

## Public Disclosure

### Licensing Information

ACNL Limited (trading as Top Mortgage), FSPR Number: 767731

Top Mortgage is an authorised to provide a financial advice service under a current financial advice provider licence issued by the Financial Markets Authority in the name of: ACNL Limited; FSPR Number: 767731

### Nature and Scope of Advice

The company offers a range of products including Home loan, Property Development loan, Business & Commercial loan, and the Risk Insurance

### Lenders We Work With

We source loans from a panel of lenders. The current lenders we can use include:

- ANZ
- Westpac
- BNZ
- ASB
- Kiwibank
- Heartland Bank
- SBS Bank
- The Co-operative
- Avanti Finance
- Liberty Financial
- Bank of China
- China Construction Bank
- Industrial and Commercial Bank of China
- ASAP Finance
- Cressida Capital
- DBR
- General Finance
- Avanti Finance
- Prospa
- Xceda
- Finebase
- Bizcap
- Unity Pepper Money
- Resimac
- Southern Cross
- CFML
- Pallas Capital

### Personal Risk Insurance Providers We Work With

- AIA
- Partners Life
- Asteron
- Chubb
- Partners life
- Nib

In providing you with financial advice, I will only consider existing personal term life, trauma, income protection and health insurance policies (if any). We will not provide advice on existing whole of life or endowment products, so you will need to consult a specialist if you would like advice on those products. We unable take into consideration or provide advice on financial products issued outside of New Zealand.

### Limitations on Advice

In providing you with financial advice, we will only consider existing personal term life, trauma, income protection, and health insurance policies (if any). We do not provide advice on existing whole of life or endowment products – you will need to consult a specialist for those products.

We are unable to take into consideration or provide advice on financial products issued outside of New Zealand.

We are unable to offer legal or tax advice and recommend you consult your solicitor or accountant for that type of advice.

### Referral Partners

We can help you with other services through our referral partners, including:

- Tower F&G
- Initio F&G
- Avanti Referrer
- Koura Wealth
- XE Money

**Important:** We are not able to give advice on the products these referral partners offer, and we have not checked to see if they can meet your specific needs. You are free to use other providers of your choice or undertake your own research.

### Fees and Expenses

Generally, you will not be charged any fees for the financial advice we provide to you. We are paid through commissions and other payments we receive from the lenders you obtain financing from.

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

Scenario	Description
<b>No commission</b>	If you request that we provide financial advice and we do not receive a commission from the lender, we may charge you a one-off fee. Any such fee would be agreed and authorized by you in writing before we complete the services, and would be based on an estimate of the time spent providing the advice. This may arise if you request services for a product offered by a lender we do not hold accreditation with, or a product outside our usual arrangements.
<b>Commission clawback</b>	If you make certain changes to your loan within 28 months following drawdown, or to your insurance within 24 months following the commencement date, the lender or insurer can require us to repay the commission we received (up to 100% – called a “clawback”). If this occurs, we may charge you a one-off fee.
<b>Locked-in interest rate not proceeding</b>	Where an interest rate is locked in on a new loan and you subsequently decide not to proceed with the loan, a service fee of \$1,750 plus GST (if any) will apply.
<b>Second-tier lender arrangement fee</b>	Where a loan is approved through a second-tier lender and you accept the lending offer (whether or not the loan is drawn down), a fee of at least 1% of the approved loan amount will apply.

### Other Incentives

From time to time, product providers may also reward us for the overall business we provide to them. They may give us tickets to sports events, hampers, or other incentives.

### How We Manage Conflicts of Interest

To ensure that our financial advisers prioritise your interests above their own:

- We follow an advice process that ensures our recommendations are made on the basis of your individual goals and circumstances
- All our financial advisers undergo annual training on how to manage conflicts of interest
- We maintain registers of conflicts of interests, and the gifts and incentives we receive
- Top Mortgage monitor these registers and provide additional training where necessary

- We perform an annual review of our compliance programme

### Complaints Handling and Dispute Resolution

If you are not satisfied with our financial advice service you can contact our Managing Director to make a complain:

Email: [annie@topm.co.nz](mailto:annie@topm.co.nz)

Phone: 09 949 0099

Post: Unit D, 12 Amera Place, Huntington Park, Auckland

When we receive a complaint, we will consider it following their internal complaints process:

- We will consider your complaint and let you know how we intend to resolve it.
- We may need to contact you to get further information about your complaint.
- We aim to resolve complaints within 10 working days of receiving them.
- If we can't, we will contact you within that time to let you know that we need more time to consider your complaint.
- We will contact you by phone or email to let you know whether we can resolve your complaint and how they propose to do so.

If we can't resolve your complaint, or you aren't satisfied with the way we propose to do so, you can contact Insurance & Financial Services Ombudsman Scheme Inc.

Insurance & Financial Services Ombudsman Scheme Inc. provides a free, independent dispute resolution service that may help investigate or resolve your complaint, if we haven't been able to resolve your complaint to your satisfaction.

You can contact Insurance & Financial Services Ombudsman Scheme Inc. by emailing [info@ifso.nz](mailto:info@ifso.nz), or by calling: 0800 888 202 or +64 4 499 7612.

You can also write to them at: PO Box 10-845, Wellington 6143, New Zealand.

### Duties Information

Top Mortgage, anyone who gives financial advice on our behalf, have duties under the Financial Markets Conduct Act 2013 relating to the way that we give advice.

- Give priority to your interests by taking all reasonable steps to make sure our advice isn't materially influenced by our own interests
- Exercise care, diligence and skill in providing you with advice
- Meet standards of competence, knowledge and skill set by the Code of Professional Conduct for Financial Advice Services (these are designed to make sure that we have the expertise needed to provide you with advice)
- Meet standards of ethical behaviour, conduct and client care set by the Code of Professional Conduct for Financial Advice Services (these are designed to make sure I treat you as I should and give you suitable advice).

This is only a summary of the duties that I have. More information is available by contacting us or by visiting the the Financial Markets Authority website at <https://www.fma.govt.nz>.

### Availability of Information

This information can be provided in hardcopy upon your request.