



Financial Advice Provider (FAP) Disclosure Statement

Licensing Information

Wright Financial Solutions Limited (FSP500886) holds a full Class 2 Financial Advice Provider (FAP) licence issued by the Financial Markets Authority. Wright Business Solutions Limited (FSP728711) is an Authorised Body under that licence. Both companies trade as Wright Financial.

There are no conditions on Wright Financial Solutions Limited's licence that limit or restrict the nature or scope of the financial advice services described in this disclosure statement.

What Are Wright Financial's Identifying Details?

Financial Adviser Name and No.: Kathy Wright-St Clair (FSP41204)
Financial Advice Provider (FAP) and No.: Wright Financial Solutions Limited t/a Wright Financial (FSP500886)
Financial Adviser Name and No.: Jared Wright-St Clair (FSP368286)
Authorised Body (AB) Name and No.: Wright Business Solutions Limited t/a Wright Financial (FSP728711)

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Physical Office Address: 2/2 Arawata Street, Te Awamutu 3800
Postal Address: PO Box 9419, Waikato Mail Centre, Hamilton 3240, NEW ZEALAND
Web Address: www.wrightfinancial.co.nz

What Is the Nature and Scope of Wright Financial's Advice?

Wright Financial provides financial advice in relation to **mortgage lending, life insurance, health insurance, general insurance and investment services**. Its financial advisers provide advice on financial products within the areas they are authorised and competent to advise on.

When a Wright Financial, financial adviser provides you with financial advice, they will consider your current financial position, spending patterns, objectives and tolerance for risk. They will analyse the relevant information and endeavour to provide their recommendations within the timeframe agreed with you.

Our financial advisers will present their recommendations in plain English, based on the information obtained at the time. Their advice is intended to help you make an informed decision about achieving your financial goals. These may include investing for the future or retirement, purchasing property, managing or repaying debt, and protecting your life, health, assets and wealth.

What Are Wright Financial's Duties and Obligations?

Wright Financial and its financial advisers have duties and obligations under the Financial Markets Conduct Act 2013 relating to how financial advice is provided.

We are required to:

- Take reasonable steps to ensure that you understand the nature and scope of the financial advice, including any limitations on the advice.
- Provide financial advice that is suitable for you, having regard to the nature and scope of the advice and your relevant needs and circumstances.
- Treat you fairly, including listening to your needs, concerns and preferences, and treating you with respect.
- Act with integrity and appropriately manage any conflicts of interest.
- Give priority to your interests by taking all reasonable steps to ensure that our advice is not materially influenced by our own interests or the interests of another person.
- Exercise the care, diligence and skill that a prudent person engaged in providing financial advice would exercise in the same circumstances.
- Take reasonable steps to ensure that you understand the advice, including its material risks and consequences.
- Communicate with you in a timely, clear and effective manner.
- Take reasonable steps to protect your information against loss and unauthorised access, use, modification or disclosure.

- Meet the applicable standards of competence, knowledge and skill and undertake ongoing professional development.
- Meet the standards of ethical behaviour, conduct and client care required by the Code of Professional Conduct for Financial Advice Services.

This is a summary of our principal duties and obligations. Further information is available by contacting us, visiting the [Financial Markets Authority](#) website or reviewing the [Code of Professional Conduct for Financial Advice Services 2025](#).

What Is Wright Financial's Complaints and Dispute Resolution Process?

If you have a complaint about our financial advice or services, please contact us so we can try to resolve it through our internal complaints process.

You can make a complaint by:

- emailing info@wrightfinancial.co.nz;
- or writing to Internal Dispute Resolution, Wright Financial, PO Box 9419, Hamilton 3240.

Please explain the issues and the nature of your concerns.

When we receive your complaint, we will:

- acknowledge it by telephone or email within two working days;
- consider the matters you have raised and contact you if we need further information;
- explain how we propose to resolve your complaint; and
- keep you informed if we need additional time to investigate or respond.

If we cannot resolve your complaint to your satisfaction, you may contact the **Insurance & Financial Services Ombudsman Scheme (IFSO Scheme)**. The IFSO Scheme provides a free and independent service for resolving complaints about insurance and financial services.

You can contact the IFSO Scheme: by emailing info@ifso.nz or by telephone: 0800 888 202. You can also write to them at: PO Box 10-845, Wellington 6143, NEW ZEALAND or website: www.ifso.nz.

Availability of Information

If any information required under the financial advice disclosure requirements is provided to you orally, you may ask us to provide that information in writing.

What Fees Does Wright Financial Charge?

Wright Financial generally does not charge clients a fee for mortgage advice or for arranging mortgage lending. However, a fee may apply in some lending circumstances. If a fee applies, we will disclose the amount of the fee, or how it will be calculated, and when it is payable before you agree to proceed.

Wright Financial generally does not charge clients a fee for insurance advice or for arranging insurance products. However, we may charge a fee where a client receives insurance advice but does not proceed with an insurance product through Wright Financial. If a fee applies, we will disclose the amount of the fee, or how it will be calculated, and when it is payable before you agree to proceed.

Wright Financial may charge fees for preparing an investment plan, arranging or implementing an investment portfolio, or completing work outside or beyond the estimated time included in the agreed scope of service. If a fee applies, we will disclose the amount of the fee, or how it will be calculated, and when it is payable before you agree to the relevant service.

How Does Wright Financial Manage Conflicts of Interest and Incentives?

Wright Financial Solutions Limited or Wright Business Solutions Limited may receive commission, depending on which business provides the relevant financial advice service and arranges the financial product.

For mortgage lending and other loans, the relevant Wright Financial business may receive commission from the bank or lender after the lending is drawn down or settled. The commission is generally calculated by reference to the amount of lending drawn down.

For life, health and general insurance, the relevant Wright Financial business may receive commission from the insurer when a policy is issued. The commission is generally calculated by reference to the premium payable for the policy.

The relevant Wright Financial business may also receive client-paid fees, provider-paid commissions or referral payments in connection with investment, KiwiSaver, UK pension transfer and currency exchange services. Further information about this remuneration is provided later in this disclosure statement.

To ensure our financial advisers give priority to their clients' interests, we follow a structured six-step advice process based on each client's goals, needs and circumstances.

Our financial advisers receive regular training on managing conflicts of interest. We also maintain and monitor registers of conflicts, gifts and incentives, provide additional training where required, and review our compliance programme annually.

Who Are the Lenders Wright Financial Works With and Why?

We work with the five major banks and a range of other banks operating in New Zealand, non-bank lenders, development finance providers and short-term lenders. Working with multiple providers allows us to consider a broad range of lending solutions from within our approved lender panel.

These solutions include principal-and-interest (P&I) mortgages, revolving credit facilities, personal and business lending, development finance and short-term lending. Short-term lending may involve principal-and-interest repayments or capitalised interest and may be secured by residential or other property.

The lending solution recommended by your financial adviser will depend on your individual circumstances, goals, requirements and timeframe, and the suitability of the available options.

- **Main-Bank Lenders – Home Loan and Mortgage Finance for Individuals and Businesses**
ANZ, ASB, BNZ, AIA NZ GO Home Loan (existing clients only), Heartland Bank, Kiwibank, SBS, The Co-operative bank and Westpac.
- **Non-Bank Lenders – Home Loan and Mortgage Finance for Individuals and Businesses**
ASAP Finance, Avanti Finance, Basecorp Finance, Blackwell Global, Bluestone (existing clients only), cfi Finance, Conrad Funds Management Ltd (CFML), Cressida Capital, DBR, First Mortgage Trust, Funding Partners, GEM, General Finance, Gold Band Finance, Liberty Financial, Pallas Capital, Pepper Money, Plus Finance, Resimac Home Loans (existing clients only), and Southern Cross Partners.
- **Main-Bank Lenders – Reverse Mortgage Finance for Individuals**
Heartland Bank and SBS.
- **Non-Bank Lenders – Personal and Business, Secured and Unsecured Finance**
GEM, Metro Finance, Open for Business, Prospra NZ, Simplify and Unity.

Our approved lender panel and accreditations may change from time to time. We will explain which lenders and products we are able to consider within the agreed nature and scope of our advice.

Who Are the Insurers Wright Financial Works With and Why?

We work with a range of life, health and general insurers. Working with multiple insurers allows us to consider a broad range of insurance solutions from within our approved insurer panel.

The insurance solutions we can advise on include life, health, income protection, trauma and total and permanent disability cover, as well as house, contents and motor vehicle insurance. The cover recommended by your financial adviser will depend on your individual circumstances, objectives, insurance needs, risk tolerance and affordability.

Wright Financial's general insurance advice is limited to house, contents and motor vehicle insurance. Wright Financial may arrange a quote and, where the client accepts the quote, the insurer or insurance provider will issue the relevant policy documents.

- **Life Insurers – Life and Income Insurance for Individuals and Businesses**
AIA, Asteron Life, Chubb, Fidelity Life and Partners Life.
- **Health Insurers – Health and Medical Insurance for Individuals and Businesses**
AIA, NIB, Partners Life and Southern Cross.
- **General Insurers – Fire and General Insurance for Individuals**
AON Stylecover (Vero) and Tower.

Our approved insurer panel and accreditations may change from time to time. We will explain which insurers and products we are able to consider within the agreed nature and scope of our advice.

Who Are the Investment Providers Wright Financial Works With and Why?

We work with a range of KiwiSaver, managed fund and UK pension transfer providers. Working with multiple providers allows us to consider a broad range of investment solutions from within our approved provider panel.

The investment solutions available through these providers may include KiwiSaver schemes, diversified managed funds and, in some circumstances, UK pension transfer solutions. Depending on the provider, product and investment option selected, underlying investments may include New Zealand, Australian and international equities, government and corporate bonds, cash and other assets.

Any investment or fund recommended by your financial adviser will depend on the agreed nature and scope of the advice and your individual circumstances, goals, investment timeframe, liquidity requirements, and tolerance and capacity for risk. Investment values and returns can rise or fall, and withdrawals may be subject to legislative requirements and the relevant product's terms.

- **KiwiSaver Providers – Superannuation for Individuals**
Booster, Fisher Funds, Generate, Milford Funds, NZ Funds and Select Wealth Management.
- **QROPS UK Pension – UK Transfer Service**
NZ Funds and iSelect.
- **Managed Funds Providers – Diversified Investment Services for Individuals**
NZ Funds and Select Wealth Management.

Our approved investment provider panel and accreditations may change from time to time. We will explain which providers and products we are able to consider within the agreed nature and scope of our advice.

How Is Wright Financial Paid for Arranging Finance?

The relevant Wright Financial business may receive commission from the lender when your lending is drawn down or settled. Commission is generally calculated as a percentage of the lending drawn down or the outstanding lending balance.

The commission rates paid by lenders on our approved panel are shown below. The commission structure and payment timing vary between lenders and may consist of:

- an upfront commission paid after the lending is drawn down or settled;
- an ongoing trail commission calculated on the outstanding lending balance; or
- a combination of upfront and trail commission.

Some lenders allow Wright Financial to select between different commission structures, such as a higher upfront commission with no trail commission or a lower upfront commission combined with ongoing trail commission. The applicable structure will depend on the lender and arrangement selected.

Note: Lender commission is paid to the relevant Wright Financial business and is not charged to you as a separate fee. However, commission forms part of the lender's overall costs and creates a potential conflict of interest. Wright Financial manages this through its conflicts-of-interest controls.

Lender	Upfront Commission	Annual Trail Commission	Mortgage Refix
ANZ Bank	0.85%	N/A	\$200.00
ANZ Bank - Flexi	0.425%	N/A	\$200.00
ASB Bank	0.85%	N/A	\$150.00
ASB Bank - Orbit	0.595%	N/A	N/A
Avanti Finance	0.80%	N/A	N/A
Bluestone (existing clients only)	0%	0.15%	N/A
BNZ Bank	0.55%	0.15%	N/A
AIA NZ GO Home Loan (existing clients only)	0.60%	0.20%	N/A
Heartland Bank – Reverse Mortgage	\$1,500.00	N/A	N/A
Heartland Bank – Asset Finance	2.00%	N/A	N/A
Heartland Bank – Business Loan	2.00%	N/A	N/A
Kiwibank - Residential	0.55%	0.15%	N/A
Liberty Financial – Star	0.60%	0.15%	N/A
Liberty Financial – Nova	0.70%	0.30%	N/A
Liberty Financial – Private	0.70%	0.30%	N/A
Pepper Money – Prime	0.60%	0.15%	N/A
Pepper Money – Specialist	0.75%	0.15%	N/A
Prospera NZ – Small Business Loans	3.00%	N/A	N/A
Resimac – Prime (existing clients only)	0%	0.15%	N/A
Resimac – Specialist (existing clients only)	0%	0.15%	N/A
SBS Bank – Residential (<85% LVR)	0.80%	N/A	\$150.00
SBS Bank – Residential (>85% LVR)	0.75%	N/A	\$150.00
Simplify (Referral Fee Varies)	Varies	N/A	N/A
The Co-operative Bank – Home Loan	0.85%	N/A	\$150.00
The Co-operative Bank – Revolving Credit	0.70%	N/A	N/A
The Co-operative Bank – Personal Loan	3.00%	N/A	N/A
Unity – Home Loans (<80% LVR)	0.80%	N/A	N/A
Unity – Home Loans (>80% LVR)	0.70%	N/A	N/A
Unity – Personal Loans	3.50%	N/A	N/A
Westpac Bank – Residential	0.90%	N/A	N/A
Westpac Bank - Commercial	0.50%	N/A	N/A

The following lenders will capitalise the brokerage fee onto the loan amount.

Lender	Broker Fee
ASAP Finance	1%
Avanti Finance	1%
cfi Finance	4%
DBR	1%
First Mortgage Trust	1%
General Finance	1%
Metro Finance	1%
Plus Finance	1%
Southern Cross Partners	1%

Lender	Broker Fee
Basecorp Finance	1%
Blackwell Global	1%
Conrad Funds Management Ltd (CFML)	1%
Cressida Capital	1%
GEM	3.5% - 5%
Funding Partners	1%
Gold Band Finance	1%
Pallas Capital	1%

What Commission Clawbacks May Apply?

A commission clawback may occur if lending is repaid, refinanced or otherwise discharged within the lender's applicable clawback period. For example, this may happen if you sell the secured property or refinance the lending to another lender.

If a clawback applies, the lender may require the relevant Wright Financial business to repay all or part of the commission it received. The amount and applicable period vary between lenders and are set out in the schedule below.

Lender		Clawbacks			
ANZ Bank	Months in place	0-6	7-12	13-18	19-24
	Amount Paid Back	100% - 79.15%	74.98% - 54.13%	49.96% - 29.11%	24.94% - 4.09%
ASB Bank	Months in place	0-6	7-12	13-18	19-24
	Amount Paid Back	100% - 79.15%	74.98% - 54.13%	49.96% - 29.11%	24.94% - 4.09%
Avanti Finance - Prime	Months in place	0-6	7-12		
	Amount Paid Back	100%	50%		
Avanti Finance – Near Prime	Months in place	0-12	12-24		
	Amount Paid Back	100%	50%		
Bluestone (existing clients only)	Months in place	0-6	7-12	13-18	19-24
	Amount Paid Back	100%	75%	50%	25%
BNZ Bank	Months in place	0-6	7-12	13-18	19-24
	Amount Paid Back	100% - 79.15%	74.98% - 54.13%	49.96% - 29.11%	24.94% - 4.00%
AIA NZ GO Home Loan (existing clients only)	Months in place	0-12			
	Amount Paid Back	100%			
Kiwibank	Months in place	0-6	7-12	13-24	
	Amount Paid Back	100%	50%	25%	
Liberty Financial	Months in place	0-6	7-12	13-18	19-24
	Amount Paid Back	100%	75%	50%	25%
Pepper Money - Prime	Months in place	0-12	13-18		
	Amount Paid Back	100%	50%		
Pepper Money – Specialist	Months in place	0-6	7-12		
	Amount Paid Back	100%	50%		
Resimac – Prime (existing clients only)	Months in place	0-12	13-27		
	Amount Paid Back	100%	50%		
Resimac – Specialist (existing clients only)	Months in place	0-12	13-18		
	Amount Paid Back	100%	50%		
SBS Bank	Months in place	0-6	7-12	13-18	
	Amount Paid Back	100%	50%	25%	
The Co-operative Bank	Months in place	0-9	10-18	19-27	
	Amount Paid Back	100%	66%	33%	
Unity	Months in place	0-12	12-18	18-24	
	Amount Paid Back	100%	75%	50%	
Westpac Bank	Months in place	0-6	7-12	13-18	19-24
	Amount Paid Back	100% - 79.15%	74.98% - 54.13%	49.96% - 29.11%	24.94% - 4.09%

How Is Wright Financial Paid for Arranging Insurance?

The relevant Wright Financial business may receive commission from an insurer when a policy is issued. Commission is generally calculated as a percentage of the annual premium for the policy. The commission rates paid by insurers on our approved panel are shown in the schedule below.

Depending on the insurer and commission structure selected, commission may consist of:

- an upfront commission paid after the policy is issued;
- an ongoing commission paid while the policy remains in force; or
- a combination of upfront and ongoing commission.

Where an insurer offers different commission structures, the relevant Wright Financial business may receive a lower upfront commission with a higher ongoing commission, or a higher upfront commission with a lower ongoing commission. The applicable structure will depend on the insurer, policy and commission arrangement selected.

Insurer	Product Type	Upfront Commission % based on annual Premium	Annual Trail Commission % based on annual Premium
AIA	Rate for Age Premium, Life, Trauma, IP, TPD	190%	7.5%
AIA	Level Premium, Life, Trauma, IP, TPD Cover	150%	3.0%
AIA	Health Cover (incl. Private Health / Plus)	120%	7.5%
Asteron	Rate for Age & Level, Life, Trauma, IP, TPD	190%	5% - 10%
Chubb	Rate for Age, Life, Trauma, TPD Cover	220%	7.50%
Chubb	Level Life, Trauma, TPD Cover	190%	7.50%
Chubb	Income Protection, Specific Injury Cover	190%	7.50%
Chubb	Monthly Disability	180%	7.15%
Chubb	Redundancy	115%	7.50%
Fidelity Life	All Life, Trauma, IP & TPD Cover	230%	7.5%
Nib	Ultimate Health / Max & Easy Health Cover	140%	5.0%
Partners Life	All Life, Trauma, IP & TPD Cover	200%	7.5%
Partners Life	Health Cover	100%	5 %
Southern Cross	Wellbeing One and Two Cover	30%	\$138 Per Member

What Insurance Commission Clawbacks May Apply?

A commission clawback may occur if an insurance policy is cancelled, reduced or otherwise changed within the insurer's applicable clawback period. This may happen because of a change in your circumstances, cover or insurer.

If a clawback applies, the insurer may require the relevant Wright Financial business to repay all or part of the commission it received. The amount and applicable period vary between insurers and are set out in the schedule below.

Insurer		Clawbacks (Months)			
AIA	Months in place	0 – 11	12 – 17	18 – 23	24+
	Amount Paid Back	100%	50%	25%	0%
Asteron Life	Months in place	0 – 12	12 – 24		
	Amount Paid Back	100%	50%		
Chubb	Months in place	0 – 8	9 – 16	17 – 24	
	Amount Paid Back	100%	66%	33%	
Fidelity Life	Months in place	0 – 4	5 – 12	13 – 24	
	Amount Paid Back	100%	95% - 65%	60% - 0%	
Nib	Months in place	0 – 24			
	Amount Paid Back	100%			
Partners Life	Months in place	0 – 24			
	Amount Paid Back	100%			
Southern Cross	Months in place	0 – 12			
	Amount Paid Back	100%			

How Is Wright Financial Paid for Providing Investment Services?

Wright Financial charges a one-off establishment fee for implementing a managed fund investment portfolio. The fee is equal to 2% of the amount invested where the investment is \$50,000 or less, and 1% where the investment exceeds \$50,000. The fee is payable when the investment portfolio is implemented. With your agreement, it may be deducted from the amount being invested or paid directly by you by the 20th day of the month following the date of our invoice.

The relevant Wright Financial business may also receive ongoing commission of up to 0.75% per annum, calculated by reference to the value of the investment portfolio. The provider may deduct this commission from the investment portfolio before paying it to the relevant Wright Financial business. This is one ongoing commission and is not charged twice.

Investments	Provider	Initial Fee or Commission	Ongoing Commission Paid Per Annum
Managed Funds	NZ Funds	2% for investments of \$50,000 or less; 1% for investments over \$50,000 *	0.75%
Managed Funds	Select Wealth Management	2% for investments of \$50,000 or less; 1% for investments over \$50,000 *	0.75%
QROPS Pension	iSelect UK Pension	2% for investments of \$50,000 or less; 1% for investments over \$50,000 *	0.56%
QROPS Pension	NZ Funds UK Pension	2% for investments of \$50,000 or less; 1% for investments over \$50,000 *	0.56%
KiwiSaver	Booster	\$0	0.25%
KiwiSaver	Fisher Funds	\$20	0.25%
KiwiSaver	Generate	\$40 - \$240	\$0
KiwiSaver	Milford Funds	\$0	0.35% (Adults)
KiwiSaver	Milford Funds	\$0	0.20% (Children)
KiwiSaver	NZ Funds	\$50 - \$100	\$20 - \$200
KiwiSaver	Select Wealth Management	\$30 - \$150	0.25%

Investment providers marked with an asterisk (*) deduct the applicable fee or commission from the amount being invested or from the client's investment portfolio.

Providers without an asterisk pay the applicable commission directly to the relevant Wright Financial business, rather than deducting it from the amount the client invests. However, the provider may factor commission into its overall fees and costs.

The applicable fees, commission rates or methods of calculation, and their effect on your investment, will be disclosed before you agree to proceed.

How Is Wright Financial Paid for Arranging General Insurance?

The relevant Wright Financial business may receive commission from the insurer when a general insurance policy is arranged. The commission is calculated as a percentage of the policy's net premium. The applicable commission rates are shown below and will be disclosed to you before you agree to proceed.

AON Stylecover (Vero)	15% of the net insurer premium, being the amount remaining after administration charges, EQC levies, Fire and Emergency levies and GST have been deducted
Tower	15% of the net insurer premium, being the amount remaining after administration charges, EQC levies, Fire and Emergency levies and GST have been deducted

No clawback applies to this commission.

How Is Wright Financial Paid for Referring Currency Exchange Services?

Wright Financial may refer clients requiring currency exchange services to the provider listed below. If the provider pays a referral fee or commission to the relevant Wright Financial business, the applicable amount or calculation method will be disclosed to you before the referral is made.

XE Money	25% of gross profit
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