



**ASIC**  
Australian Securities &  
Investments Commission

## CEU interim compliance report by ASIC

ASIC's interim report dated **03/12/2018** on compliance with the s93AA ASIC Act court enforceable undertaking (CEU) given by **AIW Dealer Services Pty Ltd** (ACN 153 322 420) **dated 14 December 2017**.

Terms used in this report have the same meaning as in the CEU dated 14 December 2017.

<b>Undertakings</b>	<b>Report on compliance</b>
<b>Engagement of the Independent Expert</b>  CEU paragraph 8.1-8.5	<ul style="list-style-type: none"><li>• AIW Dealer Services requested ASIC to approve the engagement of an Independent Expert and the draft terms of engagement for that expert.</li><li>• Following ASIC's approval of the Independent Expert and terms of engagement, AIW Dealer Services engaged the Independent Expert within the time specified by the CEU.</li><li>• AIW Dealer Services has engaged the Independent Expert in accordance with the Terms of Engagement as specified in the CEU.</li></ul>
<b>Role of the Independent Expert</b>  CEU paragraph 9.1-9.4	<ul style="list-style-type: none"><li>• AIW Dealer Services engaged the Independent Expert to prepare a Policy and Procedure Review of the effectiveness of AIW's policies and procedures.</li><li>• AIW agreed to the Policy and Procedure Review delivery to be provided at the same time as the Policy and Procedure Report.</li><li>• The Policy and Procedure Review was completed at a later date together with the Policy and Procedure Report. The Policy and Procedure Report was completed on time and in accordance with the CEU.</li></ul>

Undertakings	Report on compliance
<p data-bbox="193 237 464 331"><b>Policy &amp; Procedure Remedial Actions</b>[description]</p> <p data-bbox="193 367 395 427">CEU paragraph 9.5-9.8</p>	<ul data-bbox="496 248 1385 640" style="list-style-type: none"> <li data-bbox="496 248 1385 383">• AIW Dealer Services undertook to prepare a <b>Policy and Procedure Remedial Action Plan</b> in accordance with the recommendations set out in the Policy and Procedure Report.</li> <li data-bbox="496 405 1385 539">• AIW provided the <b>Policy and Procedure Remedial Action Plan</b> to ASIC and the Independent Expert within the time frame specified by the CEU.</li> <li data-bbox="496 562 1385 640">• AIW is currently implementing the <b>Policy and Procedure Remedial Action Plan</b>.</li> </ul>
<p data-bbox="193 696 464 790"><b>Client Files- Review and Remediation Program</b></p> <p data-bbox="193 826 395 887">CEU paragraph 10.1-10.3</p>	<ul data-bbox="496 707 1385 1249" style="list-style-type: none"> <li data-bbox="496 707 1385 842">• AIW Dealer Services provided a <b>Review and Remediation Program</b> to the Independent Expert and ASIC within the time frame specified by the CEU.</li> <li data-bbox="496 864 1385 999">• The Independent Expert undertook to provide feedback on the effectiveness of the proposed program and provide comments to ASIC and AIW.</li> <li data-bbox="496 1021 1385 1099">• AISC provided some feedback on the <b>Review and Remediation Program</b>.</li> <li data-bbox="496 1122 1385 1249">• AIW has made the necessary modifications to the <b>Review and Remediation Program</b> as required and within the timeframe specified in the CEU.</li> </ul>
<p data-bbox="193 1305 464 1400"><b>Client Files- Review and Remediation Report</b></p> <p data-bbox="193 1435 395 1496">CEU paragraph 10.4-10.5</p>	<ul data-bbox="496 1317 1385 1451" style="list-style-type: none"> <li data-bbox="496 1317 1385 1451">• AIW Dealer Services is currently implementing the Review and Remediation Program with a subsequent report and action plan to be provided to ASIC</li> </ul>