

Financial Services Guide

Part 1

4 August 2023 (Version 1.9)

This Financial Services Guide has been authorised for distribution by the authorising licensee:

Halpin Wealth Partners Pty Ltd ('Halpin Wealth Partners')

ABN 72 633 241 068

Australian Financial Services Licence No. 517210 ('AFSL')

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This Financial Services Guide ('FSG' or the 'Guide') provides you with important information about Halpin Wealth Partners Pty Ltd ('Halpin Wealth Partners' or 'Licensee') and its Authorised Representatives, who will provide you with the financial services described in this Guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your adviser or provisional adviser.

'Halpin Wealth' is the registered business name of the partnership of trusts operating under the trading name of Halpin Financial Services ABN 59 709 766 877. Halpin Wealth is an Authorised Representative (No. 331222) of Halpin Wealth Partners Pty Ltd.

This Guide consists of two parts. Part 1 of this Guide contains important information about:

- the financial services we offer as Authorised Representatives of Halpin Wealth Partners;
- Halpin Wealth Partners as the holder of an AFSL;
- the financial services that Halpin Wealth Partners offers;
- the process we follow to provide financial services;
- how we, our associates, and Halpin Wealth Partners are paid;
- any arrangements which may influence our advice to you;
- how we and Halpin Wealth Partners protect your privacy; and
- who to contact if you have a complaint or if you are not satisfied with the services provided.

Part 2 of this Guide is an Adviser and Provisional Adviser Profile and includes information on the services we are authorised to provide on behalf of Halpin Wealth Partners.

References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either Halpin Wealth Partners, its Representatives, or your 'Authorised Representatives' of Halpin Wealth Partners, as the context requires.

Not Independent

Although Halpin Wealth Partners and our Representatives/Authorised Representatives are required to act in your best interests, we are not able to describe ourselves as being independent, impartial, or unbiased because:

- Where we recommend or assist you with life risk insurance products, and you implement these product changes, we may receive commission payments directly from the Insurer.

PART 1

Part 1 contains the following sections:

- Financial Services Guide (Section 1);
- Privacy Statement (Section 2); and
- Are you satisfied? (Section 3).

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG, which we are required to provide.

About Halpin Wealth Partners

Halpin Wealth Partners is the holder of an Australian Financial Services Licence (AFSL), licence number 517210, issued by the Australian Securities and Investments Commission (ASIC).

Halpin Wealth Partners Pty Ltd is a privately owned Australian company. The shares in Halpin Wealth Partners are wholly owned by the Partners of Halpin Wealth. The Partners of Halpin Wealth are Shareholders and typically Directors of the AFSL, Halpin Wealth Partners Pty Ltd.

Halpin Wealth is one of Australia's longest-serving financial planning companies. As market leaders, we've been providing progressive wealth management advice to business owners and professionals since 1972.

Since the early days of the industry, Halpin Wealth has been at the forefront of financial advice in Adelaide and Darwin. Today, we offer a full range of services designed to grow, manage and sustain the wealth of business owners and professionals across South Australia and the Northern Territory.

SECTION 1

FINANCIAL SERVICES GUIDE

What other information should you consider before deciding whether to proceed with our recommendations?

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 and services as stipulated under our Australian Financial Services Licence ('AFSL').

In certain circumstances, a SoA may not be provided. These circumstances may include:

- 1.) where we provide you with only general advice, such as through seminars and newsletters;
- 2.) If we provide further advice after providing our initial advice, we may record this in a Record of Advice (ROA). You may request a copy of the RoA by contacting us by telephone, email or in writing at any time within seven years from when the further advice was first provided to you. Our contact details are provided in Part 2 Section 4 of this Guide.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

Who provides the financial services described in this FSG?

The financial services described in this FSG are provided by us as Representatives or as Authorised Representatives of Halpin Wealth Partners.

Part 2 of this Guide contains further details about your adviser or provisional adviser.

Who is responsible for those financial services?

As the holder of an AFSL, Halpin Wealth Partners is responsible for the financial services we provide to you. Halpin Wealth Partners acts on its own behalf when these financial services are provided to you. In relation to the financial services offered in this FSG, Halpin Wealth Partners, as the holder of an AFSL, does not act on behalf of any other person or licensee. Halpin Wealth Partners is only responsible for the services offered in the FSG.

What financial services do we offer?

We are authorised, on behalf of Halpin Wealth Partners to provide financial product advice and to deal in a wide range of products (unless otherwise stated in Part 2 of this Guide):

- deposit and payment products (basic and non-basic deposit products);
- Government debentures, stocks or bonds;
- life investment and life risk products;
- interests in managed investment schemes including investor directed portfolio services;
- standard margin lending facilities;
- retirement savings account products;
- securities (e.g. shares); and

- superannuation products (including SMSFs).

In addition, your financial adviser or provisional adviser is authorised to provide Tax (Financial) Advice Services incidental to the financial advice they provide.

Some of the services we can provide you (unless otherwise stated in Part 2 of this Guide) are:

- financial planning advice;
- MDA services;
- redundancy advice;
- retirement advice;
- cash flow advice;
- social security benefits advice; and
- estate planning services (financial planning).

MDA Services

Where we have recommended a Managed Discretionary Account via Implemented Portfolios IMA service, prior to you entering into the MDA Contract with the MDA provider (i.e. Implemented Portfolios), we will provide you with:

- The MDA Provider's FSG;
- The Investment Program booklet and the SOA in relation to the Investment Program;
- The MDA Contract and Account Application Form;
- The Platform Account Application Form and associated disclosure documents issued by the Platform Provider (where appropriate)

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further.

Did you know?

Small differences in both investment performance and fees and costs can have a substantial impact on your long-term returns. For example, total annual fees and costs of 2% of your account balance, rather than 1%, could reduce your final return.

You should consider whether features such as superior investment performance or the provision of better member services justify higher fees and costs. You may be able to negotiate to pay lower contribution fees and management costs where applicable. Ask Halpin Wealth Partners or your adviser or provisional adviser.

To find out more

If you would like to find out more, or see the impact of the fees based on your own circumstances, the Australian Securities and Investments Commission (ASIC) website (www.moneysmart.gov.au) has a managed investment fee calculator to help you check out different fee options.

How can you instruct us?

You may specify how you would like to give us instructions, for example, by phone, fax or email using any of the contact details set out on page 2 of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

How are we paid for our services?

We and Halpin Wealth Partners may receive:

- fees paid by clients;
- commissions paid by insurance providers;
- other payments by product providers; and
- other benefits.

All fees and commissions disclosed in this FSG which are attributed to the services provided to you by Halpin Wealth are paid to Halpin Wealth Partners.

Halpin Wealth Partners will pay up to 100% of those fees and commissions to Halpin Wealth for distribution as directed by the Partners of Halpin Wealth.

The Partners of Halpin Wealth have a profit share arrangement to distribute profits monthly to partners and shareholders.

The employees of Halpin Wealth receive a salary.

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

- 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.
- You understand, consent to, and authorise and direct us to charge you in this way.

What type of fees, commissions, payments, and other benefits do we receive for our services?

As part of detailed financial planning, there are costs to you at various stages of the process. Before making any recommendations, we will discuss and agree the fees with you.

Advice fees are inclusive of GST (unless otherwise stated) and payable by you at the following stages:

- 1.) **Recommendation:** For having a personalised financial plan (SoA) prepared, a plan preparation fee (up to \$11,000) is payable. The actual fee will depend on the complexity of your situation and the time it takes to prepare personal financial advice for you.

2.) **Implementation:** We may charge a placement fee and/or implementation fee to implement the recommendations in your financial plan. These are payable when you decide to proceed with the implementation of any one or more recommendations that we provide to you. The actual fee will depend on the complexity of your situation and the amount of funds invested, but will not exceed:

- a. \$5,500; or
- b. The maximum of entry fees or contribution fees specified in the Product Disclosure Statement (PDS) for the recommended product; whichever is the greater.

Where a placement fee and/or implementation fee is charged, we may rebate all or part of the initial commissions and/or ongoing commissions (exclusive of GST where applicable) to you.

3.) **Ongoing Advice Service and Reviews:** If you choose to have us conduct a review of your financial plan to ensure that your financial strategies and financial products remain appropriate to you, you may be charged a review fee. If you choose to have us provide an ongoing advice service, the actual fee will depend on the complexity of your situation and the amount of funds under advice, but will not exceed:

- a. A fixed dollar amount up to \$100,000; or
- b. Up to 1.8% p.a. of total funds under management; or
- c. 38.5% of the ongoing premium (exclusive of GST where applicable).

Note: Full details of all fees and commissions for financial services will be provided to you in a Statement of Advice (SoA), or Record of Advice (RoA) and Product Disclosure Statements (PDS) at the time of receiving any recommendation.

Payment methods

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods.

Where it is debited from your investments it is normally referred to as the Adviser Service Fee.

In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

Life Insurance Product Commissions

Initial and/or ongoing commissions from insurance providers may be received by Halpin Wealth Partners where you act on our recommendation to purchase or retain a life insurance policy. These commissions are paid to Halpin Wealth Partners (who will on pay these commissions to Halpin Wealth) by the company that issues the product that we recommend to you and they are included in what you pay for the product. They are not an additional cost to you.

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.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), Halpin Wealth Partners may receive up to 38.5% (excl. GST) of your annual policy cost. If the initial commission is higher than the ongoing commissions, the maximum commission that Halpin Wealth Partners 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)
Prior to 1 January 2020	0 – 140%	0 – 38.5%
From 1 January 2020	0 – 60%	0 – 20%

Example

We recommend an insurance product to you and it is issued in April 2023. The annual policy cost is \$3000. Should the policy cost remain unchanged, Halpin Wealth Partners may receive up to \$1800 (60% excl. GST) as an initial commission, and \$600 (20% excl. GST) as ongoing commission each year thereafter. These commissions are then on paid to Halpin Wealth.

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 Halpin Wealth Partners and we are entitled to receive, if you decide to purchase a life insurance product, in your SOA or ROA.

Referral fees

Where you are referred to us by one of our Joint Venture partners, all fees and commissions received as a result of providing you with advice will be paid to Halpin Wealth Partners who passes 100% on to the Joint Venture partner. The Joint Venture partner will then pay a

distribution both to Halpin Wealth and the Joint Venture partner. The distributions are made as follows:

- BSA Flinders Pty Ltd 22.5% / Halpin Wealth 77.5%
- Yield Business Advisory Pty Ltd 20% / Halpin Wealth 80%

The actual amount received by each party will be disclosed to you in your advice document.

If we refer you or you are referred to us by another business to provide you with services, we do not receive fees, though may pay referral fees. Those fees may vary according to the party to whom we are referring or have been referred from, and the products involved.

We will provide written notification to you if we are likely to receive referral fees for referring you to another service provider.

Does Halpin Wealth Partners charge any additional fees?

Halpin Wealth Partners will not charge you any additional fees. However, it may retain up to 100% of all fees and commissions generated by its Representatives or Authorised Representatives.

What arrangements (including interests and associations) may influence our advice to you?

'Halpin Wealth' is the registered business name of the partnership of trusts operating under the trading name of Halpin Financial Services (ABN 59 709 766 877).

Heath Visser, Michael Hart, Brendan Atkins, Jane Gun, Michael Smith and Samuel Nunn have an association with Halpin Wealth via their interest in the trusts which make up the partnership.

Halpin Wealth also has the following Joint Ventures in place:

- MSA Financial Services Pty Ltd.

MSA Financial Services Pty Ltd has been established as a Joint Venture between BSA Flinders Pty Ltd and Halpin Wealth. The joint venture has been established to provide financial services and advice to clients of BSA Flinders Pty Ltd. MSA Financial Services Pty Ltd has a service agreement with Halpin Wealth to provide advice to the clients of this Joint Venture. All advice is provided by Halpin Wealth and their advice team.

- Yield Financial Services Pty Ltd.

Yield Financial Services Pty Ltd has been established as a Joint Venture between Yield Business Advisory Pty Ltd and Halpin Wealth. The joint venture has been established to provide financial services and advice to clients of Yield Business Advisory Pty Ltd. Yield Financial Services Pty Ltd has a service agreement with Halpin Wealth to provide advice to the clients of this Joint Venture. All advice is provided by Halpin Wealth and their advice team.

Other Associations

The Partners of Halpin Wealth have a relationship with Charter Capital Finance Pty Ltd which provides mortgage broking and lending services. Halpin Wealth Partners has no involvement in these activities and is not responsible for any services, advice or products provided by this business.

Alternative remuneration

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 conferences). We maintain a register detailing any benefit we receive which is valued at between \$100 and \$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.

SECTION 2

PRIVACY STATEMENT

Why we collect your personal information

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.

Collecting and disclosing your personal information

We may disclose your personal information to anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties such as a complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

We may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Halpin Wealth Partners is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations.

We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy, which is available at: www.halpinwealth.com.au.

SECTION 3

ARE YOU SATISFIED?

What to do if you have any concerns about our services

Both we and Halpin Wealth Partners endeavour to provide you with quality financial advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

- 1.) Have a read of our complaints policy, which you can access on our website via the following link: [Complaints Policy](#).
- 2.) Contact us about your concern. You may do so by speaking to your adviser or provisional adviser, or you can contact Halpin Wealth Partners by:

Writing to: Complaints Manager
Halpin Wealth Partners Pty Ltd
GPO Box 2005
Adelaide SA 5001

Email: advice@halpinwealth.com.au

We will try and resolve your complaint quickly, fairly and within prescribed time frames.

- 3.) If an issue has not been resolved to your satisfaction within 30 days, you have the right to refer the matter to the Australian Financial Complaints Authority (AFCA). AFCA provides 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)
Writing to: Australian Financial
Complaints Authority (AFCA)
GPO Box 3
Melbourne VIC 3001

Compensation Arrangements

We have arrangements in place to maintain adequate professional indemnity insurance as required by s912B of the Corporations Act. This insurance provides cover for claims made against us and/or 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.

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Financial Services Guide

Part 2 (Adviser and Provisional Adviser Profile)

4 August 2023 (Version 2.2)

PART 2 (Adviser and Provisional Adviser Profile)

Part 2 (Adviser and Provisional Adviser Profile) contains the following sections:

- About Your Adviser or Provisional Adviser (Section 1);
- The Services I Provide (Section 2);
- Remuneration and benefits (Section 3).

This document is Part 2 (Adviser and Provisional Adviser Profile) of the Financial Services Guide, and should be read together with Part 1, dated 4 August 2023. Part 2 sets out specific details about me as a Representative or Authorised Representative of Halpin Wealth Partners Pty Ltd ('Halpin Wealth Partners'), and my employer.

I am authorised by Halpin Wealth Partners to provide the financial services described in Part 1 and Part 2 (Adviser and Provisional Adviser Profile) of the FSG.

I have also been authorised by Halpin Wealth Partners to distribute this FSG.

Halpin Wealth Partners Pty Ltd ('Halpin Wealth Partners') ABN 72 633 241 068, holder of Australian Financial Services Licence No. 517210 ('AFSL').

You may contact us by using any of the contact details listed in the Part 1 FSG on page 2.

In this document, the terms 'I', 'me', 'us', 'we' and 'our' refer to Halpin Wealth and the financial advisers or provisional advisers listed.

SECTION 1

ABOUT YOUR ADVISER or PROVISIONAL ADVISER

Halpin Wealth

Halpin Wealth is an Authorised Representative (No. 331222) of Halpin Wealth Partners.

'Halpin Wealth' is the registered business name of the partnership of trusts operating under the trading name of Halpin Financial Services ABN 59 709 766 877 and is the providing entity for advice provided as outlined in this Financial Services Guide (FSG).

The individual Representatives and Authorised Representatives

The following individual Representatives or Authorised Representatives are financial advisers who are authorised by Halpin Wealth Partners to provide you with the financial products and services described in Part 1 of the FSG on behalf of Halpin Wealth Partners.

Heath Visser, Representative (No. 239856). Heath is a Partner of Halpin Wealth, and Director of Halpin Wealth Partners.

Michael Hart, Representative (No. 331250). Michael is a Partner of Halpin Wealth, and a Director of Halpin Wealth Partners.

Brendan Atkins, Representative (No. 239701). Brendan is a Partner of Halpin Wealth, and a Director of Halpin Wealth Partners.

Jane Gun, Representative (No. 295262). Jane is a Partner of Halpin Wealth, and a Director of Halpin Wealth Partners.

Michael Smith, Representative (No. 295750). Michael is a Partner of Halpin Wealth, and a Director of Halpin Wealth Partners.

Samuel Nunn, Authorised Representative (No. 1001668). Sam is a Partner of Halpin Wealth, and a Director of Halpin Wealth Partners.

Benjamin Sutherland, Authorised Representative (No. 388182). Benjamin is an employee of Halpin Wealth.

Alicia Langton, Authorised Representative (No. 1252002). Alicia is an employee of Halpin Wealth.

Jason Mudge, Authorised Representative (No. 242730). Jason is an employee of Halpin Wealth.

Lin Carey, Authorised Representative (No. 1263264). Lin is an employee of Halpin Wealth.

Patrick Sutherland, Authorised Representative (No. 1295547). Patrick is an employee of Halpin Wealth.

Kathryn Liebezeit, Authorised Representative (No. 245498). Kathryn is an employee of Halpin Wealth.

Jordan Kitto, Authorised Representative (No. 1271607). Jordan is an employee of Halpin Wealth.

The following individual Authorised Representative is a Provisional adviser who is authorised by Halpin Wealth Partners to provide you with the financial products and services described in Part 1 of the FSG on behalf of Halpin Wealth Partners.

Nikki (Nicole) Eddy

Nicole is a Provisional Adviser, and currently undertaking a Professional Year of supervised work and training.

Nicole is an employee of Halpin Wealth and her Authorised Representative Number issued by ASIC is 1305045.

Nicole's training and education is being actively supervised by Jane Gun, who is a Partner of Halpin Wealth. Jane is located in our Adelaide office and may be contacted via the contact details listed on page 2, in Part 1 of this FSG. We encourage you to contact Jane if you would like to provide any feedback about Nicole or the advice and services that Nicole has provided to you.

Jane will continue to supervise Nicole as she completes the required work and activities to be recognised as a fully qualified advice professional. Jane is also responsible for any personal advice given by Nicole while she undertakes her Professional Year

Nicole is currently undertaking a Master of Business Administration (Finance) and has achieved the following financial planning accreditations:

- Successfully completed the Financial Adviser Exam
- Master of Finance (Financial Planning)
- Bachelor of Applied Finance

Does your adviser or provisional adviser have any associations or relationships?

All associations and relationships are detailed in Part 1 of this FSG.

SECTION 2

THE SERVICES I PROVIDE

What areas is your adviser or provisional adviser authorised to provide advice on?

Heath Visser, Michael Hart, Brendan Atkins, Michael Smith, Benjamin Sutherland, Jane Gun, Samuel Nunn, Alicia Langton, Jason Mudge, Lin Carey, Patrick Sutherland, Kathryn Liebezeit, Jordan Kitto and Nikki (Nicole) Eddy (provisional adviser) are authorised by Halpin Wealth Partners to provide general and personal

advice and deal in financial products and services, including advice or services in the following areas:

- Deposit and payment products (basic and non-basic deposit products);
- Government debentures, stocks or bonds
- Interests in managed investment schemes including investor directed portfolio services
- Retirement savings account products
- Superannuation products and Retirement Income streams
- Self-managed superannuation funds
- Life investment and life risk insurance products
- Listed securities including direct equities and listed income securities

In addition, Brendan Atkins, Michael Smith, Samuel Nunn, Jason Mudge and Kathryn Liebezeit are authorised to provide advice or services in the area of:

- Standard margin lending facility

Are there any services your adviser or provisional adviser is not authorised to provide?

Heath Visser, Michael Hart, Benjamin Sutherland, Jane Gun, Alicia Langton, Lin Carey, Patrick Sutherland, Jordan Kitto and Nikki (Nicole) Eddy are not authorised to provide advice or services in the following areas:

- Standard margin lending facility

In providing our services, other financial matters may arise, however, we are not authorised to assist with any financial and products and services except those explained above. You should seek specific advice from the appropriate professionals on other matters relevant 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 Financial Services Guide, or any other questions relating to the terms on which we will be acting, please contact us.

How can you provide your instructions to me?

You may provide instructions to me by using any of the contact details provided in Part 1 of this FSG on page 2.

SECTION 3

Remuneration and benefits

All fees and commissions (including referral fees, other benefits and alternative remuneration) disclosed in Part 1 of the FSG which are attributable to the services provided to you by your financial adviser or provisional adviser are paid to Halpin Wealth Partners, who then pay up to 100% of those fees and commissions to Halpin Wealth for distribution as directed by the Partners of Halpin Wealth.

Partners or shareholders of Halpin Wealth and may be entitled to a monthly distribution of profits.

Employees of Halpin Wealth receive a salary.

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