

BRAMWELL BROWN LTD

INVESTMENT ADVISERS – BROKERS

Director: Brett Dymond – AFA, BBS, GradDipBusStud (Personal Financial Planning)

Secondary Disclosure Statement (Authorised Financial Adviser)

Brett Herbert Dymond – FSP 28047

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Trading Name: Bramwell Brown Limited

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This disclosure statement was prepared on: July 1st 2011

Services and Products I Provide

I have been authorised to provide you with financial adviser services of the following categories:

- Financial advice
- Investment planning services

I give advice on New Zealand and international shares, corporate bonds, capital notes, Government Bonds, preference shares, debentures, managed funds, unit trusts, warrants, bank deposits, and the Government's KiwiSaver scheme. I also provide a service whereby I administer investment portfolios on behalf of clients.

Professional Bodies

I am a member of the Institute of Financial Advisers and, as a condition of my membership I adhere to the IFA Code of Ethics and IFA Practice Standards in all facets of my practice.

How I Operate

When I provide financial adviser services I will:

1. Establish the client-adviser relationship and determine the scope of service required
2. Gather client data and determine goals and expectations
3. Analyse and evaluate the client's financial position
4. Develop and present written recommendations (if appropriate to the service required)
5. Implement the recommendations
6. Monitor and review the services provided (if appropriate to the service required)

My advice will take account of your personal objectives, financial situation and needs. It will be clear and concise, with enough detail for you to make an informed decision about whether to act on it.

My Experience and Qualifications

I have been a direct investor in the New Zealand and international debt and equity markets for over twenty-five years. I have been advising investors at Bramwell Brown since 2006.

My relevant qualifications include:

Bachelor of Business Studies – Massey University - 2006

Massey Scholar – 2006 – awarded to the top 5% of graduates each year

Graduate Diploma in Business Studies (Small Business) – Massey University – 2006

Graduate Diploma in Business Studies (Personal Financial Planning) – Massey University – 2007

Authorised Financial Adviser – May 2011

I keep my qualifications up-to-date through continuing professional development consisting of seminars, technical briefings, and conference workshops. I complete a minimum of sixty hours of continuing professional development every two years. This includes keeping up-to-date with all relevant legislation relating to the services I provide.

Professional Indemnity Insurance

To comply with the provisions of the IFA's Code of Ethics and Professional Conduct, I maintain professional indemnity insurance through Lumley General Insurance New Zealand Limited. This insurance covers negligent acts, and errors or omissions in the sale of financial products.

Professional Indemnity	\$1,000,000
Statutory Liability	\$1,000,000
Employers Liability	\$500,000
Public Liability	\$2,000,000
Internet Liability	\$250,000

Charges

Whether I am remunerated by fees, brokerage or commission will depend on the scope of service you require, and will be agreed upon before any work is undertaken. Any charges you are subject to will be explained in full before any work is undertaken.

Fees

Initial Administration Fee (paid in advance) **\$120.00**

Written Investment Advice (paid in arrears) **\$120/Hour**

Ongoing Personalised Advice (paid in advance) **\$250 per annum**

Portfolio Administration Service (paid six-monthly in arrears)

Portfolio value up to \$500,000 **0.50% per annum**

Portfolio value over \$500,000 **0.25% per annum**

Minimum administration fee (per annum) **\$500.00**

Portfolio Recording Service (paid six-monthly in arrears) **0.25% per annum**

Portfolios will be valued and reported on twice per annum. Extra valuations can be requested at any time.

Minimum fee (per annum) **\$250.00**

Additional Portfolio Valuation **\$250.00**

Brokerage

Primary Market Transactions (Initial Public Offerings)

New issues of shares and bonds are typically distributed through broking firms. Brokerage is paid to participating brokers by the firm offering the securities, and no brokerage is payable by the client. The amount of brokerage offered on any new issue will be disclosed to the client at the time.

Secondary Market Transactions

New Zealand share transactions **1.50%**

There is a minimum brokerage of \$60.00 together with an NZX trade fee of \$4.60

Australian share transactions **1.00% - 2.50%**

This percentage varies depending on the value of the trade being conducted. I can quote the exact amount for you before an order is entered. There is a minimum brokerage of AU\$60.00

United Kingdom transactions **1.75%**

There is a minimum brokerage of £35.00. Share purchases in the UK also attract stamp duty of 0.50%

Other jurisdictions – I can quote brokerage rates for transactions in other countries

New Zealand fixed interest transactions (Secondary Market) **1.00%**

There is a minimum brokerage of NZ\$50.00, together with a trade fee of \$5.50

Other Interests, Relationships or Associations

I do not have any preferential terms or production agreements with any product provider. I do have professional relationships with a number of share brokers, fund managers and financial organisations that pay Bramwell Brown Ltd brokerage or commissions on business placed with them. I am under no obligation from any organisation to place any amount of business specifically with them. JB Were NZ Ltd conducts Bramwell Brown's New Zealand equities research, and I currently place orders for New Zealand shares through that company. Bramwell Brown Ltd has a similar relationship with EL & C Baillieu in Melbourne and orders for Australian shares are placed with that company. Most other international equity orders are placed with JB Were NZ Ltd. Fixed-interest orders and some share sales are placed with Direct Broking. I am not contractually obliged to use any of these companies, however I do so on the basis of their expertise and the long-standing relationships I have developed with them. I have agency agreements with ING (NZ) Limited (now OnePath) and Fisher Funds in order to promote their KiwiSaver schemes. I have no obligation to promote their schemes ahead of any others and am under no obligation to place a percentage of my KiwiSaver business with them. I also promote the Gareth Morgan KiwiSaver scheme.

Remuneration

I will, or may receive remuneration from the following sources if I provide you with a financial adviser service:

JB Were NZ Limited	50% of brokerage charged to clients
E L & C Baillieu Limited (Australia)	40% of brokerage charged to clients
Direct Broking Limited	65% of secondary market brokerage charged to clients
Direct Broking Limited	50% of primary market brokerage paid by issuers
NZDMO (Kiwi Bonds)	Between 0.25% and 0.50% of the value of your investment
Heartland Building Society	Between 0.25% and 0.70% of the value of your investment
UDC Finance	0.25% of the value of your investment per annum
One Path (KiwiSaver)	Up to 0.025% of the value of your investment per annum
Fisher Funds (KiwiSaver)	Up to 0.025% of the value of your investment per annum

Varying rates of brokerage or commission can lead to a perceived or actual conflict of interest. Such potential conflicts of interest are mitigated by placing the interests of the client first, acting with integrity, and disclosing all rates of brokerage or commission beforehand.

Money Handling Procedures

In most cases clients will pay the various brokers directly for the securities we have purchased on their behalf. Likewise, proceeds from the sale of securities will be forwarded directly to the client. If convenience dictates funds are to be paid through Bramwell Brown Limited, they will be held in the Bramwell Brown Limited Trust Account with the National Bank. This account does not earn interest and is used solely for the clearance of client funds.