

**CPD Policy of Australian Financial Services Licensee (AFSL)
F D Browne & Co Pty Ltd (effective 28/03/2019)**

For the purposes of compliance with “Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018” (as amended from time to time) (“the Legislative Instrument”).

CPD Year	The AFSL’s CPD year shall be from 1 July to 30 June of each Financial year, except initially it will be for 18 months from 1 January 2019 to 30 June 2020 to comply with legislation.
Our approach to CPD	Our approach shall be to (i) set reasonable CPD requirements for each of our relevant providers and (ii) actively assess performance against those requirements throughout the year.
POLICY SPECIFICS	
Returning from breaks	If a relevant provider returns to work after a break their CPD Plan shall be drawn so as to pro-rate requirements for the relevant year of return according to the calendar month of return to work.
Monitoring implementation of CPD plans	Each quarter (as a minimum) we will assess performance towards CPD goals. If we form the view that unacceptable gaps have developed or look likely to develop, we will caution the relevant provider (RP) to attend to their CPD more promptly and monitor them monthly for the following quarter.
Assessing and approving a minimum of 70% of CPD activities for each RP	For the purpose of section 8 of the Legislative Instrument the AFSL will annually assess and approve a minimum of 70% of each of its relevant provider’s CPD for them to complete as part of their CPD Plan as qualifying CPD activities as defined by section 7 of the Legislative Instrument.
Ensuring completion of these CPD activities by each RP	The AFSL regularly (at least quarterly) assesses completion of CPD activities in pursuit of each of its relevant provider’s CPD Plans.

Checking compliance with CPD Policy and the Legislative Instrument	Each year the AFSL will assess this CPD Policy document and determine the extent to which it is complying with the Legislative Instrument.
Recording and maintaining evidence of completion of and outcomes of qualifying CPD activities	<p>The AFSL will record and maintain evidence of completion of, and the outcomes of, qualifying CPD activities.</p> <p>In addition, all non-qualifying CPD activities will also be tracked and reviewed.</p>
Ensuring all records required are completed and maintained	<p>The AFSL will ensure that records required by this legislative instrument are completed and maintained.</p> <p>Those records shall be:</p> <ol style="list-style-type: none"> 1. Details of all CPD assessments 2. All CPD Plans 3. Details of all CPD activities
Publication of our CPD Policy	<p>The AFSL will publish a copy of its CPD on any website that it operates or maintains as part of its AFSL business.</p> <p>The AFSL will also ensure that all of its RPs have access to a copy of this CPD Policy at all times.</p>
Relevant Provider CPD Plans	<p>The AFSL will develop a CPD Plan for each of its RPs prior to the commencement of each RP's CPD Year.</p> <p>Each CPD plan shall:</p> <p>Identify areas for improvement in, and development and extension of, the RP's competence, knowledge and skills; and</p> <p>Describe the qualifying CPD activities the RP will complete during the CPD year to achieve those improvements.</p>

Minimum CPD	Our minimum expectation is that each RP will complete 40 hours of CPD (at least 70% of which is deemed qualifying CPD activities) per CPD year.
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