

FINANCIAL SERVICES GUIDE

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Xylem Wealth Advisers
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WEALTH ADVISERS

This Financial Services Guide ('FSG') was prepared on 10th November 2026 and should be read with the Adviser Profile document. The FSG is not complete without it.

What is a Financial Services Guide?

This Financial Services Guide ('FSG') helps you understand and decide if you wish to use the financial services that we are able to offer you.

It provides you with information about the entities that may provide you with financial services:

- Spark Advisors Australia Pty Ltd, the "Licensee"
- the Licensee's Corporate Authorised Representative, AG Fin Wings Pty Ltd T/A Xylem Wealth Advisers ('Xylem Wealth Advisers'); and
- individual Authorised Representatives of the Licensee.

We collectively refer to Authorised Representative(s) in this FSG as "us, our, we". We are the providing entity and are the authorised representative(s) of the Licensee. Our corporate authorised representative number is 001324182.

This FSG sets out the services we provide. It tells you:

- who we are and how we can be contacted;
- who the Licensee is and how it can be contacted;
- what services and products we are authorised to provide to you;
- how we (and any other relevant parties) are paid; and
- how we deal with complaints.

Lack of Independence

We are not able to describe ourselves as being independent, impartial or unbiased because:

- We may receive commission on life insurance products we recommend as explained in this FSG under the heading 'What fees and commissions are payable to us'.
- We may receive commissions or other benefits from financial services providers as a result of products we recommend or referrals that we provide which are detailed in this FSG under the heading 'How are we and third parties remunerated'.
- We may receive non-monetary benefits such as training and education seminars from product providers.
- We have an approved product list which limits the range of products we can recommend when providing advice to you that may include financial products and services associated with the Licensee.

Other documents you may receive

We may provide you with personal advice that takes into account your needs, financial situation and circumstances. Where we provide you with personal advice, we will provide you with a Statement of Advice ('SOA'). The SOA outlines our advice and the basis on which the advice was given. It also outlines relevant information about us, our fees and charges associated with our advice. We are only able to provide personal advice about certain products as stipulated under the Licensee's Australian Financial Services License ('AFSL').

If we provide further personal advice after providing our initial advice, we may record this in a Record of Advice ('ROA'), instead of a SOA. You may request a record of the further advice that is provided to you, if you haven't already been provided with it. You can also contact us, using the details at the start of this FSG, within 7 years from when the advice is provided to request this record.

Occasionally we provide general advice. This is where we may express an opinion or recommendation influencing you in making a decision in relation to a financial product, but where we HAVE NOT considered your personal objectives, financial situation or needs. If we provide you with general advice, we will provide you with a warning that the advice may not be appropriate to your needs, financial situation or objectives. Additionally, we will provide you with an applicable Product Disclosure Statement ('PDS') (if one is available) which you should read before making a decision that the product is right for you.

When a financial product is recommended to you, you will be provided with a PDS issued by the product provider. The PDS contains information about the product to assist you in making an informed decision about the financial product. It will outline relevant terms, significant risks, and fees and charges associated with the product.

Please retain this FSG for your reference and any future dealings with us. We may also add documents at a later date which will also form part of this FSG, and these should be read together with the FSG. These documents will include the word 'FSG' in the heading.

Who will be providing the financial services to you?

The Licensee

The Licensee is the authorising licensee for the financial services provided to you and is responsible for those services.

The Licensee authorises, and is also responsible for, the content and distribution of this FSG.

The Licensee's contact details are as follows:

Licensee name: Spark Advisors Australia Pty Ltd ('Spark Advisors')

AFSL number: 380552

Address: 243 Bay Street, Brighton VIC 3186

Website: www.sparkfg.com.au

Phone: 1300 974 947

Email: compliance@sparkfg.com.au

We are the providing entity and are providing the financial services to you in our capacity as an Authorised Representative of the Licensee.

The Licensee's Authorised Representatives who may provide services to you are listed below.

Authorised Representative details

Practice Name: AG Fin Wings Pty Ltd T/A Xylem Wealth Advisers

AR Number: 001324182

Address: Suite 115, Level 1,93 George Street, Parramatta NSW 2150

Website: www.xylemwealth.com.au

Phone: 0421 367 200

The individual authorised representatives are:

Financial Adviser: Bhartendu Rajnikant Gajjar

AR number: 001233320

Phone: 0421 367 200

Email: bg@xylemwealth.com.au

The authorised representatives named above share the same office as the practice.

You can provide instructions to us by contacting us using the contact details above.

The Licensee and the Authorised Representatives listed in this FSG act on your behalf when we provide financial services to you.

What services and products are we authorised to provide to you?

We are authorised to provide personal or general financial advice on:

- Wealth management & portfolio construction
- Budget and cash flow management
- Centrelink and other government benefits
- Debt strategies (including borrowing for personal and investment purposes)
- Private wealth
- Financial coaching & strategic advice
- Investment advice
- Personal insurance (Life cover, Disability, Income Protection, Trauma, Key Person)
- Retirement planning (retirement income streams, including pensions and annuities)
- Superannuation strategies, including Self-Managed Superannuation Funds (SMSFs)
- Tax minimisation strategies
- Business Protection

We are authorised to provide financial product advice and deal in the following financial products to both retail and wholesale clients:

- deposit and payment products
- debentures, stocks and bonds
- life products including investment life insurance and life risk insurance
- managed investments (including investor directed portfolio services (IDPS))
- retirement savings accounts (RSA)
- securities and
- superannuation

Your financial adviser may also be authorised to advise on other specialist areas. These areas, together with their qualifications, are listed in their Adviser Profile.

There is an important difference between 'general advice' and 'personal advice'. If we provide you with 'general advice' it means that we have not considered any of your individual objectives, financial situation and needs.

If we provide you with 'personal advice' we will consider your individual objectives, financial situation and needs when making our recommendation to you.

We will only provide services to you, with your prior, informed consent. If you do not understand any of the information in this FSG or have any other questions relating to the terms on which we will be acting, please contact us.

In providing our services, other financial matters may arise, however, we are not authorised to assist with any financial and product services except those explained above. You should seek specific advice from the appropriate professionals on other matters relevant to you.

What fees and commissions are payable to us?

All fees and commissions for providing you with our services are initially paid to the Licensee, Spark Advisors, before being distributed to Xylem Wealth Advisers after deducting licensing fees. Information about how your Adviser is remunerated will be disclosed in the Adviser Profile.

We will discuss and agree our fee structure and payment options with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination, or part of, any of these fees.

All fees described in this FSG include GST.

Initial Advice Fees

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation, and the time it takes to prepare personal financial advice for you and are paid when you have agreed to receive our advice.

Our charges range from $2,500 to $7,700. Our charge for a no advice service will be subject to a minimum fee of $330 per hour.

We will discuss these fees with you and gain your agreement to the fees before we provide you with advice. These fees will also be provided within your SOA.

Ongoing Advice Fees

We may charge a fee to provide ongoing reviews and/or for the provision of ongoing services as part of our client value proposition. This fee will be agreed with you and is either a set amount or an amount based on the amount of funds under our advice, or a combination of both. The ongoing fee is based on the complexity of ongoing advice and the range of services provided.

Our ongoing advice fees range from $5,000 to $12,750 per annum and are indexed to CPI.

If the Adviser Service Fee (asset based) Model is opted, the ongoing fee would be between 0% and 1.1% per annum of the funds invested. For example, a 1.1% fee on $500,000 invested would be $5,500 per year.

At your annual review, if there are any further advice requirements that need to be documented, your financial adviser will provide a quote for you to approve prior to proceeding.

Your tailored ongoing service package will be discussed and agreed with you based on your individual needs and goals. The cost of these services will be provided and explained to you in detail by your Financial Adviser and detailed in your initial SOA.

Consultation Fee

For any other service you require that are not specified above, our hourly rates vary from $330 to $550 per hour depending on the level of expertise of your financial adviser.

Commissions

Life Insurance Products

Initial and ongoing commissions from insurance providers may be received by Spark Advisors. These commissions are paid to Spark Advisors by the company that issues the product that we recommend to you, and they are included

in what you pay for the product. The commissions vary and are based on the policy cost, which is the sum of the premiums you pay and may include other fees related to the product.

The initial commission is paid in the first year by the product issuer. Ongoing commissions are payments paid by product issuers in the years after the first year. These commissions are passed onto the practice.

If you initiate an increase to your cover, Spark Advisors may receive an initial commission and ongoing commissions on the increase to your policy cost. The ongoing commission on a client-initiated increase is only paid in respect of the period that starts from the first anniversary of the increase.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), Spark Advisors may receive up to 30% (excl. GST) of your annual policy cost. If the initial commission is higher than the ongoing commissions, the maximum commission that Spark Advisors may receive is set out in the table below:

Date a new product is issued	Initial commission (% of annual policy cost or increase excl. GST)	Ongoing commission pa (% of annual policy cost or increase excl. GST)
Before 1 January 2018 or before 1 April 2018 when the application was received prior to 1 January 2018	0 - 140%	0 - 38.5%
1 January 2018 - 31 December 2018*	0 - 80%	0 - 20%
1 January 2019 - 31 December 2019*	0 - 70%	0 - 20%
From 1 January 2020*	0 - 60%	0 - 20%

* Spark Advisors may receive the pre 1 January 2018 commission rates above from the product issuer if:

- your policy was issued before 1 January 2018 and you exercise an option or apply for additional cover under your policy after 1 January 2018; or
- your policy was issued before 1 January 2018 and is replaced after 1 January 2018 to correct an administrative error.

For example, for an insurance product applied for and issued on 2 February 2020 with an annual policy cost of $450, Spark Advisors would receive up to $270 (60% excl. GST) as an initial commission. Assuming the policy cost stays the same each year, Spark Advisors would receive up to $90 pa (20% excl. GST) as an ongoing commission.

You'll find details of how your insurance policy cost is calculated in the relevant PDS that we provide you. Where personal advice is provided to you, you'll also find details of the commission that Spark Advisors and we are entitled to receive, if you decide to purchase a life insurance product, in your SOA or ROA.

There will be a 100% clawback of commission where the life insurance policy is cancelled, not continued or the policy cost is reduced in the first year and 60% clawback of commission in the second year.

How are we and third parties remunerated?

You may request more details about the way these people or entities are remunerated within a reasonable time after receiving this document and before any financial services are given to you. If remuneration or other benefits are calculable at the time personal advice is given, it will be disclosed at the time that personal advice is given, or as soon as practicable afterwards. If remuneration is not calculable at that time, a statement of how the remuneration is calculated will be given to you at the time the advice is given, or as soon as practicable afterwards.

By using or continuing to use our services, you agree that:

1. All fees and charges received by us as described in this FSG (other than third party fees and charges) are a benefit given to us by you, in exchange for the services provided by us.
2. We do not charge asset-based fees where you are investing using borrowed money.
3. You understand, consent to authorise and direct us to charge you in this way.

Xylem Wealth Advisers

Xylem Wealth Advisers staff (and directors) are remunerated by salary that includes superannuation benefits. The amount of salary varies according to the staff member's position within Xylem Wealth Advisers. Our staff may also be eligible for bonus and incentive payments that is based on a number of factors, including performance, meeting customer service standards, and proper administration. In addition, staff may also be eligible for prizes such as gift vouchers ranging from $1-$50 as reward for exceptional all-round performance across a month, or $1-$500 as reward for exceptional all-round performance across a year. You may request further details of these prizes by contacting us.

Spark Advisors

The Licensee's directors and employees (including any employees of a related body corporate) are remunerated by salary and may also be awarded an annual bonus. Bonuses will depend on several factors including company performance, professionalism and adherence to compliance procedures, and team performance.

The Licensee's shareholders (including any shareholders of a related body corporate) will also receive a benefit based on the Licensee's ongoing company performance.

Referrers

Xylem Wealth Advisers do not pay a referral fee when clients are referred to us from other professionals.

With your permission you may be referred to an external specialist service provider to receive further advice. We will not receive a referral fee or commission for introducing you to any specialist.

What arrangements may influence our advice to you?

Shareholdings

Xylem Wealth Advisers, and/or an associated entity have no shares in any product provider that may influence our advice.

Benefits

From time to time, we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend workshops or conferences). We maintain a register detailing any benefit we receive which is valued up to $300, and other benefits that relate to information technology, software or support provided by a product issuer, or that relate to educational and training purposes. A copy of the register is available on request for a small charge.

Approved Product List (APL)

The Licensee has an Approved Product List which may include some funds and Model Portfolios managed by Spark Asset Management, as well as a range of financial products from product providers not associated with the Licensee. The Licensee does not require its Authorised Representatives to recommend only Spark Asset Management products.

AIA Vitality can be taken out by lives insured under eligible AIA Australia insurance policies which appear on the Licensee's APL. We will receive a $500 AIA Vitality Silver Status Reward payment in respect of the AIA Vitality membership purchased by you as a one-off payment if you reach Silver Status by the 6-month anniversary of your membership. This one-off payment is made by AIA Australia and is no additional expense to you.

What should you do if you have a complaint?

If you have a complaint, you can contact us and discuss your complaint.

Please contact the Complaints Manager of our Licensee by emailing compliance@sparkfg.com.au or using any of the contact details at the start of this FSG. We will try and resolve your complaint quickly, fairly and within prescribed timeframes.

If the complaint cannot be resolved to your satisfaction within 30 days, you have the right to refer the matter to the Australian Financial Complaints Authority (AFCA). AFCA provides a fair and independent financial services complaint resolution that is free to consumers.

Website:	www.afca.org.au
Email:	info@afca.org.au
Telephone:	1800 931 678 (free call)
In writing to:	Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001

Compensation arrangements

The Licensee has arrangements in place to maintain professional indemnity insurance which satisfies the requirements of s912B of the Act. This insurance provides cover for claims made against us and our representatives, including claims in relation to the conduct of representatives who no longer work for us but who did so at the time of the relevant conduct.

Privacy

To develop a successful financial strategy, including recommending suitable products which will meet your needs, we need to consider your personal circumstances and financial goals. We will ask you for information about your financial situation and needs prior to our initial meeting, or during our meeting to ensure our advice is appropriate for your circumstances. You have the right not to divulge this information to us if you do not wish to do so. However, in this case, your adviser will warn you about the possible consequences and how this may impact on the quality of the advice provided. Your adviser may also decline to provide advice if they feel they have insufficient information to proceed. In some instances, we will decline to provide services or advice if we feel we have insufficient information for the scope of the service or advice requested.

It is also important that you keep us up to date by informing us of any changes in your circumstances, so we are able to determine if our advice continues to be appropriate. You may contact us to update your personal information.

We keep a record of your personal information and advice documents for a period of no less than 7 years. On your request, we can provide you with a copy of this information. Charges may apply to cover external costs incurred as a result of accessing and providing you with this information plus a 10% administration fee.

To provide our services to you, your personal information may be transferred or disclosed overseas as some services providers connected to the administration of your accounts and other services we provide are located outside of Australia. Where information is transferred or disclosed overseas, we will ensure that our contractual arrangements contain provisions requiring that the recipient has appropriate data handling and security systems in place to prevent misuse, loss or unauthorised disclosure in accordance with Australian Privacy laws and standards.

We are committed to implementing a Privacy Policy which will ensure the privacy and security of your personal information. Any personal information collected from you will be handled in accordance with our Privacy Policy. Our Privacy Policy details how we comply with the requirements of the Privacy Act in the handling of our personal information. A copy of our Privacy policy can be found in our website (www.sparkfg.com.au). If you require further information, please let us know.

Please note that the information you have provided will be shared amongst certain third parties including:

- Spark Advisors and any related entity of Spark Advisors engaged to carry out or assist with its functions and activities (for example compliance and paraplanning services provided by Spark Financial Group),
- Financial product providers,
- Service providers engaged to provide financial planning related services including but not limited to paraplanning, compliance (Fourth-Line, Advice RegTech), administration, estate planning and financial services software (Iress, Umlaut). This includes service providers located outside of Australia, including Philippines, Vietnam, Malaysia, India and potentially other countries in Southeast Asia. For a current list of providers engaged by the Licensee, please ask your financial adviser.
- Companies involved in communicating the information in the FSG to any of the above parties, may use services such as electronic mail services, cloud storage services such as Google Drive, OneDrive and/or document creation services.

The information above will be shared as outlined unless otherwise directed by you.

Preparation date: 10th November 2026 **Version**: 01.26

Our Financial Advisers

This document is the Adviser Profile of the Financial Services Guide (FSG). The FSG is not complete without it.

About Me

Bhartendu Rajnikant Gajjar

Director / Principal Financial Adviser

ASIC Authorised Representative Number: 001233320

Phone: 0421 367 200

Email: bg@xylemwealth.com.au

I am sub-authorised to provide the financial services described in the FSG by AG Fin Wings Pty Ltd T/A Xylem Wealth Advisers, CAR No. 001324182 ('Xylem Wealth Advisers') which is a Corporate Authorised Representative of Spark Advisors Australia Pty Ltd ABN 34 122 486 935 AFSL 380552.

In this document, the terms, 'I', 'me', 'us', 'we' and 'our' refers to your adviser & Xylem Wealth Advisers. The term 'Licensee' refers to Spark Advisors.

Lack of Independence

I am not able to describe myself as being independent, impartial or unbiased because:

- I may receive commission on life insurance products I recommend as explained in this FSG under the heading 'What fees and commissions are payable to us'.
- I may receive commissions or other benefits from financial services providers as a result of products I recommend or referrals that I provide which are detailed in this FSG under the heading 'How are we and third parties remunerated'.
- I may receive non-monetary benefits such as training and education seminars from product providers.
- Our Licensee has an approved product list which limits the range of products I can recommend when providing advice to you that may include financial products and services associated with the Licensee.

Experience, Qualifications and Professional Memberships

I have spent over twenty years as a Financial Adviser / Wealth Professional offering advice to individual clients, as well as small and large business clients nationally and internationally. Prior to Spark Advisors, I was a Financial Adviser with various financial organisations, including Westpac Banking Corporation and ANZ Bank.

I hold a Master of Business Administration (Finance), Diploma of Financial Planning, Advanced Diploma of Financial Services, Bachelor of Commerce and Accounting and am a member of the Financial Planning Association of Australia Limited.

My Associations or Relationships

I have an association with Xylem Wealth Advisers as a director. Fees and commissions are paid to Xylem Wealth Advisers by Spark Advisors for distribution to me by way of Director's Fees.

Product and Service Advice Offered

I am authorised to provide financial product advice and deal in the following financial products to both retail and wholesale clients:

- deposit and payment products
- debentures, stocks and bonds
- life products including investment life insurance and life risk insurance
- managed investments (including investor directed portfolio services (IDPS))
- retirement savings accounts (RSA)
- securities
- standard margin lending facilities; and
- superannuation including self-managed superannuation funds

I am not authorised to provide financial product advice or deal in the following financial products:

- direct equities other than Exchange Traded Funds (ETFs) and Listed Investment Companies (LICs) which are approved under the Licensee Approved Product List

I am a qualified tax relevant provider and can provide tax (financial) advice services to retail clients.

Please ask me if you would like a referral for any other services. If I receive a specific fee for this referral, it will be disclosed in an advice document such as a Statement of Advice ('SOA'), if I provide you with personal advice.

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