

ASIC's final report dated 13 May 2019, on compliance with the section 93AA of the ASIC Act court enforceable undertaking (CEU) given by Wealthsure Financial Services Pty Ltd (ACN: 130 288 578) (WFS) dated 29 April 2015.

Terms used in this report have the same meaning as used in the 29 April 2015 CEU.

ASIC now considers all the requirements specified in the CEU to be satisfied.

| Undertakings | Report on Compliance |
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| <p>Appointment of Independent Expert CEU paragraphs 3.2 - 3.12</p> | <ol style="list-style-type: none"> 1. WFS maintained the appointment of Deloitte Touche Tohmatsu (Deloitte) as its Independent Expert in accordance with paragraphs 3.2-3.4 of the Wealthsure Group CEU. 2. Prior to engaging Deloitte as its Independent Expert, WFS sought and received approval from ASIC for Deloitte to be appointed on the basis that Deloitte had the required expertise. 3. Deloitte had the expertise and was able to perform the tasks necessary to fulfil the obligations imposed by the Undertaking. 4. WFS provided ASIC with a copy of the terms of engagement with Deloitte, which were approved by ASIC. |
| <p>WFS's Implementation of the Remediation Plan CEU paragraph 3.15-3.17</p> | <ol style="list-style-type: none"> 1. The Independent Expert has confirmed that WFS has completed all actions required under the Remediation Plan and the completeness of those actions have been tested in the Interim Reports. 2. WFS met with ASIC at times agreed by ASIC. |
| <p>Independent Expert Interim Reports CFU paragraph 3.20-3.26</p> | <ol style="list-style-type: none"> 1. WFS provided Independent Expert Interim Reports to ASIC dated: <ol style="list-style-type: none"> 1.1. 17 April 2015 1.2. 16 October 2015 1.3. 15 April 2016 1.4. 14 October 2016 1.5. 25 October 2017 (CEU specifies 20 October however a later date was agreed to by ASIC on 20 October 2017). 2. The Independent Expert reported a number of findings in relation to the completeness of the Remediation Plan, adequacy of controls, operational effectiveness of completed actions, recommendations for improvement, status of issues discussed in Remediation Review Meetings and summary of Authorised Representative Audit Report review. 3. The Independent Expert made a number of recommendations in relation to the actions taken by WFS to implement the Remediation Plan during the course of the CEU. The Independent Expert has confirmed that WFS implemented each of these recommendations to its satisfaction. |
| <p>Independent Expert Final Report CEU paragraphs 3.27</p> | <ol style="list-style-type: none"> 1. The Independent Expert Final Report was submitted to ASIC on 22 October 2018. The Independent Expert Final Report included a description about who assisted in their review, the most relevant documents and limitations and qualifications to the Final Report. 2. The Independent Expert Final Report explained that WFS' Licensee Compliance Framework: <ol style="list-style-type: none"> 2.1. Identifies, analyses and controls key compliance risks with consideration to the nature, scale, size and complexity of WFS' business; |

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| | <p>2.2. Adheres to the principles of ISO19600 with consideration to the nature, scale size and complexity of WFS' business; and</p> <p>2.3. Resolves ASIC's concerns detailed in paragraphs 2.21 to 2.27 of the CEU with no exceptions identified.</p> <p>3. The Independent Expert undertook an assessment of WFS' Licensee Compliance Framework as it will operate thereafter and did not identify any deficiencies.</p> <p>4. The Independent Expert did not identify deficiencies for the Independent Expert Final Report and made no recommendations to rectify deficiencies.</p> |
| CEU paragraph 3.31 | 1. WFS has not transferred any more than seven authorised representatives to Sentry or its related bodies corporate within a calendar year. |
| CEU paragraph 3.32 | 2. The Independent Expert undertook an assessment of training plans for WFS management and compliance staff and did not identify deficiencies. |
| CEU paragraphs 3.37 – 3.42 | 3. WFS were not required to submit a non-compliance notice relevant to the Final Report because there was not a failure to comply with paragraphs 3.38.1-3 of the CEU. |