



Superannuation Complaints Handling Policy

1 March 2024

Member Information

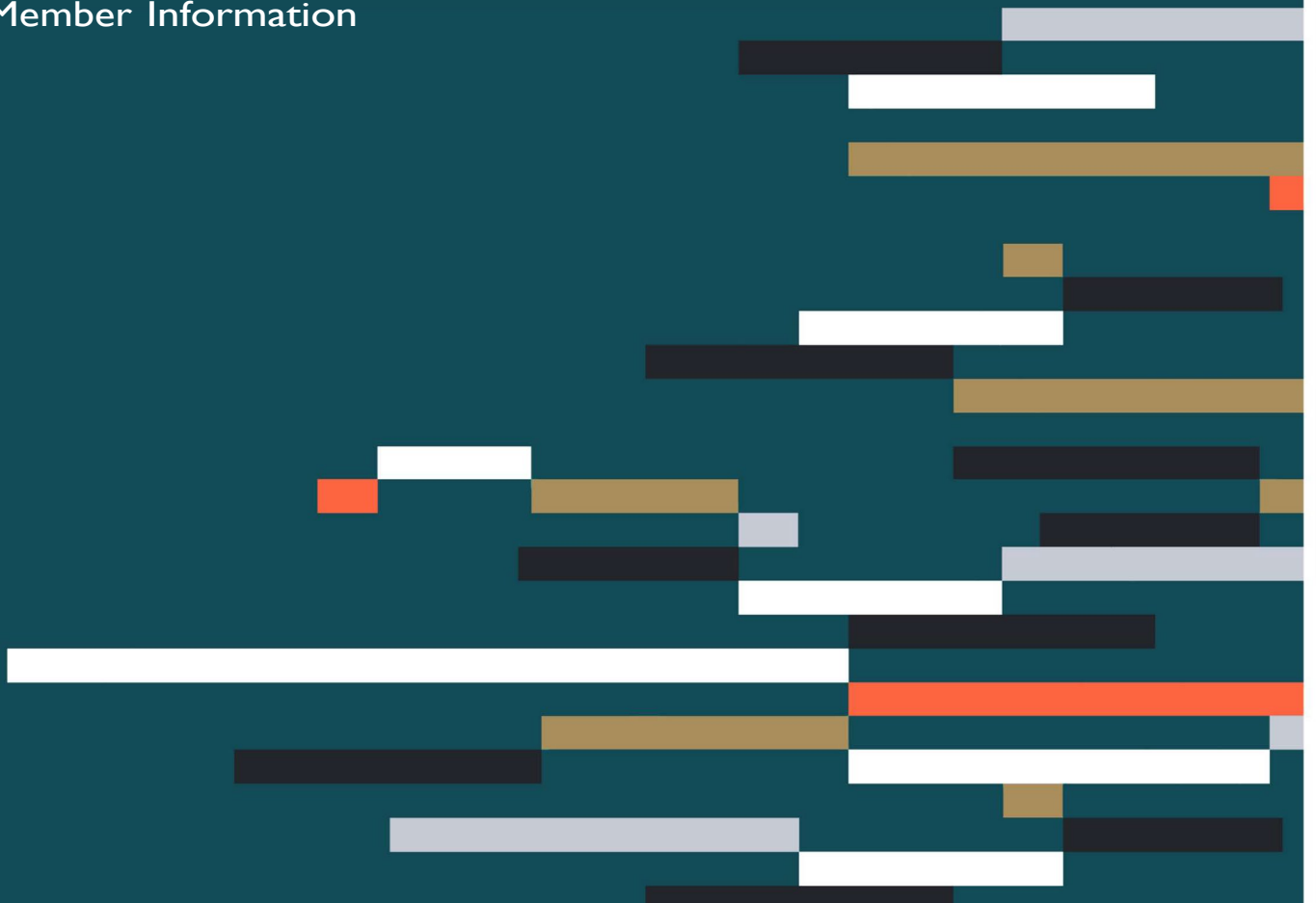


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Purpose

This policy applies to Diversa Trustees Limited (**Diversa**), ABN 49 006 421 638, AFS Licence No. 235153 RSE Licence No. L000635 and CCSL Limited (**CCSL**), ABN 51 104 967 964, AFS Licence No. 287084, RSE Licence No. L000758.

The purpose of this Superannuation Complaints Handling Policy (**Policy**) is to provide you with key information about how Diversa and CCSL will manage complaints from retail clients (you) about the financial products and services we provide.

In this Policy, Diversa and CCSL are also referred to as 'we', 'our' and 'us'. Where we have used a term in this Policy that is defined in the *Corporations Act 2001* (Cth) (**Corporations Act**) or the *Superannuation Industry Supervision Act 1993* (**SIS Act**) that term will take the meaning given to it in that act unless otherwise stated.

This Policy sets out:

- information about who we are and how we work with our service providers to provide our products and services;
- our complaints management framework;
- how you may lodge a complaint with us;
- the options available to you if need additional assistance to lodge a complaint;
- our key steps we follow for dealing with complaints, including acknowledgement, assessment and investigation, and provision of an IDR response;
- our response timeframes; and
- details about accessing the Australian Financial Complaints Authority (**AFCA**) where a complaint is not resolved within the required timeframe, or to your satisfaction.

This Policy is available in hard copy on request – our details to make this request are:

The Complaints Officer
Diversa Trustees Limited
GPO Box 3001
Melbourne VIC 3001
Phone: +61 3 9097 2804
Email: complaints@diversa.com.au

About us

Diversa and CCSL (collectively known as **Diversa**) are Australian Financial Services and Registrable Superannuation Entity Licensees and provide superannuation trustee services to retail clients. We are the trustee for a number of superannuation funds, a full list of these funds is available here: <https://diversa.com.au/funds/>

We provide our products and services to retail clients by engaging with different 3rd party service providers including:

- Superannuation fund administrators;
- Superannuation fund promoters; and
- Life insurers.

Our service providers help us to provide our services to you in a number of different ways, for example they may operate call centres to assist us to respond to your queries, manage websites to provide you with information about our products or provide claims management services to help us pay benefits.

You can find information about each of the superannuation funds Diversa is the trustee for in the relevant Product Disclosure Statements (**PDS**) for each of the products within a superannuation fund. The PDS for your superannuation fund is available on the fund's website.

Our complaints management framework

Diversa is required to have an Internal Dispute Resolution (**IDR**) system in place to manage complaints lodged against the trustee with respect to the superannuation funds and products it issues. This policy along with Diversa's IDR procedures form part of the Diversa Complaints Management Framework. These documents set out how Diversa handles complaints, including the governance arrangements that apply to complaints handling and the procedures which assist us to respond to complaints quickly and effectively.

If you are not satisfied with our response to you, the complaints handling process itself, or you did not receive a response within the required time frame, you may be eligible to take your complaint to an external complaints body.

Diversa is a member of the Australian Financial Complaints Authority (AFCA) which is a free, fair and independent dispute resolution scheme.

How you may lodge a complaint with us

What is a complaint?

A complaint is:

An expression of dissatisfaction made to or about an organization, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. (as set out in AS/NZS 10002:2014.)

What does this mean for you?

If you are unhappy with any of our products or services, and you tell us about it, we will generally treat this as a complaint (eg. where you are eligible to make a complaint and your enquiry meets the definition of a complaint).

If we do not think you are expecting a response from us and we are not otherwise obliged to give you a response, we may treat your enquiry as feedback instead of as a complaint and use it to help us improve our products and services. However, we will only do this if it is reasonably clear that your enquiry does not meet the definition of a 'complaint' (as defined above).

You are generally eligible to make a complaint to us if you are:

- a member or former member of one of our superannuation funds,
- a potential beneficiary of a superannuation death benefit payment,
- a party to an agreement under the Family Law Act 1975 (Cth),
- a party to court orders affecting superannuation,
- authorised to act on behalf of one of the persons described above.

Note: We always treat objections to death benefit distribution decisions and dissatisfaction with insurance claims handling as complaints.

How do I complain?

You can complain to us at any time, and in any way. You can call us, send us a letter or email, post on the fund's social media channel, or use a chat/messaging function (where this is available). How you contact us is up to you.

Your fund will have a number of options for you to provide feedback or make a complaint. You should refer to your fund's dedicated website (where this is available), your PDS or your member statements for information about the most appropriate way to contact us with feedback or a complaint. We recommend you use the contact details specific to your fund for complaints and feedback as this will allow us to deal with your complaint quickly and efficiently.

However, if you want to contact us with feedback or a complaint directly, you can use the details below:

The Complaints Officer
Diversa Trustees Limited
GPO Box 3001
Melbourne VIC 3001
Phone: +61 3 9097 2804
Email: complaints@diversa.com.au

Posting on Social Media

We may treat posts on certain social media platforms as complaints. If you post on a platform that we or our service providers own or control, a representative of the fund may try to contact you to confirm your identity and information, so that we can respond to you. We will always respect your privacy while on social media. We will not ask you to make your personal information public.

What to do if you need assistance to make a complaint?

We know that accessing and understanding financial services can be difficult. If you think you may need assistance to lodge a complaint, please contact us, or arrange for your representative (if applicable) to contact us, and we will make arrangements to assist you with lodging your complaint. This may include access to language services or disability support services.

What happens when you make a complaint?

This section summarises the key steps we follow under our IDR procedure when dealing with complaints, including acknowledgement, investigation, and provision of our formal response to your complaint. We have also included our response timeframes in this section.

The timeframes set out below will commence from the time we, or one of our service providers, receives a complaint that relates wholly or partly to our products or services.

Step One: We will acknowledge your complaint

We will confirm with you that we have received your complaint. Generally, we will acknowledge your complaint in writing, or we may acknowledge your complaint in the same way you contacted us to raise your complaint, unless you tell us otherwise.

We want to ensure that our complaints process is easy to navigate, so you can direct us as to how you want us to contact you about your complaint. Just let us know if you have a communication preference when you lodge your complaint or at any time during the complaints process.

Timeframe

We will acknowledge your complaint within 1 business day of receiving it, or as soon as practicable.

Step Two: We will investigate your complaint

We will make every effort to respond to you as quickly as we can and we will endeavor to resolve your complaint at the time it is raised or shortly thereafter. Where we are unable to do this, we will investigate any issues you have raised in your complaint and provide you with our formal response to your complaint, outlining the outcome of our investigation and its findings. As part of our investigation, we may contact you to request more information about your complaint or supporting materials.

Timeframes

For complaints other than complaints about a death benefit payment decision, the maximum amount of time we can take to respond to your complaint is 45 calendar days.

For complaints about a death benefit distribution decision, the maximum amount of time we can take to respond to your complaint is 90 calendar days after the expiry of the 28 day period for objecting to a proposed death benefit distribution.

More information about how we handle death benefit distribution decision complaints, including the 28 day objection period, is included in the death benefit distribution decision letter that we issue to potential beneficiaries once we have made our initial decision about the distribution of a death benefit.

Step Three: We will respond to your complaint.

When we respond to your complaint, we will generally do so with a formal IDR response in writing. If we provide you with an IDR response, it will include:

- the final outcome of your complaint,
- confirmation of any actions we have taken to resolve your complaint (in part or whole), or
- our reasons for rejecting your complaint (in part or whole),
- any additional information or context necessary for you to understand our decision,
- information about your right to take your complaint to AFCA if you are not satisfied with our IDR response; and
- the contact details for AFCA.

Delays

We will always try to respond within the timeframes set out above. However, if your complaint is complex, or delayed by circumstances beyond our control, we may contact you to notify you that we will not be able to respond within the timeframes set out above.

If we contact you about a delay, we will also provide:

- the reasons for the delay;
- information about your right to complain to the Australian Financial Complaints Authority (AFCA) if you are dissatisfied; and
- the contact details for AFCA.

Other Important Information

What does a complaint cost?

The entire IDR complaints process is free of charge.

Australian Financial Complaints Authority (AFCA)

If you are not satisfied with our formal response to your complaint, or we have not resolved your complaint within 45 days (or for death benefit distribution complaints within 90 days), you can lodge a complaint with AFCA. AFCA provides individuals with fair, free and independent dispute resolution for financial services complaints. AFCA deals with complaints, including those relating to decisions and conduct of Trustees in relation to superannuation funds, in accordance with its Rules and Guidelines.

If we have not had an opportunity to resolve your complaint first, AFCA may ask us to work with you to investigate and respond to your complaint before they commence their process. AFCA's contact details are below:

Website: www.afca.org.au

Telephone: 1800 931 678 (free call)

Email: info@afca.org.au

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

Time limits may apply to complain to AFCA so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

