

<insert company logo>

MDA PROVIDER POLICY AND PROCEDURES

<INSERT LICENSEE'S NAME>

(AFSL <INSERT AFSL NUMBER>)

SAMPLE

3. IMPLEMENTING A MDA SERVICE

3.1 Application for MDA service

USER GUIDE: Insert your procedures for receiving applications to use your MDA service.

3.2 Initial review

USER GUIDE: Include this section when the MDA adviser is not employed by or an authorised representative of the MDA provider. Even though the external MDA adviser will have recommended the MDA service to the client, before we accept the client to our MDA service, we review the MDA client’s SoA/Investment Program insofar as it relates to their proposed Investment Program to ensure that we are satisfied that there is no reason to believe that:

- The MDA contract or Investment Program is inappropriate for the client’s financial situation, needs and objectives;
- The Investment Program does not comply with the general requirements for a SoA; and
- Any statement in our FSG about the Investment Program prepared by the external MDA adviser is misleading, deceptive or likely to mislead or deceive.

The review does not need to be comprehensive or endorse the client’s Investment Program; it is only necessary to check that on face value these documents do not appear to contain anything that raises an obvious concern that the Investment Program or MDA Contract may not be appropriate for the client.

3.2.1 What to look for

The table below provides examples of issues that would raise a concern. **USER GUIDE:** List the issues that your MDA implementation team should look for when reviewing Investment Programs and why they are a concern.

Issue	Reason for Concern

3.2.2 Identifying a concern

If you have any concerns that the MDA contract or Investment Program are unsuitable for the client, email the MDA adviser and ask them to check out your concerns and confirm why they consider the MDA contract or Investment Program to be suitable.

If you believe the Investment Program does not comply with the SoA requirements, email the MDA adviser and ask them to submit a complying Investment Program.

Consult <insert job title> if you are unsure or for assistance in reviewing the SoA/Investment Program.

3.2.3 Record keeping

On receipt of an MDA application, record the fact that you have reviewed the SoA. **USER GUIDE:** Describe how and where you retain records of initial SoA reviews.

3.3 Implementation procedure

USER GUIDE: Describe your procedures for setting up a client MDA account - or refer to where they may be found NB if you hold client funds in your trust account for a period, then include 'client money' procedures - see s 981B Corporations Act 2001 (Cth).

SAMPLE