CONTINUING PROFESSIONAL DEVELOPMENT (CPD) POLICY AND PLAN

Lionsgate Financial Group
ABN 92 140 591 484
Australian Financial Services Licence No. 342766

1. PURPOSE

This Policy establishes Lionsgate Financial Group Pty Ltd's requirements for the continuing professional development (CPD) of relevant providers authorised under its Australian Financial Services Licence.

The purpose of CPD is to ensure advisers develop, maintain and apply the knowledge and skills necessary to provide competent and professional financial advice.

Lionsgate's CPD framework is designed to:

- satisfy applicable professional standards;
- maintain and develop adviser competence;
- identify and address individual development needs;
- respond to changes in legislation, regulation, products and industry practice;
- incorporate relevant findings from Lionsgate's monitoring and supervision activities; and
- support consistently high standards of financial advice.

2. APPLICATION

This Policy applies to Lionsgate relevant providers who are subject to the applicable CPD requirements.

For the purposes of this Policy, the term **adviser** generally means a relevant provider subject to those requirements.

Provisional relevant providers undertaking their professional year are subject to the applicable professional-year education and training requirements rather than the annual CPD requirements addressed by this Policy.

3. CPD YEAR

Lionsgate's CPD year is:

1 January to 31 December

Each adviser must satisfy the applicable CPD requirements within each CPD year.

CPD hours cannot be carried forward from one CPD year to another unless specifically permitted by applicable law.

4. RESPONSIBILITIES

4.1 Adviser Responsibilities

Each adviser is responsible for:

- maintaining their professional competence;
- having an appropriate annual CPD Plan;
- completing the applicable CPD requirements;
- completing CPD relevant to their advice activities and development needs;
- maintaining or providing appropriate evidence of CPD completion;
- accurately recording CPD activities;
- monitoring their progress during the CPD year;
- responding to development needs identified through Lionsgate supervision;
- completing any targeted training required by Lionsgate; and
- promptly notifying Lionsgate where they believe they may not satisfy the applicable CPD requirements.

Completion of CPD is the responsibility of the adviser.

4.2 Lionsgate Responsibilities

Lionsgate will:

- maintain this CPD Policy;
- establish appropriate CPD requirements;
- approve adviser CPD Plans;
- assess and approve qualifying CPD activities where required;
- make reasonable CPD opportunities available;
- maintain or obtain appropriate CPD records;
- monitor adviser compliance with this Policy;
- identify development needs through its supervision framework;
- require targeted CPD where appropriate; and
- take appropriate action where an adviser does not satisfy applicable CPD requirements.

5. MINIMUM CPD REQUIREMENTS

Unless an applicable exception applies, an adviser must complete a minimum of:

40 hours of qualifying CPD activities during each CPD year.

The CPD must include at least:

CPD Area	Minimum Hours
Technical Competence	5 hours

CPD Area	Minimum Hours
Client Care and Practice	5 hours
Regulatory Compliance and Consumer Protection	5 hours
Professionalism and Ethics	9 hours

Where an adviser is a **qualified tax relevant provider** and provides tax (financial) advice services to retail clients, the adviser must also satisfy the applicable tax (financial) advice CPD requirement.

The remaining CPD hours may be completed across appropriate CPD areas having regard to the adviser's role, authorisation and development needs.

6. PART-TIME ADVISERS

In special circumstances, an adviser who works part-time for the whole CPD year may apply to Lionsgate for a reduced minimum CPD requirement.

Where Lionsgate provides prior written consent, the minimum may be reduced to:

36 hours.

Any applicable minimum requirements within individual CPD areas continue to apply.

A reduced requirement is not automatic merely because an adviser works part-time.

The adviser must obtain Lionsgate's written approval.

7. LIONSGATE-APPROVED CPD

At least **70% of the applicable minimum CPD hours** must consist of qualifying CPD activities approved by Lionsgate.

For an adviser subject to the standard 40-hour requirement, this means at least:

28 hours of Lionsgate-approved qualifying CPD.

An activity may be approved:

- before completion;
- as part of an approved CPD program;
- through an approved training provider; or
- following assessment by Lionsgate where appropriate.

Advisers should not assume that an activity will qualify for CPD merely because a training provider describes it as CPD.

Where uncertain, obtain confirmation from Lionsgate.

8. QUALIFYING CPD ACTIVITIES

An activity should only be treated as qualifying CPD where it:

- relates to an appropriate CPD area;
- contains sufficient intellectual or practical content;
- is relevant to financial advice, financial advice services or the financial advice business;
- is designed to maintain or enhance relevant professional knowledge or skills; and
- where applicable, is delivered by a person or organisation with appropriate expertise, qualifications, standing or practical experience.

The existing Lionsgate policy applies substantially these criteria to qualifying activities.

9. CPD AREAS

9.1 Technical Competence

Activities designed to enhance technical knowledge and the ability to develop and provide appropriate advice strategies.

Examples may include:

- superannuation;
- retirement planning;
- investments;
- insurance;
- taxation relevant to financial advice;
- social security;
- aged care;
- estate-planning considerations;
- portfolio construction; and
- technical strategy development.

9.2 Client Care and Practice

Activities designed to improve the adviser's ability to act as a client-centric practitioner.

Examples may include:

- client discovery;
- Fact Find quality;
- goals and objectives;
- scope;
- risk profiling;
- capacity for loss;
- client communication;

- vulnerable clients;
- advice presentation;
- file notes; and
- advice documentation.

9.3 Regulatory Compliance and Consumer Protection

Activities designed to improve understanding and application of legal and regulatory obligations.

Examples may include:

- best interests obligations;
- SOA and ROA requirements;
- ongoing fee arrangements;
- complaints;
- breach reporting;
- DDO;
- privacy;
- conflicts;
- FSG requirements;
- record keeping; and
- regulatory developments.

9.4 Professionalism and Ethics

Activities designed to enhance the adviser's capacity to act as an ethical professional.

This may include:

- ethical decision-making;
- professional judgement;
- conflicts;
- client interests;
- professional conduct;
- ethical case studies; and
- application of applicable ethical standards.

9.5 General

Other relevant activities may qualify where they maintain or extend the adviser's professional capability, knowledge or skills but do not fall primarily within another CPD area.

10. PROFESSIONAL OR TECHNICAL READING

Professional or technical reading may qualify as CPD where it satisfies applicable requirements.

A maximum of:

4 hours per CPD year

may be counted for professional or technical reading.

Examples may include appropriate:

- regulatory publications;
- technical publications;
- professional journals;
- legislative updates;
- technical research; and
- industry publications.

Routine reading of emails, newsletters, advertisements or general news should not automatically be treated as qualifying CPD.

11. FORMAL EDUCATION

Relevant formal education may qualify for CPD.

This may include:

- university study;
- approved qualifications;
- professional designations;
- formal technical courses; and
- education or training provided or approved by an appropriate professional body.

Applicable limits on the amount of formal education that may count toward annual CPD requirements must be observed.

12. NO DOUBLE COUNTING

An activity may potentially relate to more than one CPD area.

However, the same CPD time must not be counted twice.

The activity should generally be allocated to the CPD area to which it predominantly relates.

For example, a two-hour training session cannot be recorded as:

2 hours Technical Competence

and

2 hours Regulatory Compliance

to create four hours of CPD.

13. ANNUAL CPD PLAN

Each adviser must maintain a written CPD Plan for each CPD year.

The Plan should identify:

- relevant areas for development;
- knowledge or competency gaps;
- areas in which competence should be maintained or extended;
- proposed CPD activities; and
- how those activities relate to the adviser's professional development.

The Plan should be proportionate to the adviser's role, experience, authorisation and advice activities.

14. PREPARING THE CPD PLAN

For existing advisers, the CPD Plan should generally be prepared at or around the beginning of the CPD year.

Where an adviser joins Lionsgate during the CPD year, an appropriate CPD Plan should be prepared and approved within the applicable period and generally no later than three months after commencement where required.

The Plan must be approved by Lionsgate.

15. INDIVIDUAL DEVELOPMENT NEEDS

An adviser's CPD Plan should not simply contain generic training activities.

When determining development needs, Lionsgate and the adviser may consider:

- advice areas;
- adviser experience;
- professional qualifications;
- previous CPD;
- changes to authorisation;
- reference-check findings;
- induction outcomes;
- competency assessments;
- file-review findings;
- pre-vetting findings;

- complaints;
- incidents or breaches;
- changes in legislation or regulation;
- new products or strategies;
- changes in client demographics;
- identified technical gaps; and
- other relevant supervision findings.

16. LINK TO ADVISER SUPERVISION

CPD forms part of Lionsgate's broader adviser monitoring and supervision framework.

Where Lionsgate identifies a development need through:

- file review;
- pre-vetting;
- adviser audit;
- complaint;
- incident;
- induction;
- competency assessment; or
- another supervisory activity,

Lionsgate may require targeted training to address the matter.

For example:

File Review Finding

↓

Training Point

↓

Targeted CPD / Training

↓

Subsequent Advice Review

↓

Assessment of Application

This allows Lionsgate to assess not merely whether training was completed, but whether the adviser has appropriately applied the learning in practice.

17. TARGETED LIONSGATE TRAINING

Lionsgate may require advisers to complete specified training in addition to activities selected by the adviser.

This may include training concerning:

- client discovery;
- SOA/ROA requirements;
- insurance;
- superannuation;
- investment advice;
- replacement advice;
- risk profiling;
- file notes;
- complaints;
- regulatory changes;
- ethics;
- privacy;
- cybersecurity; or
- another identified development area.

Where the activity satisfies applicable CPD requirements, Lionsgate may approve the activity for CPD credit.

18. MONITORING CPD PROGRESS

Advisers are expected to monitor their own CPD progress throughout the CPD year and avoid leaving a substantial proportion of their CPD until the end of the year.

Lionsgate may review adviser CPD progress during the year as part of its normal compliance and supervision activities.

Lionsgate is **not required under this Policy to conduct formal quarterly CPD reviews**.

Where Lionsgate identifies that an adviser may be at risk of not satisfying their CPD requirements, it may:

- contact the adviser;
- request updated CPD records;
- require additional CPD;
- establish a completion plan; or
- take other appropriate supervisory action.

19. EVIDENCE OF CPD

Appropriate evidence should be retained for qualifying CPD activities.

Depending upon the activity, evidence may include:

- certificate of completion;
- training-provider record;
- attendance record;
- assessment result;
- transcript;
- webinar completion record;
- course documentation;
- Lionsgate training record; or
- other reliable evidence.

The evidence should be sufficient to establish, where relevant:

- activity undertaken;
- date;
- duration;
- CPD area;
- provider;
- completion; and
- outcome.

20. CPD RECORDS

Complete and accurate CPD records must be maintained.

Records should include:

- CPD activity;
- date completed;
- number of hours;
- applicable CPD area;
- whether the activity was Lionsgate approved;
- evidence of completion;
- relevant outcome; and
- progress against the adviser's CPD Plan where appropriate.

Lionsgate may maintain these records on behalf of advisers, but advisers remain responsible for ensuring their CPD record is accurate.

Advisers must provide CPD records or supporting evidence to Lionsgate when requested.

21. RECORD RETENTION

CPD Plans, CPD records and relevant evidence must be retained for at least:

7 years

or longer where required by applicable law or Lionsgate's record-retention requirements.

This is consistent with the existing Lionsgate policy's seven-year CPD record requirement.

22. CAREER BREAKS

Where an adviser has not been practising or authorised for a continuous period of **two years or more**, Lionsgate will consider whether the adviser has knowledge or competency gaps arising from the period away from practice.

Before resuming practice, the adviser must have an appropriate CPD Plan approved by Lionsgate where required.

The Plan should address relevant gaps in:

- technical knowledge;
- regulatory knowledge;
- professional competence;
- industry developments;
- technology;
- products;
- advice practices; and
- other relevant areas.

Lionsgate may also require:

- induction;
- targeted training;
- competency assessment;
- pre-vetting; or
- enhanced supervision.

The existing policy already appropriately recognises the need for a tailored CPD Plan following a continuous absence from practice of two years or more.

23. CPD NON-COMPLIANCE

Advisers must immediately notify Lionsgate Compliance if they become aware that they have not met, or may not meet, an applicable CPD requirement.

The adviser must not conceal a CPD shortfall or inaccurately record activities or hours.

Where a CPD shortfall occurs, Lionsgate will assess:

- reason for the shortfall;
- extent of the shortfall;
- affected CPD categories;
- adviser circumstances;
- regulatory consequences;
- required regulatory notifications or register updates;
- remediation;
- additional training;
- supervision; and
- whether any action concerning the adviser's authorisation is required.

Completion of additional CPD after the end of the relevant CPD year does not retrospectively alter whether the applicable annual requirement was met.

24. FALSE OR INACCURATE CPD RECORDS

Advisers must not:

- claim CPD they did not complete;
- inflate CPD hours;
- double count activities;
- alter certificates;
- record attendance where they did not meaningfully participate;
- claim reading that was not undertaken; or
- otherwise provide false or misleading CPD information.

Any concern regarding the integrity of CPD records must be immediately referred to Lionsgate.

25. ANNUAL CPD COMPLETION REVIEW

Following the end of each CPD year, Lionsgate will assess whether each relevant adviser has satisfied the applicable annual CPD requirements.

The review should consider:

- total CPD hours;
- mandatory category minimums;

- applicable tax (financial) advice CPD;
- required Lionsgate-approved CPD;
- applicable activity limits;
- evidence of completion;
- CPD Plan; and
- any identified shortfall.

The outcome should be appropriately recorded.

26. CPD PLAN TEMPLATE

Adviser: ______________________________________

ASIC Adviser Number: ___________________________

CPD Year: 1 January ______ to 31 December ______

Date Plan Prepared: ____________________________

Date Approved: _________________________________

Approved By: __________________________________

Development Plan

Development Area	Reason / Development Need	Proposed CPD or Training	CPD Area	Target

Specific Development Priorities

Technical development priorities:

____

____

Client care / advice-process priorities:

____

____

Regulatory / compliance priorities:

____

____

Professionalism / ethics priorities:

____

____

Other adviser-specific development requirements:

____

____

27. CPD COMPLETION RECORD

Date	Activity	Provider	CPD Area	Hours	Lionsgate Approved	Evidence Retained
					Yes / No	Yes / No

Date	Activity	Provider	CPD Area	Hours	Lionsgate Approved	Evidence Retained
					Yes / No	Yes / No
					Yes / No	Yes / No
					Yes / No	Yes / No
					Yes / No	Yes / No

Total CPD Hours: __________

Technical Competence: __________

Client Care and Practice: __________

Regulatory Compliance and Consumer Protection: __________

Professionalism and Ethics: __________

Tax (Financial) Advice, if applicable: __________

General / Other: __________

Total Lionsgate-Approved CPD: __________

28. ADVISER DECLARATION

I confirm that:

- the CPD information recorded is complete and accurate to the best of my knowledge;
- I have completed the activities recorded;
- I have not knowingly double counted CPD hours;
- appropriate evidence has been retained or provided;
- I have notified Lionsgate of any known CPD shortfall; and
- I understand my responsibility to maintain appropriate professional competence.

Adviser Name: ________________________________

Signature: ____________________________________

Date: ____

29. LIONSGATE ANNUAL ASSESSMENT

At the conclusion of each CPD year, Lionsgate will assess the adviser's compliance with the applicable CPD requirements.

The assessment should consider:

Adviser: ______________________________

CPD Year: ______________________________

Applicable annual CPD requirement: __________ hours

Actual CPD completed: __________ hours

Technical Competence: __________ hours

Client Care and Practice: __________ hours

Regulatory Compliance and Consumer Protection: __________ hours

Professionalism and Ethics: __________ hours

Tax (Financial) Advice, if applicable: __________ hours

General / Other: __________ hours

Lionsgate-approved qualifying CPD: __________ hours

Annual Assessment

☐ Total annual CPD requirement satisfied.

☐ Minimum Technical Competence requirement satisfied.

☐ Minimum Client Care and Practice requirement satisfied.

☐ Minimum Regulatory Compliance and Consumer Protection requirement satisfied.

☐ Minimum Professionalism and Ethics requirement satisfied.

☐ Tax (Financial) Advice requirement satisfied, where applicable.

☐ Minimum Lionsgate-approved CPD requirement satisfied.

☐ Applicable activity limits have been complied with.

☐ Appropriate evidence of completion has been retained.

☐ Adviser CPD Plan was maintained.

☐ Any identified development requirements have been appropriately considered.

Overall CPD Outcome:

☐ Compliant

☐ Compliant – Development Points Identified

☐ CPD Shortfall / Further Assessment Required

Comments:

____

____

____

Assessed By: ________________________________

Date: ______________________________________

30. CPD AND ADVISER DEVELOPMENT

Satisfying the minimum annual CPD hours does not, by itself, establish that an adviser has maintained appropriate competence in every area in which they provide advice.

Lionsgate may identify additional development requirements through:

- file reviews;
- pre-vetting;
- adviser audits;
- complaints;
- incidents;
- competency assessments;
- changes in the adviser's business;
- changes in authorisation;
- regulatory developments; or
- other supervisory activities.

Where an additional development need is identified, Lionsgate may require targeted training even where the adviser has already completed their minimum annual CPD hours.

31. APPLICATION OF TRAINING

Lionsgate's objective is not simply for advisers to accumulate CPD hours.

Advisers are expected to apply relevant learning in their professional practice.

Where training has been required because of an identified development area, Lionsgate may subsequently assess whether the learning has been appropriately applied.

This may occur through:

- subsequent file review;
- pre-vetting;
- adviser discussion;
- competency assessment;
- targeted review; or
- another appropriate supervisory process.

The preferred development process is:

ISSUE IDENTIFIED

↓

TRAINING / CPD

↓

ADVISER APPLICATION

↓

SUBSEQUENT REVIEW

↓

COMPETENCY CONFIRMED OR FURTHER DEVELOPMENT

32. CPD FOR NEW ADVICE AREAS

Before an adviser begins providing advice in a materially new or more complex area, Lionsgate may require the adviser to demonstrate appropriate competence.

Depending upon the circumstances, this may include:

- relevant CPD;
- technical training;
- specialist training;
- competency assessment;
- supervised advice;
- pre-vetting; or
- other appropriate evidence of competence.

Completion of CPD does not automatically expand an adviser's authorisation.

Any required change to authorisation must be separately approved by Lionsgate.

33. LIONSGATE-MANDATED TRAINING

From time to time, Lionsgate may require advisers to complete mandatory training.

Mandatory training may arise from:

- legislative or regulatory change;
- ASIC guidance;
- changes to Lionsgate procedures;
- new or emerging compliance risks;
- systemic file-review findings;
- complaints;

- breach analysis;
- cybersecurity risks;
- changes to advice templates;
- changes to approved products;
- changes to Lionsgate policies or manuals; or
- other matters considered relevant to adviser competence.

Where the training satisfies applicable CPD requirements, appropriate CPD credit may be allocated.

Advisers must complete mandatory Lionsgate training within the timeframe specified.

34. INDIVIDUAL TARGETED TRAINING

Lionsgate may require an individual adviser to complete targeted training where a particular development need has been identified.

For example:

File review finding: Inadequate consideration of capacity for loss.

Targeted training: Risk profiling and capacity-for-loss training.

Or:

File review finding: Weak documentation supporting insurance recommendations.

Targeted training: Insurance needs analysis and advice-documentation training.

Or:

File review finding: Incorrect use of an ROA.

Targeted training: SOA/ROA classification and evidence training.

Targeted training should be proportionate to the nature and significance of the identified development area.

35. RELATIONSHIP WITH FILE REVIEWS

Where a file review identifies a Training Point, Lionsgate may determine that:

- adviser feedback is sufficient;
- the matter should be incorporated into the adviser's CPD Plan;
- targeted training is required;
- a competency assessment is required; or
- subsequent files should be reviewed to assess whether the learning has been applied.

Not every Training Point requires a formal CPD activity.

The supervisory response should be proportionate to:

- seriousness;
- recurrence;
- potential client impact;
- adviser's experience;
- previous training; and
- nature of the development need.

36. CPD APPROVAL PROCESS

Where an adviser wishes to undertake CPD that has not already been approved by Lionsgate, the adviser may submit the activity for approval.

Information provided should be sufficient for Lionsgate to assess:

- activity title;
- training provider;
- content;
- duration;
- learning objectives;
- presenter qualifications or experience where relevant;
- proposed CPD area; and
- evidence of completion that will be available.

Lionsgate may:

- approve the activity;
- approve a different number of hours;
- allocate the activity to a different CPD area;
- request additional information; or
- decline to recognise the activity as qualifying CPD.

37. CPD PROVIDED BY LIONSGATE

Lionsgate may provide CPD through activities including:

- adviser training sessions;
- technical workshops;
- compliance training;
- case studies;
- adviser development programs;

- competency assessments;
- regulatory updates;
- specialist presentations;
- structured adviser meetings; and
- targeted remedial training.

Not every Lionsgate meeting or communication automatically constitutes CPD.

An activity should only be recorded as CPD where it satisfies the applicable qualifying-activity requirements.

38. CPD FROM PRODUCT PROVIDERS

Training provided by product issuers, platforms, insurers, fund managers or other commercial providers may qualify for CPD where the activity satisfies the applicable requirements.

Advisers should consider whether the activity:

- contains sufficient intellectual or practical content;
- genuinely develops professional competence;
- is relevant to the adviser's practice; and
- is more than product promotion or marketing.

Attendance at a promotional presentation does not automatically constitute qualifying CPD.

39. CPD PLAN CHANGES DURING THE YEAR

The annual CPD Plan is intended to guide professional development but does not need to remain unchanged throughout the year.

The Plan may be updated where:

- a new development need is identified;
- file-review findings arise;
- the adviser's role changes;
- authorisation changes;
- new advice areas are introduced;
- regulatory requirements change;
- previously planned training becomes unavailable; or
- another relevant circumstance arises.

Material changes should be appropriately recorded.

40. ADVISER RESPONSIBILITY FOR CPD STATUS

Advisers should know their own CPD position.

An adviser should not rely solely upon Lionsgate to notify them that:

- hours are outstanding;
- a category minimum has not been met;
- evidence is missing; or
- the CPD year is approaching its end.

Where an adviser identifies a potential shortfall, they should notify Lionsgate promptly so that the position can be assessed before year-end where possible.

41. SPECIAL CIRCUMSTANCES

Where exceptional circumstances affect an adviser's ability to complete CPD, the adviser should notify Lionsgate as early as reasonably practicable.

Lionsgate will consider the circumstances and determine what action is available or required under the applicable professional standards.

Lionsgate will not assume that it has discretion to waive a statutory CPD requirement unless that discretion is available under the applicable requirements.

42. POLICY BREACHES

A failure to comply with this Policy may result in supervisory or other action.

Depending upon the circumstances, Lionsgate may require:

- additional CPD;
- targeted training;
- competency assessment;
- increased supervision;
- pre-vetting;
- restrictions on authorisation;
- formal remedial action; or
- other appropriate action.

Serious, deliberate or repeated non-compliance may result in review of the adviser's continuing authorisation.

43. POLICY REVIEW

Lionsgate will periodically review this Policy and update it where appropriate having regard to:

- legislative changes;
- regulatory developments;
- ASIC guidance;
- professional standards;

- changes to Lionsgate's business;
- supervision findings; and
- identified compliance risks.

The current approved version of this Policy should be made available to relevant advisers.

44. FINAL CPD PRINCIPLE

Lionsgate's CPD framework is intended to support genuine professional development rather than merely accumulation of training hours.

Each adviser should be able to demonstrate:

WHAT DO I NEED TO KNOW?

WHERE DO I NEED TO IMPROVE?

WHAT TRAINING WILL ADDRESS THAT NEED?

HAVE I COMPLETED THE REQUIRED CPD?

HAVE I APPLIED WHAT I LEARNED?

IS THERE ANY DEVELOPMENT NEED I SHOULD ESCALATE?

LIONSGATE CORE CPD PRINCIPLE

PLAN DEVELOPMENT.

COMPLETE RELEVANT CPD.

KEEP EVIDENCE.

ADDRESS IDENTIFIED GAPS.

APPLY THE LEARNING.

ESCALATE SHORTFALLS EARLY.