NEWELL PALMER SECURITIES PTY LTD

Effective date: 01 October 2025 Version 2

Training co-ordinator: Jessica Suyani

Preamble

As an Australian Financial Services Licensee who has a licence to provide personal financial advice to retail clients, we are required to have in place a CPD Policy for the individuals who provide that personal advice on our behalf. The legislation has very specific requirements and our Policy is designed to address those requirements. In this Policy 'our' and 'we' refers to all parties.

Training Year

Our training year commences on 1 July each year. Each representative must have an Individual Training Plan for the relevant year which must be approved by us. These Training Plans will be recorded in the Kaplan Ontrack system. The representative must also record completed training and provide it to us for verification when requested to do so. Those representatives who do not complete the required training are to be reported for non-compliance to ASIC.

Content of training

Training must cover the following competencies and minimum hours in each category:

CPD Area	**Minimum hours**	**Content required for approval**
Technical competence	5	The activity is designed to enhance participants' technical proficiency and ability to develop and provide advice strategies that are appropriate to the objectives, financial situations and needs of different classes of retail clients.
Client care and practice	5	The activity is designed to enhance participants' ability to act as a client-centric practitioner in advising retail clients.
Regulatory compliance and consumer protection	5	The activity is designed to enhance participants' understanding of applicable legal obligations and how to comply with them.
Professionalism and ethics	9	The activity is designed to enhance participants' capacity to act as an ethical professional.
Tax (financial) Advice	5	The activity is designed to enhance participants' understanding of tax implications and obligations when advising clients on financial products.
General	No minimum set	The activity is designed to maintain and extend participants' professional capabilities, knowledge and skills, including keeping up to date with regulatory, technical and other relevant

		developments, but is not in an area referred to in another item of this table.

The number of hours to be completed by all Representatives in a training year must total a minimum of 40 hours and all specific Knowledge Targets must also be met.

You are permitted 4 hours of professional reading towards your minimum of 40 hours. We require that you record reading with the following detail:

1. Title of article
2. Publication
3. Date
4. Author
5. Topics covered.

Although representatives are responsible for developing their training plans to assist you, we will provide a training plan which will include areas where we believe improvement is required and it will be based on CPD activities that we have approved. If a representative wants to amend the training plan they must seek approval from us and our approval will not be unreasonably withheld as long as the plan meets the minimum requirements as set out in Table above, sets out the areas for improvement and the overall total of required hours.

Approved CPD Activities

The session must clearly include content specific to the area of competency in Table above. It is to be presented by a suitably qualified person on the subject matter. It must contain an assessment to confirm the understanding of the subject matter by the representative.

The method of delivery can be face to face (such as an industry/association PD Day), or online through written communication or video/streaming (such as provided by Kaplan Ontrack), or through a published paper issued by Newell Palmer Securities (NPS) Pty Ltd or approved by us even though issued by an industry association or educational institution.

If a representative finds training material that may benefit other representatives in the group, the representative can submit it to us for consideration as an Approved CPD Activity.

The following will be taken into consideration when we assess a CPD Activity:

a) the activity is in one of the CPD areas in the Table above;
b) the activity has sufficient intellectual or practical content; Is the appropriate learning level and has appropriate technical or practical content:
    i. Clearly defined aims and learning outcomes;
    ii. Clearly defined, logical structure that follows adult learning principles;
    iii. Is current, accurate and up-to-date;
c) the activity primarily deals with matters related to the provision of financial product advice and the associated business activities;
d) the activity is led or conducted by one or more persons who are appropriate, and have sufficient standing, expertise, academic qualifications and practical experience;
e) the activity is designed to enhance relevant providers' knowledge and skills in areas that are relevant to the provision of financial product advice; and,

f) Includes one or more of the following: workshop, face-face presentation, multimedia, worked examples, activities, case studies, tips, warnings, and if appropriate, reference to relevant legislation.

We have contracted with Kaplan Professional who will provide content which will meet the above CPD Activities for the compulsory competency areas, which means that all its content is regarded as Approved CPD Activities. While we have delegated this process, we retain the responsible as the Responsible Licensee for our relevant providers.

For us to consider a CPD Activity that has not previously been approved by us that a relevant provider has attended we will need:

a) Proof of attendance/completion (e.g. certificate, digital record, transcript), which includes as a minimum:
    a. The name of the activity and the provider;
    b. The date the activity was undertaken;
    c. An overview of the activity;
    d. A bio or CV of person(s) who developed or presented the activity including academic qualifications and experience;
    e. The CPD area to which it relates;
    f. The duration in minutes/hours of the activity; and
    g. The letterhead and/or signature of the provider or an appropriate authorised person

Preference is given to activities with a structured assessment component. Evidence of the successful completion of the assessment is required.

Record Keeping

The representatives are required to retain records of:

- the qualifying CPD activities it undertakes and
- when they were undertaken and
- number of hours spent on each activity and
- evidence of completion of the activity and the outcomes of the activity and
- the progress of implementation of his or her CPD plan.

As mentioned earlier in this Policy we have contracted Kaplan Professional to provide content that meets the CPD Activities. Its online system, Ontrack also provides you and us with a training register that will record training completed through that system. Representatives will need to record other CPD Activities completed external to Ontrack and the Ontrack register has provision for that however you will need to provide evidence to support those entries to our Training Co-ordinator for Official Approval before it will be counted towards your targets.

We will periodically request, at least quarterly, records of your training completed to track that representatives are completing training that complies with our requirements. Where a representative is found not to be completing training on an ongoing basis, we will require that representative to catch up by the end of the following quarter or in the last quarter of the Training Year representatives will be required to have met all targets by the end of that quarter. Representatives who have not achieved the required training by the end of the training year, 30 June of each year, will be reported to the regulator that the standard required has not been met which in turn will be recorded on the Financial Adviser Register.