. These fees relate to support services provided by Paragem to its authorised representatives and may cover expenses such as annual membership fees, software and data service fees, paraplanning fees, as well as travel and accommodation costs related to conferences and training events.

## Professional Development Sponsorship

Count Limited may receive sponsorship payments from product providers which are in no way linked to volume of sales. These sponsorship arrangements help Count Limited to offset the organisational and running costs of providing education and training services to Paragem's authorised representatives.

## What else should you understand?

### How we handle your personal information

We are committed to ensuring the privacy and security of your personal information. As part of our continuing commitment to client service and maintenance of client confidentiality, we have adopted the principles set out in the Privacy Act 1988. For further details you can refer to Count's Privacy Policy, available at: [www.count.au/privacy](http://www.count.au/privacy)

As a financial service provider, we have obligations under the Anti-Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that your Adviser may ask you to present identification documents such as your passport or driver's license and may also retain copies of this information. They cannot provide you with services if you are unwilling to provide this information.

Some of our financial advisers may enter their own outsourcing arrangements with providers located in countries other than those detailed in our Privacy Policy. Details of the countries we disclose to you may change from time to time. Those arrangements will be disclosed separately by the financial adviser to you.

We may use artificial intelligence (AI) tools to assist in providing services to you. These tools are used responsibly to support quality and efficiency, and you will always be asked for your permission before any conversation is recorded.

If you wish to review your personal information held by us, please contact your Adviser directly, or Paragem by emailing [info@count.au](mailto:info@count.au).

### What to do if you have a complaint

We are committed to resolving your concerns. If you are not fully satisfied with any part of the service or advice you have received, for whatever reason, you should take the following steps:

#### Step 1: Contact your Adviser

You should contact your Adviser in the first instance and discuss your concerns with them. Most complaints can be resolved quickly and fairly at this stage.

#### Step 2: Contact the Paragem Complaints Manager

If your Adviser cannot resolve your complaint, or you wish to contact Paragem directly, an internal process is available for reviewing your concerns impartially.

Your complaint will be escalated to the Paragem Complaints Manager, who will aim to resolve it quickly and fairly. They will communicate a proposed solution to you and attempt to resolve the complaint within 30 days of receipt. You will be informed if more time is needed to finalise the matter.

Writing:	Paragem Complaints Manager GPO Box 1453 Sydney NSW 2001
Phone:	(02) 8218 8778
Email:	<a href="mailto:reportcomplaints@count.au">reportcomplaints@count.au</a>

### Step 3: Contact the Australian Financial Complaints Authority (AFCA)

If you remain dissatisfied with the outcome provided by our, or Paragem's internal complaints processes, or if you have a complaint that is not satisfactorily resolved within 30 days, you are entitled to refer your complaint to the Australian Financial Complaints Authority (AFCA). AFCA is an external, independent body offering free and accessible dispute resolution services to individuals who have been unable to satisfactorily resolve their complaint.

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

The AFCA contact details are:

Writing:	Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
Online:	<a href="http://www.afca.org.au">www.afca.org.au</a>
Phone:	1800 931 678 (free call)
Email:	<a href="mailto:info@afca.org.au">info@afca.org.au</a>

Any issue about your personal information, you can contact the OAIC:

Writing:	The Office of the Australian Information Commissioner GPO Box 5218 SYDNEY NSW 2001
Online:	<a href="http://www.oaic.gov.au">www.oaic.gov.au</a>
Phone:	1300 363 992 (free call)
Email:	<a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>

You may also contact the Australian Securities & Investments Commission (ASIC) on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights.

### **Professional indemnity insurance**

Paragem has professional indemnity insurance cover in place and these arrangements comply with the requirements for compensation under the Corporations Act.

Paragem's professional indemnity insurance is subject to terms and exclusions and generally covers claims arising from the actions of our current and former employees or authorised representatives whilst they acted on Paragem's behalf.



## Financial Services Guide – Part 2

Version number 25.0, 1 November 2025

This FSG Part 2 contains information specific to your Adviser and their firm and should be read together with the FSG Part 1, Version Number 25.0, which contains information about the AFS licensee and their general obligations and arrangements. Paragem Pty Ltd (Paragem'), has authorised your adviser to distribute this FSG.

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### The financial services provider

Your Adviser – Reuben Zelwer, is authorised to provide financial services as an authorised representative of Paragem AFS licence no. 297279, ABN 16 108 571 875, as described in this FSG through Adapt Wealth Management Pty Ltd ACN 149 447 807 as Trustee for the K and R Zelwer Family Trust ABN 76 821 231 362. trading as Adapt Wealth Management Pty Ltd, ABN 34 149 447 807 ASIC ID number 408772.

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### Referral arrangements

Adapt Wealth Management Pty Ltd may have referral arrangements with other professional service providers. If a client is referred to us, we may pay the referrer a fee or other benefit. We will record the details of any referral fees in the Statement of Advice we prepare for you. If we refer a client to another service provider they may pay us a referrer fee. We will only refer you to third party professionals, where we believe it is in your best interests to do so. All fees and commissions are paid to Adapt Wealth Management Pty Ltd.

Referral partner	Description of referrer	Payment Structure
Steadfast Life	Specialist Life Insurance Adviser	We receive 27.5% (GST inclusive) of any upfront and ongoing (trail) commissions paid in relation to referrals we make

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Please refer to FSG Part 1, for further information on other relationships that might influence Paragem in providing financial advice services, we will also disclose any associations or conflicts in the Statement of Advice that we prepare for you..

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### Fees

These fees should be considered a guide only. We will discuss your individual needs and agree our fees with you before we provide advice. The actual agreed fees will depend on the complexity of your circumstances, goals and needs and the scope of advice we provide. Please note that fees may be higher than those outlined here if mutually agreed upon. The indicative fees we charge are set out below:

<b>Advice Preparation and Statement of Advice fees:</b>	The fee for the preparation of our advice may range between \$3,850 to \$11,000.
<b>Implementation Fees</b>	The fee for the implementation of our advice may range between \$2,200 to \$8,800.
<b>Ongoing &amp; Fixed Term Service Fees:</b>	<p>These are the fees you pay when you agree to receive our ongoing or fixed term advice. Our services will be agreed with you in a Client Service Agreement.</p> <ul style="list-style-type: none"> <li>• <b>An annual fixed fee</b> between \$3,300 and \$36,000 per annum, based on complexity of your situation, including the number of entities and strategies involved.</li> <li>• <b>Percentage of funds under advice</b> between 0.22% and 0.88% (GST inclusive) of the value of your portfolio. For example, if the value of funds under management is \$500,000 and a rate of 0.88% applies, the annual fee will be \$4,400 per annum. This fee structure will not apply to funds invested using borrowed funds.</li> <li>• <b>Hourly fee.</b> In limited circumstances, you may pay for our services at an hourly rate of \$385 (including GST) for a financial planner and between \$110 and \$198 (including GST) for support staff billed in a minimum of 1 hour increments.</li> </ul>
<b>Non-advised Transaction Fees:</b>	If we assist you on an execution only basis (ie where you have been offered and declined advice), a fee of up to \$5,500 or \$385 per hour will be applicable.

Note: All fees are inclusive of GST.

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## Our contact details

Reuben Zelwer

Phone: 03 9211 0175

Adapt Wealth Management

Website: <https://adaptwealth.com.au>

Email: [advice@adaptwealth.com.au](mailto:advice@adaptwealth.com.au)

Office Address: 2/91 Station Street, Malvern VIC 3144

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# Our Privacy Collection Statement

We collect personal information about you (and, if applicable, anyone acting on your behalf) to help us provide financial services that are suited to your needs, to manage our relationship with you, and to meet our legal obligations under the Privacy Act 1988 and the Corporations Act 2001.

This statement forms part of our broader Privacy Policy, and together they make up our formal notice under Australian Privacy Principle 5.

## Why we collect your information

We need certain information to understand your financial situation and provide appropriate advice or services. The specific information we collect will depend on who you are and the nature of the services you need.

If you choose not to share some details, or if the information is incomplete or inaccurate, it may limit our ability to provide advice or services to you, or we may not be able to proceed at all. It could also mean that the advice you receive is less tailored to your situation. In some cases, we may need to end our relationship if we cannot properly meet your needs.

## Who we may share your information with

To deliver our services, we may need to share your information with:

- Product and platform providers
- External service providers (e.g. paraplanners, IT providers)
- Other professionals you've authorised us to work with (e.g. your accountant or tax adviser)

Adapt Wealth Management may engage the services of external services providers both here and overseas who supply administrative, financial or other services to assist us to provide financial and services to you.

## Sharing information overseas

Some service providers we use may be located overseas or have operations outside Australia. Your personal information might be stored or accessed in these countries. We take reasonable steps to make sure your information is protected and handled in line with the Australian Privacy Act.

For more information about which countries your information may be sent to, please refer to Count's [Privacy Policy](#) or contact us directly. If you do not wish for your information to be transferred overseas, please let us know.

## Accessing or correcting your information

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can ask to access or correct your personal information at any time by contacting us.

A copy of our Privacy Policy is on Count's website [www.count.au](http://www.count.au). We can also send you a copy if you contact us.

# ADVISER PROFILE

## About Reuben Zelwer

The Authorised Representative number for Reuben Zelwer is 223804 and their details are available on the [Financial Advisers Register](#).

### What experience does the adviser have?

Reuben Zelwer has been a financial planner for the past 25 years, most of which has been in private practice. Reuben's career experience includes working at a leading Trustee company and as an Accountant at KPMG.

Reuben is a [Certified Financial Planner practitioner](#)® (CFP)

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### What qualifications has the adviser completed?

Qualification Name
<ul style="list-style-type: none"><li>Graduate Diploma in Financial Planning from FINSIA</li><li>Bachelor of Accounting (B Acc) from Monash University.</li></ul>

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- Graduate Diploma in Financial Planning from FINSIA
  - Bachelor of Accounting (B Acc) from Monash University.
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### What products and services can the adviser provide?

Reuben Zelwer is authorised to provide the following products and services:

- Basic deposit products
  - Life insurance
  - Government debentures, stocks and bonds
  - Managed investment schemes (Unit Trust and Managed Discretionary Account services)
  - Retirement Savings Accounts
  - Securities
  - Superannuation
  - Standard margin lending
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### How will your financial adviser be paid for the services provided?

All fees and commissions disclosed in the FSG which are attributed to the services provided to you by your adviser are paid to Paragem who will pay up to 100% of those fees and commissions to Adapt Wealth Management. Paragem will charge Adapt Wealth Management for licensee services and is not linked to client revenue.

Reuben as the and owner of Adapt Wealth Management is entitled to the net income of the business

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