Training and Competence Scheme



GENISTAR
Financial Freedom For All

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Part 1:
Recruitment and Attaining Competence

GENISTAR
Financial Freedom For All

1) Introduction

Genistar's primary objective is to educate families in financial freedom, through reducing levels of debt, increasing understanding of financial matters, and protecting themselves against significant financial losses as a result of life events. In facilitating this process of education, Genistar also presents potential clients with; a) options to purchase non-investment protection policies, and b) opportunities to generate additional income for themselves by joining the Genistar team as a Company Representative and providing financial education to families and contacts within their own communities.

This scheme defines the knowledge and skill requirements, permitted activities and Continued Professional Development (CPD) of Genistar Introducers and Company Representatives.

The Financial Conduct Authority (FCA) publishes rules, guidance and prescribes conduct of business standards for the distribution of regulated financial protection contracts to consumers. Genistar's directors and those holding senior manager functions (SMFs) are responsible and accountable to the FCA for the practical application of these rules, guidance and standards.

In relation to training, professionalism, ethics, skills, and the supervision of practitioners, Genistar directors make a statutory declaration of commitment to take all reasonable steps to implement appropriate systems and controls and to keep records of training, monitoring and supervisory activities to ensure that all Company Representatives:

- Are deemed competent through assessments
- Remain competent and continuously develop skills and knowledge
- Are appropriately supervised
- Have their competence regularly reviewed, and
- Have a level of competence appropriate to the nature of the business / activities undertaken by each individual

Genistar's intention is to deliver a flexible, relevant technical learning and professional development framework, based on a set of principles and rules approved by the Directors and Senior Vice Presidents (SVPs), in consultation with the FCA Regulated Sales Process Steering Group, first established in 2018.

Part 1 of this document sets out the process by which Genistar recruits, assesses, and appoints new Company Representatives – the details for ongoing monitoring, and maintaining competence, are set out in part 2 of this document.

Genistar is authorised and regulated by the FCA to transact business in respect of non-investment insurance business, and currently offers the protection products of Vitality Life only. Genistar holds debt-counselling permissions purely for the purpose of being able to freely discuss the reduction and elimination of debt with clients. Genistar also has the option for clients if they would like, to be referred to a provider for services such as mortgages, savings & investments, and retirement planning.

2) The Genistar Development Path

Induction

Road to Competence	How Achieved
Mandatory Exams (modules such as compliance, product knowledge, sales process, etc)	Mixed media modules (videos, written, testing)
Mandatory Scoop and Carryback Assessments	Recruit observing an experienced Representative during client meetings/role plays, then the Recruit being observed conducting the meetings for assessment
Assessment of Initial Business Written	Pre-submission file review of initial cases by Business Integrity
Formal Sign Off/Licensing	Formal competency sign off by upline and Training Department so recruit moves to Rep level

Core

Maintaining Competence	How Achieved
Annual mandatory exams	Mixed media modules (videos, written, testing)
Annual mandatory Scoop and Carryback assessments	Discussion or observation with your coach to develop where necessary
Maintaining Competency Module (AML, GDPR, Complaints, etc)	Mixed media modules (videos, written, testing)
Annual one to one meetings with supervisor	Review progress and performance (key KPI measures, persistency, CFI, etc)
Regular file review assessments	Pre-submission file review of cases by Business Integrity. Post Sale Review
Annual 15 hours CPD	CPD is achieved through set courses and recorded internal system - monitored by upline and Training Department
Annual formal sign-off	Formal annual competency sign off by upline and Training Department

Development

Journey to AVP/EVP	How Achieved
*AVP/EVP/Management Development modules	Mixed media modules (videos, written, testing)
Business skills modules	Mixed media modules (videos, written, testing)
Assigned EVP skills coach	Group learning sessions and one to one (coach driven)
Structured personal development plan	Mixed media modules (videos, written, testing)
Business plan review	Present Business Plan prior to AVP/EVP approval level
Supervisor training	Complete company assigned supervisor training
Formal sign off to AVP/EVP level	Additional reviews with coach, meet AVP/EVP eligibility requirements, interview with Business Integrity team

**Associate Vice President*

Induction: early road to competence from first joining Genistar as a new Recruit

Core: maintaining and demonstrating competence from year to year, to ensure appropriate outcomes for customers

Development: for those looking for progression and reward, with aspirations of managing a team, there is the option to qualify for promotion to EVP on a structured pathway.

3) Recruitment

Any new lead, referral or contact has the potential to become a Genistar recruit, although the level of curiosity, interest, ability and capacity to do so will vary from person to person.

An existing Genistar Representative will have the ability to assess whether a new client has the potential to evolve into a recruit, based on a variety of factors. Whether or not to encourage the client to go down this route is at the discretion of the existing Representative, although the standard Genistar process will allow the client to make an assessment of their own as to how viable an option it is for them, based on the information and scenarios presented.

Should the client express interest in joining further to the presentation of the Financial Game Plan, and should the existing Representative consider that there are no obvious barriers to prevent them from joining Genistar, the individual can be invited to complete an Independent Business Application (IBA) with the appropriate fee.

4) Independent Business Application (IBA) and Agreement

When a decision has been made to submit an application, the new recruit must complete an application form (Independent Business Application, IBA) and pay the appropriate fee.

The IBA includes detailed fitness and propriety questions, in addition to standard verification of identity and address, the right to work in the UK, potential conflicts with existing circumstances, and credit history.

5) Verification of Identity and Right to Work in the UK

Once submitted to Genistar, the IBA is reviewed and assessed by the Compliance Department. They will have to go through a Know Your Customer (KYC) background check which the Quality Assurance Department will carry out. This includes a standard SmartSearch (Identity / AML) and Equifax (Credit) check on all new Recruits. Right to Work will also be considered. The high standards of fitness and propriety set by the FCA principles are adhered to throughout this assessment, and any indication that an individual is not an appropriate person to represent Genistar; to visit customers in their homes and discuss complex financial matters with them; to ensure the adequate education and safety and protection of Genistar customers; or the ability to maintain competence in the role overall; will be rejected.

All IBAs are ultimately formally approved by Compliance Department. The Compliance Department Team may instigate an early review and assessment by the Compliance Department Director in circumstances where any element of the suitability of the individual is in question.

6) Assignment to Team

Once verified and approved, a new Recruit is assigned to an appropriate team, typically this will be the same team as the individual that recruited the new Recruit. EVP's, however, have the authority to request a hierarchy change. This could occur in the event that there is restricted or no capacity for supervision in the upline.

7) Roles at Genistar

Once verified and approved, new Recruits are provided with access to the Genistar.Online training platform. Here they will find the examinations and accompanying learning resources.

At Genistar there are two pathways new recruits can take: either the Introducer pathway or the Representative pathway.

Introducers: will refer (introduce) their sales leads to a certified Company Representative who will conduct the appointments. The Introducer will receive split commission on any successful sales they share (pass onto) another Representative to conduct the business. Introducers will also be able to complete competencies for select third party provider referrals to refer business.

If an Introducer decides that they want to progress and become a Representative, they need to complete the additional training and examinations requirements of a Representative.

Representatives: will perform a range of tasks from the list below.

- Providing financial education to their clients
- Conducting the sales process for their clients
- Undertaking recruitment to build a team
- Keeping up to date with Genistar company updates
- Following the Genistar processes for conducting their business
- Completing all required training and examinations (detailed in section 8)

Please note: It is not a requirement to purchase a product from Genistar or to recruit individuals to join Genistar in order to become a Company Representative.

8) Examinations and Training

1) Introducer

An Introducer can refer individuals to join Genistar, complete their own IBA and become a Representative. An Introducer can also complete competencies for select licenses to refer business to our third-party providers.

2) Representative Exam

The Representative exam is part of the process for an individual to become fully licensed to write their own business. Representatives must also complete the practical skills training outlined in section 9).

Part 1 Modules consist of:

1. Regulation and Compliance
2. Complaints and GDPR
3. Anti Money Laundering
4. Anti Bribery and Corruption
5. Equality and Diversity

Part 2 Modules consist of:

1. Financial Protection
2. Compliance with Genistar
3. Training and Competency Scheme
4. The Sales Process

Recruits are required to work through learning materials and supporting training resources to complete and pass the Representative Exam as part of the process to become officially "licenced". The Certification exam has no time limit, although a maximum of three attempts are permitted. If a Recruit fails the exam on three occasions, one to one tuition must be provided for the Recruit by a Skills Coach/EVP. Evidence of this training is to be submitted to the Compliance Department, upon receipt and approval of this, one further attempt at the exam may be granted.

Failure on the 3rd attempt locks the Recruit out of the system (and the process) for a minimum of 3 months, during which time the Recruit must commit themselves to self-study using the materials already provided. They may return after the 3-month period for one more attempt, however, failure on a 4th occasion will result in the Recruit being released from the process and terminated.

For those with additional learning needs, they must make Genistar aware of any support they may require when taking the exam. Genistar already provides training in a range of content, such as in video and audio format, to supplement the reading material and aid the Recruit in developing a well-rounded understanding of the company, products, processes, and how it is regulated. Genistar will aim to seek ways (where possible) to support those who need additional support to take the exam.

9) Practical Skills

Stage 1 - Observing Scoop and Carryback

The Recruit can review video facilitated Scoop and Carryback meetings and training sessions to gain knowledge in the early stages of their Genistar career. After a period of self-led learning and review of material, they will be given the opportunity to accompany an experienced Representative to observe the techniques and regulatory requirements in a live environment (either in person or online).

A minimum of one scoop and one carryback meeting should be observed, although more can be attended should the Representative's appointed Skills Coach feel this is necessary, based on the individual's level of engagement, ability and comprehension. Completion of an appropriate number of observed meetings will be monitored by the Skills Coach.

Stage 2 - Conducting Scoop and Carryback

Following appropriate observation and role play practice, when the Skills Coach deems it appropriate, the new Recruit can begin to arrange their first Scoops. These should be arranged at mutually convenient times, in order that the Skills Coach can accompany the Recruit (either in person or via webinar) and observe the meeting appropriately, offering support and guidance if appropriate. The same applies to subsequent Carryback meetings.

The Recruit must conduct at least one scoop and one carryback meeting whilst being observed by the Skills Coach, with mandatory and desirable skills being noted and recorded on the assessment form. Again, more meetings can be observed should the Skills Coach deem this necessary. The Recruit must successfully achieve all the mandatory skill requirements for both the scoop and carryback meeting, to be deemed competent in the appropriate practical skills for a Representative.

Should the Skills Coach feel that further training is required, the Recruit can go back a step to observing a more experienced Representative in the Scoop and Carryback process and can practice their skills in a role play format.

Please note: A Recruit must not conduct a scoop or carryback meeting with a client on their own until they have been deemed competent and have confirmation on Genistar.Online that they are 'licensed'.

See **Appendix 1** for screenshots of the electronic Scoop and Carryback Assessment Forms.

Permitted Activities and Restrictions During Company Representative Training

Permitted During Training (Unlicensed)	Restrictions During Training (Unlicensed)
Attend training and Business Overviews but not participate in their delivery	Must not participate in any substantive manner in the sales process.
Refer potential recruits to join the Genistar sales force as independent contractors	Must not complete any customer profiles, Fact Finds (Scoops) or Financial Game Plans.
Refer potential Life and Serious Illness customers to a licensed Company Representative (usually their upline) and receive a split commission	Must not give any advice to customers
*Accompany a licensed Company Representative on customer visits but not say anything substantive during the sales process.	
When accompanying a licensed Company Representative at a live sale, the customer must be advised that the unlicensed Company Representative is present for observation and training purposes only	
Receive referral commission for Buildings and Contents cover	

**The Recruit may take notes of what is observed at the meeting but these may only relate to the sales practice and must not contain any personal information about the customer or any other person.*

10) Submitting New Protection Business

Irrespective of experience, all business submissions from the Genistar sales force are first reviewed/ approved by the relevant EVP. Following this they are submitted to the Submissions Team at the Field Support Centre for processing; any overlooked errors are referred back to the EVP, in order to trigger any necessary re-training with Representatives.

Specialist Product Areas

To be deemed competent or to specialise in a specialist product area, such as Income Protection (IP) or Private Medical Insurance (PMI), at least 6 consecutive cases for that specific product must be fully reviewed and passed with no significant errors, to be deemed a competent specialist. All relevant training modules must also be completed.

Core Products

- Term Assurance
- Whole Of Life Cover (excluding Unit or Investment linked policies)
- Serious Illness cover/ Critical Illness cover
- All associated add-ons and optimisers

Specialist Products

- Income Protection
- Private Medical Insurance

For details of the Submissions Team process for new business, see specific operational procedure document.

11) Final Sign-Off - Achieving Licensed and Competent Representative Status

Minimum standards to achieve qualified and competent status;

1	Pass Exams: Representative Certification Exam
2	New Recruit must observe a competent Representative undertaking at least 1 x Scoop as a minimum (or watch video)
3	New Recruit must observe a competent Representative undertaking at least 1 x Carryback as a minimum (or watch video)
4	New Recruit must be observed undertaking 1 Scoop with no fails
5	New Recruit must be observed undertaking 1 Carryback with no fails
6	Achieve three consecutive file check "passes" by the Compliance Department for new business

The Skills Coach is responsible for collating all documentation supporting the Recruit's training and observations, in order to compile an appropriate "body of evidence". This evidence must show that the individual is fully competent to represent Genistar out in the community; to educate others in financial freedom; and arrange protection products without direct supervision. When the above steps are complete, the Recruit will see the relevant system fields turn to Green to signify that their licence has been activated for 12 months.

All documentation must be retained in Genistar.Online for the Representative, this forms the record for the ongoing monitoring of competence and evidence of CPD going forward. This folder will be monitored by the Compliance Department.

12) Internal Responsibilities

Stage	Oversight/Responsibility
Assessment of Independent Business Application (IBA)	Compliance Department
Verification and approval	Compliance Department
Assignment to Team	Compliance Department
Arranging for Representatives to observe scoop/ carry back meetings	Upline / Skills Coach
Ensuring Representatives have access to Training materials/videos; allocation of assignments and Certification test	Automated (system)
Observing recruit on scoop/carry back meetings	Skills Coach / Upline
Reviewing new business cases for errors in submissions	Skills Coach / EVP / Submissions Team
Providing new business submission file review MI to the board	Head of Operations
Reviewing new business cases for appropriateness of solution for identified needs	Compliance Department
Ongoing Supervision	Compliance Department
Oversight of Training and Competence Scheme	Compliance Department

Part 2:
MAINTAINING COMPETENCE

GENISTAR
Financial Freedom For All

1) Introduction

This section sets out the Training and Competence (T&C) procedures for Genistar Limited. Its purpose is to ensure that Genistar's Skills Coaches and Representatives are competent for the work that they do, and that they remain competent year on year.

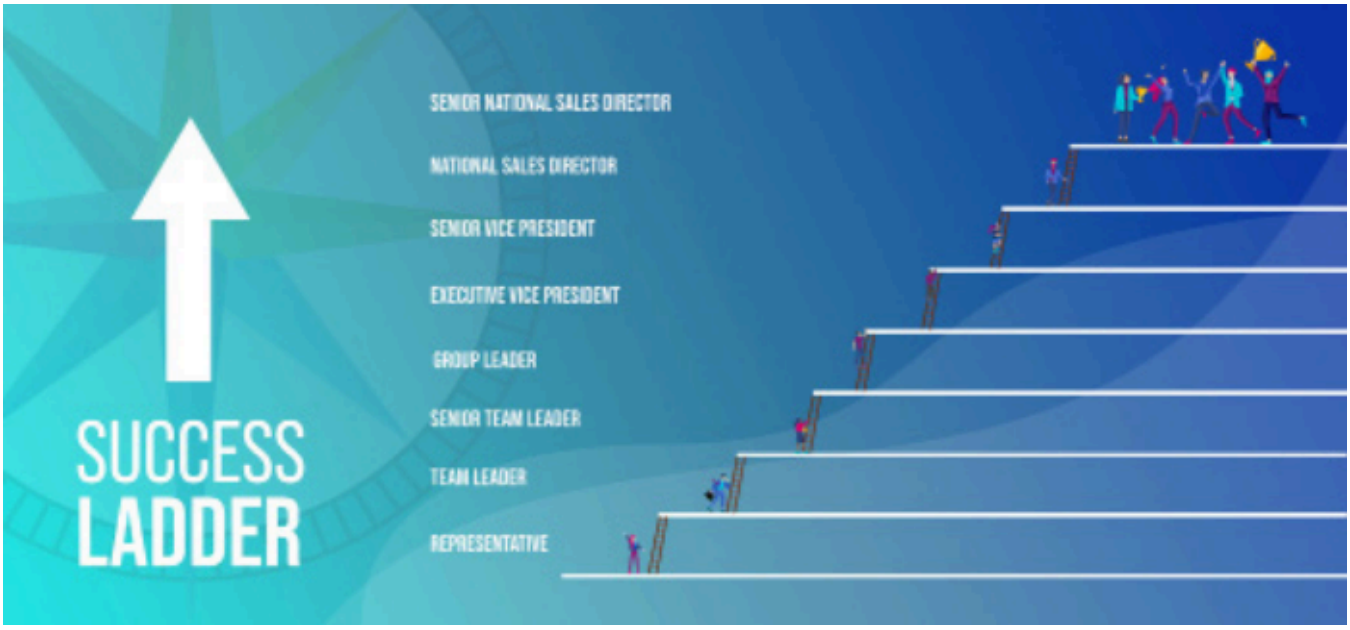
The key components of maintaining competence are set out in the Core stage of the Development Path (see the diagram in Part 1, section 1 of this document).

2) The Importance of Monitoring Ongoing Competence

The FCA Handbook refers to the competence of employees, and the responsibility of ensuring that firms employ personnel with honesty and integrity, and with the skills, knowledge and expertise necessary for the discharge of the responsibilities allocated to them **(SYSC 3.2.14, SYSC 5)**. Whilst Representatives are not directly employed by Genistar but operate under self-employed agreements, Genistar nonetheless adopts an analogous approach for all its Representatives to ensure appropriate behaviour, adequate competency, and the protection of clients.

SYSC 28 of the FCA Handbook also sets out minimum knowledge, ability and good repute requirements for persons (not restricted to employees) carrying out insurance distribution activities. Whilst Genistar Representatives do not give advice, they are arranging (bringing about) non-investment insurance contracts and are therefore subject to these requirements. This scheme is therefore intended to illustrate the systems and controls in place to ensure the suitability and competency of its sales force.

3) Team Hierarchy Structure



4) Monitoring and Supervision Schedule

Representatives: All Representatives, at all levels from recently attaining competence all the way up to Senior Vice President, must be monitored on an on-going basis to ensure that their competence is maintained. The monitoring schedule for each COMPETENT (licenced) Representative is set out as follows;

SNSDs, NSDs and Founding EVPs: Senior members of sales staff, notwithstanding their extensive experience and knowledge of the company, are subject to the same requirements for maintaining their competency as any other Genistar Representative. On that basis, the monitoring schedule above applies to senior individuals as it does for Company Representatives lower in the hierarchies.

There are, however, a limited number of individuals within Genistar with the relevant authority to assess and sign off such staff, as it is not considered appropriate for a skills coach within a downline to be in this position. In the first instance an equivalent member of sales staff at the same level can adopt this task. Should this be inappropriate for any reason, the activity will instead be assigned to an experienced senior member of the Compliance Department, or alternatively another Director on the Board (limited to those with the appropriate background, experience and supervisory skills). Should any occasion arise where this cannot be undertaken, as a final option the firm will assign the task to an external third-party support consultant on an ad-hoc basis.

Skills Coach Task	Frequency
One to One Meeting/Call	Annually (documented using the one-to-one form)
CPD Review	Annually
KPI Reviews	Annually (see section 5 below)
Post Sale File Reviews	10% of new business (performed by compliance provider – Supervisor to review outputs as part of annual 1x1s)
Skills Assessment (1 x Scoop, 1 x Carry Back) – Observation or Role Play	Annually
Certification Exam	Annually
Maintaining Competence	Annually (AML, ABI, FC, GDPR, SM&CR, Complaints)

5) Key Performance Indicators (KPI's)

KPIs will be monitored for all individuals to identify any weaknesses in knowledge, understanding or activity, and to ensure all individuals are achieving minimum standards set by Genistar. The individual (i.e., on a per rep basis) KPI's under review and the benchmarks established are set out below:

KPI	Measure	Benchmark
Optimiser	Policies with optimiser added to policies. Helps to measure product spread and knowledge or product range.	Should be over 65%
Indexation	Policies with indexation added to policies. Helps to measure product spread and knowledge or product range.	Aim for business standard of 55%
Serious Illness Cover	Policies with SIC. Helps to measure product spread and knowledge or product range.	Aim for 35%
Income Protection	Policies with IP. Helps to measure product spread and knowledge or product range.	Aim for 12% Only measured if you hold a valid competency.
Private Medical Insurance	Policies with PMI. Helps to measure product spread and knowledge or product range.	Minimum requirement is 1 per month Only measured if you hold a valid competency.
Submission Only	Policies that were submission only	A maximum of 5%
Replacement Business	Levels of existing business cancelled, surrendered or replaced by new products – can be a high risk and/or costly strategy depending on what is being replaced	No more than 50% of business to be replacing existing products
Persistency & Cancellations	The number of cancellations and/or clawbacks to help identify possible poor technique, lack of clarity or pressure selling.	90% retained business No more than 10% of total transactions cancelled without good reason
File Reviews (post sale)	Allows assessment of the completeness of the documentation and evidence of Know Your Customer processes.	No more than 10% "fail" rate
Complaints	Number and type of complaints received. Analysis to determine underlying reasons for the complaints and trends.	Maximum of one upheld/accepted/ compensated in the last 12 months (PER REPRESENTATIVE)
CPD	Level of ongoing CPD recorded by Representatives	A minimum of 15 hours per annum, relevant and beneficial
Tests	Genistar internal tests	Achievement of pass mark in annual Introducer and Representative Exams in fewer than 3 attempts

Any failure or observation made in the above reviews will be raised by the upline at the one-to-one meeting or call, and any additional training or guidance felt necessary will be provided. The outcome and proposed improvements will be logged on the one-to-one form as a record. Whether or not the individual should continue in a "competent" capacity is at the discretion of the Skills Coach and the appropriate upline.

6) Skills Coaches Appointment and Competence of Skill Coaches

To become a Skills Coach, the following criteria must be met:

1. Nominated by their Executive Vice President (EVP)
2. Must be a Team Leader or above
3. Must have a minimum of 90% Persistency
4. Cannot be on Heightened Supervision
5. Must have completed and passed the Skills Coach Training and Exam

** Must have written at least one piece of regulated business 90 days before conducting an assessment. N.B: If you fall below the standard requirements set out above, your qualification as a Skills Coach will be subject to suspension.*

The Skills Coach Training Consists of 3 modules as follows:

1. Role and Requirements of a Skills Coach
2. How to Assess a Scoop
3. How to Assess a Carryback

The nominated individual must complete each of these video modules and pass the accompanying test with a minimum pass mark of 70% to become a qualified Skills Coach. All new Skills Coaches must attend a Supervisor's Course. Supervisors must also attend refresher training on an annual basis.

The Supervisors course covers the following areas;

- The importance of effective supervision
- Regulatory requirements
- Critical evaluation
- Management, supervisory, and training techniques

The activity of the Skills Coaches across all teams, the records retained of their activities and their ongoing competence in the role, is monitored by the Head of Training and Development with the support of the relevant upline.

7) Quality Assurance

Our Quality Assurance process is designed to ensure close monitoring of written business across the sales force, and sets out not only routine monitoring of all submitted cases, but also specifies fixed, system-based parameters to trigger heightened supervision and increased monitoring in higher risk circumstances. The details and parameters for triggering increased supervision can be found in the central Quality Assurance document, but the structure of what measures will be applied is as follows;

Standard Supervision: 100% pre-submission routine check by upline EVP and FSC; 5-10% post-submission review (by external compliance support)

Heightened Supervision (HS)

- Newly licenced Representatives; 100% pre-submission full file review by FSC (until 5 consecutive satisfactory outcomes are achieved); reducing to 50% (3 satisfactory outcomes); 25% (2 satisfactory outcomes); with an aim to be moved to standard supervision after 12 months
- Existing Representatives and EVP's with 5 or fewer files submitted in the last 12 months = 100% presubmission full file review by FSC (until 5 consecutive satisfactory outcomes are achieved)
- Newly promoted EVP's with 5 or fewer files submitted in the last 12 months; 100% pre-submission full file reviews for them and their downline by Compliance (until 5 consecutive satisfactory outcomes are achieved)
- Early Warning Report trigger - 100% pre-submission full file review by Compliance (until 5 consecutive satisfactory outcomes are achieved)
- External File review results trigger - 100% pre-submission full file review by Compliance (until 5 consecutive satisfactory outcomes are achieved)
- Excessive FSC referrals trigger - 100% pre-submission full file review by internal Compliance (until 5 consecutive satisfactory outcomes are achieved)

8) Loss of Competence and Being 'Unlicensed'

- **An unlicensed Representative:** is defined as having not completed and passed the mandatory annual training within the required timeframe. Representatives will be given a warning to complete this training as a matter of urgency within 30 days, if they fail to do that, their account will be locked out. They must complete the training in order to regain access to submit business.

- **Introducer:** (refer clients for business and potential new Recruits to other Representatives) the activity of an Introducer is not caught by the above definition of an unlicensed Representative, as it is not a regulated function. Introducers are identified within the system by their account status of Introducer, they need to complete and pass the annual introducer mandatory training to maintain their Introducer status to continue to receive and accrue any commissions due (product dependent).

9) Supervisory Activity and Span of Control

The activity of the EVPs with regards to supervision and the records retained of their activities and their ongoing competence in the role, is monitored by the Training Department and Compliance Department.

To ensure that effective oversight can be comfortably maintained, the span of control is limited to a maximum of 55 direct Representatives per EVP. This rational for the limit of 55 is as follows:

A supervisor should be spending about 25% of their time dedicated to supervision duties. On the assumption that there are 220 working days in a calendar year (working 5 days per week, allowing for average holidays and sickness) this would equal 55 days of supervision (25% of 220). With 55 days, this time can be allocated out across the year to 55 direct individuals (1 day per individual). This of course doesn't mean that a supervisor is required to spend a whole day with an individual, it is a guide for how much time throughout the year should be dedicated to each individual depending on their individual needs.

Genistar Representatives whom have been allocated part-time supervisory responsibilities, will also be individuals writing their own business. To allow for this and to ensure supervision does not compromise the individual's own activities, the span of control will be calculated on the basis that a part-time supervisor or skills coach will not spend more than 25% of their time on the supervision of others.

Below outlines the allocation for directs at each level within Genistar to ensure span of control across the different levels within each hierarchy.

Span of Control Directs Allocation Limits

Span of control will be worked out based on a points system for each base shop, using the allocation in the table below. The maximum points in one hierarchy are 268.

Role	Points Allocation	Count Limit	Total Hierarchy Points
EVP (1st generation, recently promoted within 12 months)	2	17	34
GL	4	15	60
STL	6	10	60
TL	8	8	64
Rep	10	10	50
Total		**55**	**268**

** 55 is the limit of the number of individuals that could be direct to an EVP*
*** 268 is the total span of control points limit, along with level limits per role*
**** Working out based on 25% of someone's working time being dedicated to supervision. With 220 working days in a calendar year, this equal 55 days of supervision, one day per individual.*

In the above table, the count limit is the maximum number of directs you can have at each level e.g. 8 team leaders direct to you at any one time. This limit allows you to have a spread of different levels across your hierarchy to be consistently developing EVPs.

The points system is based on experience; the less experienced the rep, the higher the number of points allocated. The system also allows for cross-subsidisation of time resources, so an experienced Representative requiring less time from the supervisor overall, will subsidise the extra time needed for the supervisor to monitor a less experienced individual.

10) Evidence of Continued Professional Development (CPD)

Continued Professional Development CPD is an integral part of a Company Representative's ongoing maintenance of competence. The Insurance Distribution Directive (IDD) was a law passed by the European Union in 2016, with the broad purpose of strengthening the confidence of customers in purchasing insurance products. One of the outcomes of this Directive was the imposition of a new requirement for a minimum level of Continued Professional Development (CPD) to be undertaken by all individuals actively selling or arranging insurance policies (i.e. those involved in insurance distribution).

The requirement is 15 hours per annum, and Representatives are all expected to achieve this with a mix of self-guided reading and study, and provider or Genistar run webinars, events and workshops. Representatives are required to document their CPD records on the in-house system, and an appropriate level of CPD hours will be monitored by Supervisors and the Training team.

Genistar's CPD programme will continue to take into account technical knowledge and its application, the application and development of skills, and changes in the market to products, legislation and regulation. Training will contain learning materials, supporting exams and assessments that automatically log CPD points upon successful completion.

Representatives can also record relevant ad-hoc learning or training hours within your own personal training account within the Genistar dedicated CPD log. This may include attendance at conferences, training seminars, reading and self-reflection statements. To count towards CPD, these will be reviewed and approved.

Failure on the part of a Representative to successfully complete the mandated CPD requirement of 15 hours per annum, will result in the suspension of the Company Representative's activities. Where development needs are identified through adverse Key Performance Indicators (KPIs) and / or submission of inaccurately completed application forms, Supervisors will provide relevant training and action (and inform the Company Department where appropriate) – and maintain full records.

11) MLRO Continuing Profession Development (CPD)

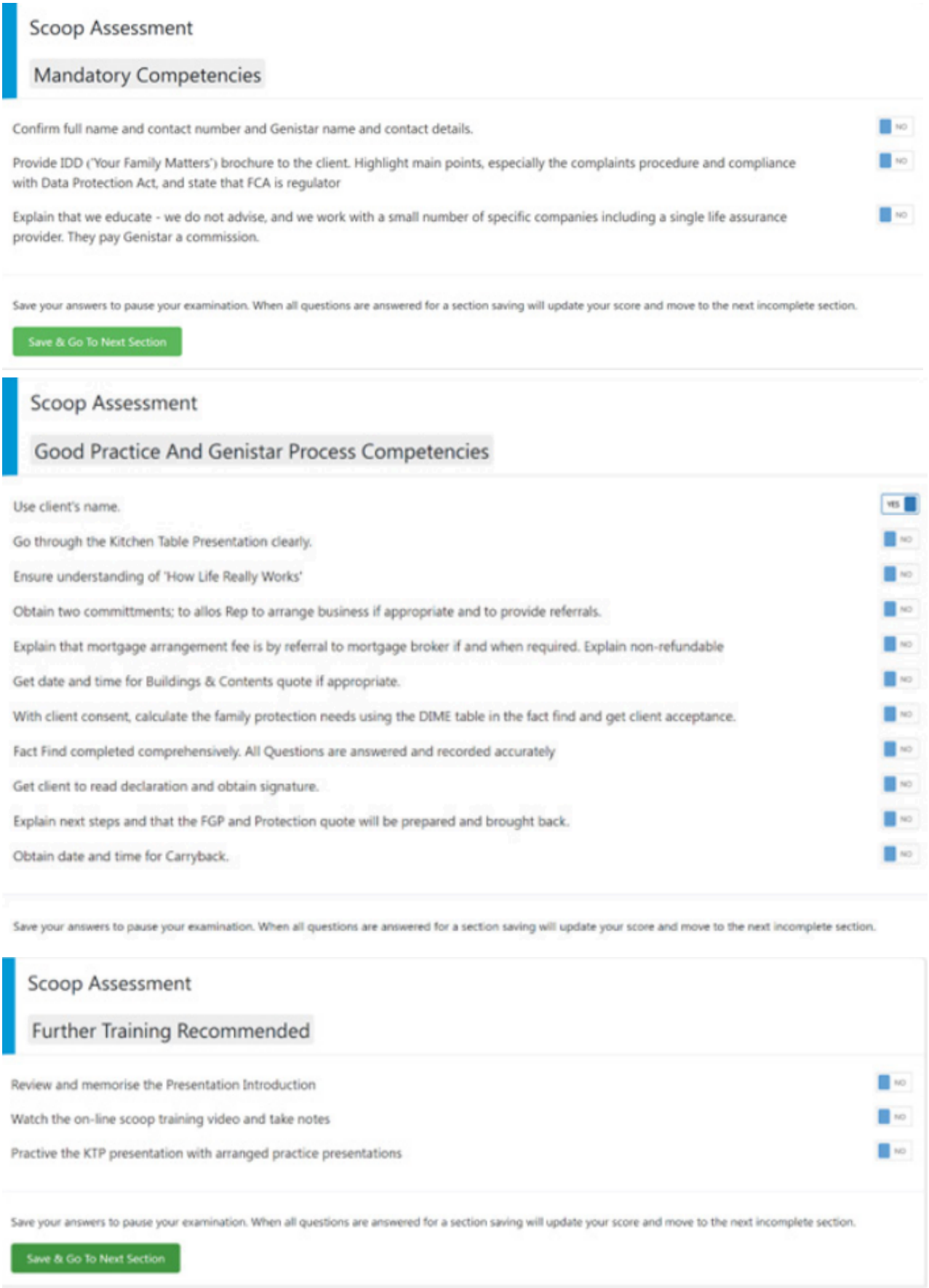
Independently of the above, the senior manager responsible for the regulated Money Laundering Reporting function is required to record an adequate level of CPD in anti-money laundering procedures and financial crime legislation, to demonstrate competence and a suitable level of knowledge to discharge their responsibilities in this area.

Genistar has set the CPD requirement for the current function holder as 10 hours per annum, which can be achieved via self-study of the Joint Money Laundering Steering Group (JLMSG) website and publications, and any other relevant information in the public domain or highlighted by FCA. CPD is to be recorded via the in-house system.

12) Evidence of Continued Professional Development (CPD)

Task	Oversight/Responsibility
Maintaining the Recruitment and T&C Scheme	Compliance Department
Undertaking monitoring tasks for all CRs (1x1s, KPI reviews, skills assessments, CPD reviews)	Skills Coach/EVP/Upline
Monitoring Skills Coach activity and maintaining Span of Control	Compliance Department
Providing Skills Coach training annually	Compliance Department

13) Appendix 1 - Scoop and Carryback Assessment Forms (Screenshots)



Scoop Assessment

Mandatory Competencies

Confirm full name and contact number and Genistar name and contact details. NO

Provide IDD ('Your Family Matters') brochure to the client. Highlight main points, especially the complaints procedure and compliance with Data Protection Act, and state that FCA is regulator NO

Explain that we educate - we do not advise, and we work with a small number of specific companies including a single life assurance provider. They pay Genistar a commission. NO

Save your answers to pause your examination. When all questions are answered for a section saving will update your score and move to the next incomplete section.

Save & Go To Next Section

Scoop Assessment

Good Practice And Genistar Process Competencies

Use client's name. YES

Go through the Kitchen Table Presentation clearly. NO

Ensure understanding of 'How Life Really Works' NO

Obtain two committments; to allos Rep to arrange business if appropriate and to provide referrals. NO

Explain that mortgage arrangement fee is by referral to mortgage broker if and when required. Explain non-refundable NO

Get date and time for Buildings & Contents quote if appropriate. NO

With client consent, calculate the family protection needs using the DIME table in the fact find and get client acceptance. NO

Fact Find completed comprehensively. All Questions are answered and recorded accurately NO

Get client to read declaration and obtain signature. NO

Explain next steps and that the FGP and Protection quote will be prepared and brought back. NO

Obtain date and time for Carryback. NO

Save your answers to pause your examination. When all questions are answered for a section saving will update your score and move to the next incomplete section.

Scoop Assessment

Further Training Recommended

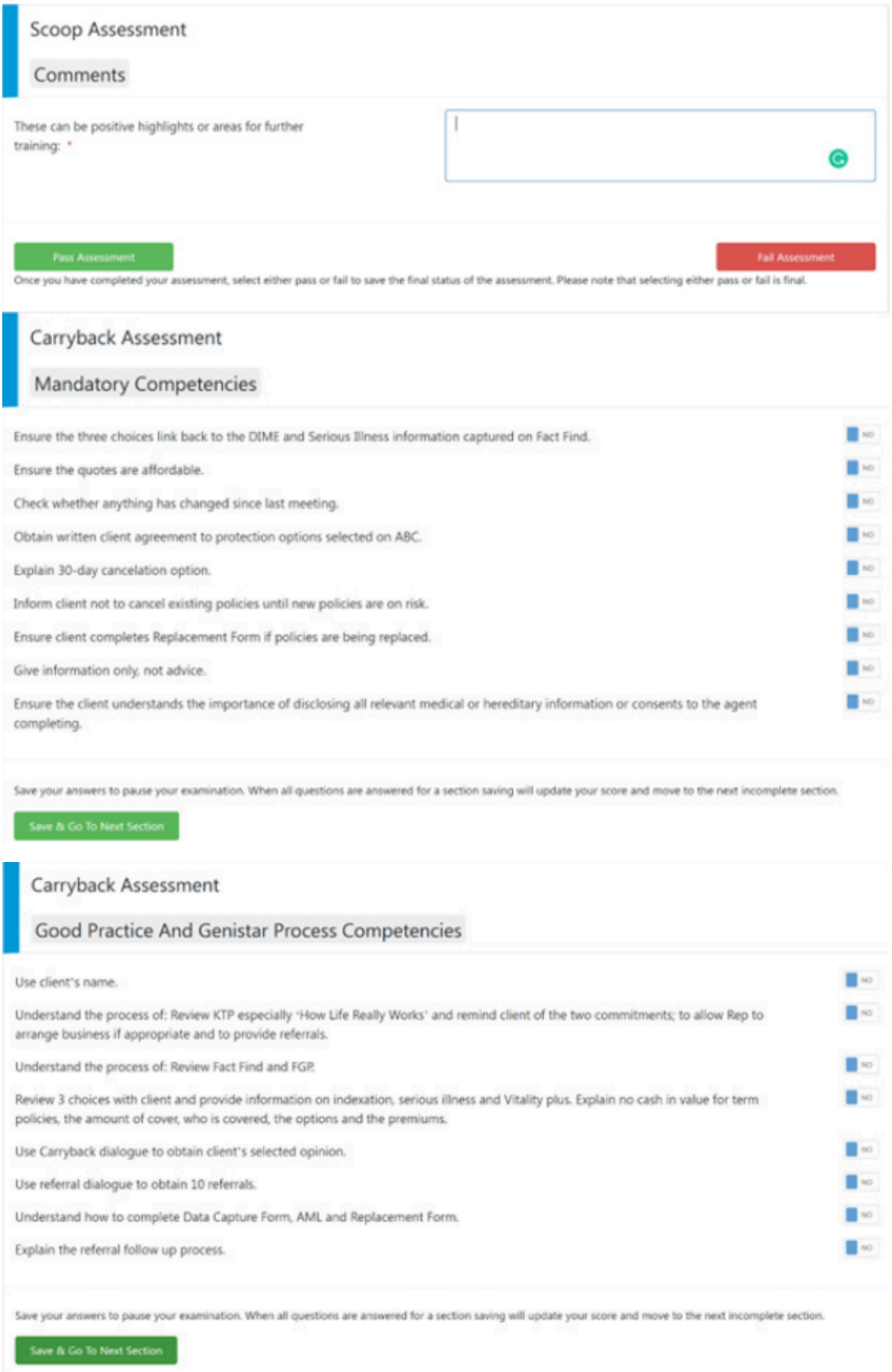
Review and memorise the Presentation Introduction NO

Watch the on-line scoop training video and take notes NO

Practive the KTP presentation with arranged practice presentations NO

Save your answers to pause your examination. When all questions are answered for a section saving will update your score and move to the next incomplete section.

Save & Go To Next Section



Scoop Assessment

Comments

These can be positive highlights or areas for further training: *

Pass Assessment

Fail Assessment

Once you have completed your assessment, select either pass or fail to save the final status of the assessment. Please note that selecting either pass or fail is final.

Carryback Assessment

Mandatory Competencies

Ensure the three choices link back to the DIME and Serious Illness information captured on Fact Find.

Ensure the quotes are affordable.

Check whether anything has changed since last meeting.

Obtain written client agreement to protection options selected on ABC.

Explain 30-day cancelation option.

Inform client not to cancel existing policies until new policies are on risk.

Ensure client completes Replacement Form if policies are being replaced.

Give information only, not advice.

Ensure the client understands the importance of disclosing all relevant medical or hereditary information or consents to the agent completing.

Save your answers to pause your examination. When all questions are answered for a section saving will update your score and move to the next incomplete section.

Save & Go To Next Section

Carryback Assessment

Good Practice And Genistar Process Competencies

Use client's name.

Understand the process of: Review KTP especially 'How Life Really Works' and remind client of the two commitments; to allow Rep to arrange business if appropriate and to provide referrals.

Understand the process of: Review Fact Find and FGP.

Review 3 choices with client and provide information on indexation, serious illness and Vitality plus. Explain no cash in value for term policies, the amount of cover, who is covered, the options and the premiums.

Use Carryback dialogue to obtain client's selected opinion.

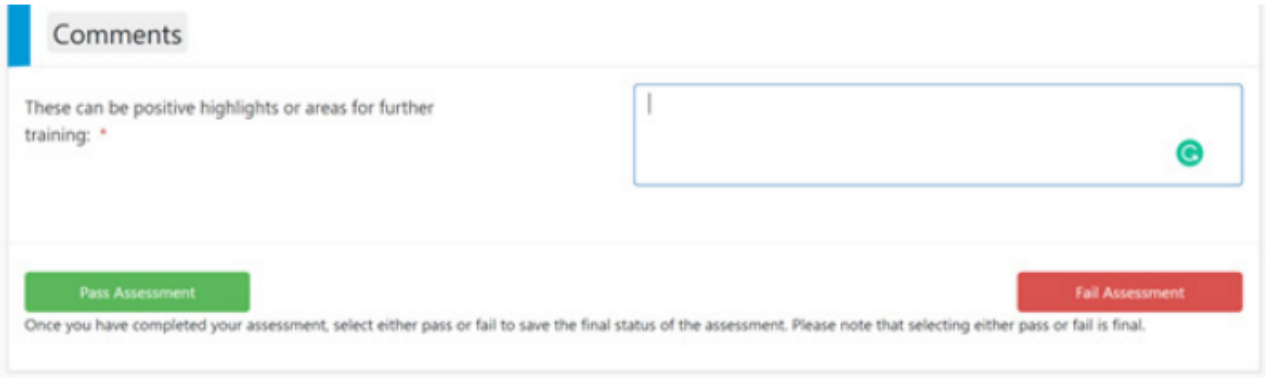
Use referral dialogue to obtain 10 referrals.

Understand how to complete Data Capture Form, AML and Replacement Form.

Explain the referral follow up process.

Save your answers to pause your examination. When all questions are answered for a section saving will update your score and move to the next incomplete section.

Save & Go To Next Section



14) Glossary

EVP	Executive Vice President – typically the top of the upline (although this could also be an SVP or Senior Vice President)
Scoop	Initial client meeting at which the KTP is delivered
Carryback	Subsequent client meeting where the FGP is presented, and the product options set out
KTP	Kitchen Table Presentation - an illustrated brochure-style document which is used to guide the client through key elements of the financial education process
FGP	Financial Game Plan – it is like a financial 'sat nat' to help clients get to their destination. It is mission focused based on their financial goals

15) Version Control

Version	Status	Description of Amendment	Date of Amendment	Amended By
V1-3	In draft	Changes to compliance requirements	22/12/2020	SCB
V4	Final edits		04/05/2021	E Gooday
V5		Introducer revision	28/04/2023	E Gooday
V6	Done	KPI table amended	04/12/2023	E Gooday

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