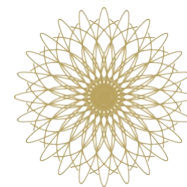


Compliance Policy

Continuing Professional Development Plan



ENTRUST

1. Purpose

The Corporations Act 2017 requires that all individuals identified as a 'relevant provider' meet the requirements for continuing professional development set by the Standards Body (s921B(5)). Additionally, it is a requirement under the FASEA Code of Ethics that: 'you must develop, maintain and apply a high level of relevant knowledge and skills'.

This CPD Plan outlines the procedures/processes in place to assist relevant providers of Entrust Private Wealth Management Pty Ltd ('Entrust') to satisfy the above obligations.

2. Annual Training Plans

Training plans will be established and reviewed annually by the compliance department and commence on 1 January each year. The plans will take into consideration the types of advice provided by the relevant provider as well as areas for improvement.

3. Requirements

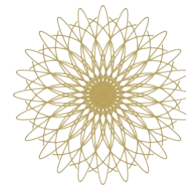
Each Relevant Provider will be required to complete a minimum of 40 CPD hours in each CPD year. This is broken down to the following areas. Please note that the hours allocated to each category satisfy minimum requirements outlined by FASEA.

FASEA category	Minimum hours per category	Annual Requirement - Hours
Technical competence	5	11
Client care & practice	5	5
Regulatory compliance & consumer protection	5	9
Professionalism & ethics	9	9
General	6 *	6*
Total	30	40

*can include up to but not more than 4 hours of professional and technical reading in a CPD year

Training required within each of the categories above may be further broken down into specific knowledge areas to assist relevant providers in completing training that is relevant to their specific roles. For example, under technical competence a relevant provider may be required to complete a minimum of 1 CPD hour in superannuation. Such requirements will be detailed in the annual CPD plans.

To assist relevant providers in meeting their CPD requirements, Entrust provides access to the Kaplan online CPD system. All CPD activities within the Kaplan online platform have been approved by Entrust given Kaplan's accreditation process. CPD hours obtained external to Kaplan will need to be approved by Entrust (refer to the 'Approval of CPD Activities') and manually entered to Kaplan and verified by compliance. All CPD will be recorded through the Kaplan system and records will be kept for a minimum of 7 years from the end of each CPD year.



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Types of CPD include:

- Formal relevant education up to a maximum of 30 CPD hours per year
- Non-formal education including:
 - Education for the purposes of achieving a relevant professional designation (e.g. CFP, FChFP etc)
 - Education for the purposes of meeting requirements in specific financial advice provisions (e.g. stockbroking, SMSF, aged care)
 - Education for the purposes of accreditation in specific forms of financial products relevant to licensing arrangements (e.g. superannuation)
 - Other CPD approved by the AFSL (sessions, workshops, PD days which are relevant to financial advice) – approved CPD and Technical reading up to a maximum of 4 hours per annum – approved CPD.

4. Licensee Self-Assessment approach

The AFSL will refer to the FASEA principles guide to enable consistency within the Licensee self-assessment approach. In assessing CPD, licensees are required to consider:

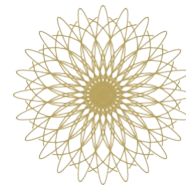
1. The level of expertise of the CPD provider
2. Expertise of facilitators and/or those delivering the CPD
3. The level of learning undertaken
4. The stated learning outcomes for the CPD activity
5. Volume of time in undertaking the CPD activity
6. The approach for verification of learning outcomes achieved

70% of CPD must be approved by the AFSL.

5. Part Time Relevant Providers

Where a relevant provider is employed on a part-time basis for the full CPD year, after obtaining written consent from the AFSL, they must:

1. Complete at least 36 hours of CPD activity in each year.
2. Maintain a continuous, up to date and accurate record of CPD activity.
3. Relevant providers must provide CPD records to the licensee to meet their CPD year requirements.



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6. Transferring Licences

Where a relevant provider moves licensees, it is the responsibility of the relevant provider to provide evidence of compliance with FASEAs CPD requirements including proof of historical training to satisfy the 40 hours of CPD per annum requirement. Where the relevant provider moves licensees part way through an appointed training plan year, the CPD requirements within this CPD plan may be prorated based on education and training completed during that year. Where no evidence of training during that financial year has been provided, the relevant provider will be required to complete the full 40 hours CPD.

7. Career Breaks

Where a relevant provider takes a career break, the following standard will apply. The relevant provider:

- Must meet the existing adviser education requirements;
- Be able to return without additional requirements if the leave period is less than 2 years;
- For leave periods of 2 years or more, undertake appropriate CPD to ensure they upskill with the latest regulatory and licensee requirements. These requirements will be set by the licensee based on the role and historical education and training completed by the relevant provider.

8. Provisional Relevant Providers

Provisional Relevant Providers are not required to meet the CPD standards outlined above. Instead, training and education will be set by the licensee as part of the professional year to achieve relevant provider status. Once authorised as a relevant provider, Entrust may choose to pro-rata the CPD hours for the period between completion of the professional year and the end of the CPD year.

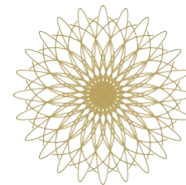
9. Extenuating Circumstances

Where extenuating circumstances are evident, the licensee has the ability to assess each circumstance at that point in time, and provide a direction to the relevant provider with regard to their ongoing training requirements. Possible extenuating circumstances may include those affected by Medical leave, disability, parental leave etc.

10. Approval of CPD activities

We have determined that approved CPD activities will be those which have been assessed as compliant by an external service provider, namely Kaplan or a similar higher education provider which will, as part of their assessment and approval, review and record the following:

- Defined learning outcomes;
- AQF mapping using the learning outcomes;
- The defined target audience (introductory, intermediate or advanced);
- Logical structure that follows adult learning principles;
- Relates to one of the FASEA CPD areas;
- The CPD content has been developed by one or more persons with appropriate expertise, academic qualifications and practical experience;



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- The CPD content has been checked by one or more persons with appropriate expertise, academic qualifications and practical experience;
- Is current, accurate and up to date;
- The CPD content deals with matters which relate to the provision of financial product advice, financial advice services and financial advice business;
- How the CPD content enhances the adviser's knowledge and skills, and/or contributes to the maintenance of knowledge and skills in areas relevant to the provision of financial product advice and financial advice services.
- The CPD content includes one or more of the following: multimedia (videos, audio, digital, etc), worked examples, activities, case studies, tips, warnings, and if appropriate reference to relevant legislation.

We rely on the CPD hours allocation as determined by Kaplan for this purpose. We rely on Kaplan appointing appropriate CPD hours based on the estimated time taken to complete all content components plus the completion of the assessment, on the basis of a 'reasonable person', with the appropriate knowledge of the defined target audience.

11. Ensuring compliance with this policy

To assist the relevant provider in achieving their ongoing training obligations as identified within this plan, the licensee provides access to the Kaplan online CPD system. In the event that the relevant provider fails to complete the required CPD hours allocated within the allocated timeframe, further review and assessment will be completed by the Compliance Department, in conjunction with the relevant providers department head, to determine what further action will be taken. In the event that the failure to complete the required CPD is identified as systemic, this may result in the allocation of a more specific and rigid CPD plan, along with additional monitoring and supervision.