

COMPLIANCE AND RISK MANAGEMENT

1. COMPLIANCE [COMPLEX APPLICATIONS]

1.1. Will the applicant have a compliance committee?

- ☐ Yes – At a minimum, how regularly will the compliance committee meet?
- ☐ Weekly
- ☐ Monthly
- ☐ Quarterly
- ☐ Half yearly
- ☐ Annually
- ☐ Less than once a year
- ☐ No

1.2. Provide details of the applicant's compliance management personnel. [REVIEW AND PROVIDE DETAILS FOR ALL PERSONS INVOLVED IN THE MANAGEMENT OF COMPLIANCE]

Full Name	Job Title	Is this role outsourced? <i>If yes, provide outsourced provider's name.</i>
[insert]	[insert]	[insert]
[insert]	[insert]	[insert]
[insert]	[insert]	[insert]

1.3. Describe in detail the procedures for review of the applicant's compliance measures, including commentary on the frequency, extent, nature, and who is responsible for the review (2,000 characters). [THESE ARE ONLY TEMPLATE PROCEDURES. REVIEW AND UPDATE ACCORDINGLY]

Compliance measures will be internally reviewed by the Director, in consultation with the other Responsible Managers, on an annual basis to ensure they continue to be adequate to the size and nature of the business:

- as the business develops and the nature of the business changes;

- in accordance with [insert defined company name]'s Compliance Manual, which sets out the procedures to be conducted to confirm compliance with the Corporations Act, [insert defined company name]'s AFS Licence conditions and internal policies; and
- when there is some relevant regulatory or legislative change. In order to keep abreast of legislative changes and industry issues, the Director will liaise regularly with [insert defined company name]'s lawyers, auditors, compliance consultants, regulatory bodies and peers. The Director will provide, or procure the provision of, education and training to staff and promote appropriate external training to employees. Senior management will advise staff of legislative changes and other industry issues when they arise.

In addition, [insert defined company name] intends to appoint an external service provider to undertake a review of compliance procedures and measures on an annual basis. As part of this review, the effectiveness of compliance monitoring will also be assessed. The findings of the external review will be discussed with the Director. Breaches will be reported to ASIC when required. [insert defined company name] will also instruct its auditors to report any deficiencies in the compliance measures which they identify when conducting the financial audit.

1.4. **Describe the frequency, content and nature of the applicant's compliance reporting (2,000 characters). [THIS IS AN EXAMPLE TEMPLATE PROCEDURES. REVIEW AND UPDATE ACCORDINGLY.]**

Internal compliance procedures will be integral to [insert defined company name]'s operations. The Director and Responsible Managers will monitor ongoing day-to-day compliance, including daily reporting in respect of dealer activities by dealers to the Head of Dealing and escalation of unusual activities to the Responsible Managers where necessary. All staff have clear reporting lines within their respective teams.

[insert defined company name] will maintain a written record of its compliance activities in addition to any matters which are recorded in the Breach Register. Where [insert defined company name] has an obligation to report a breach to ASIC, a formal report will be made.

The Director will prepare a compliance report on a quarterly basis. The report will include details of compliance reviews undertaken and the results, progress on issues identified in previous compliance reviews and external reviews, reporting any breaches and action taken to address the breaches, education and training conducted during the reporting period and any other compliance activities.

Compliance measures will be reviewed by the Director on an annual basis to ensure they continue to be adequate to the size and nature of the business. In addition, it is intended that an external service provider will undertake a review of compliance procedures and measures on a regular basis and provide a report to the Director.