Super Trustees Australia Ltd

Complaints Management Policy

April 2026

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1 PURPOSE

1.1 The purpose of this Complaints Management Policy (Policy) is to provide a framework for:

(a) the review and consideration of complaints; and

(b) the timely and effective management and resolution of complaints received by STA directly and indirectly via its service providers in relation to STA and any financial services provided by STA under its Australian Financial Services Licence (AFSL).

2 CONTEXT

2.1 With respect to complaints management, STA operates within the Regulatory Requirements established by:

(a) *Superannuation Industry (Supervision) Act 1993*;

(b) *Corporations Act 2001 (Cth);*

and supported by:

(c) ASIC Regulatory Guides; and

(d) Australian Financial Complaints Authority Approach Documents.

3 SCOPE

3.1 This Policy applies to all employees, contractors and service providers of STA.

Relevant internal policies and frameworks

The following policies and frameworks are relevant to this document:

- Member Service and Communications Policy
- Complaints Policy (External)

4 OBJECTIVES AND FRAMEWORK

4.1 STA's framework for complaints management is comprised of:

(a) this Policy;

(b) any procedures issued pursuant to this Policy;

(c) systems to support the implementation of this Policy; and

(d) the Complaints Policy (external).

4.2 This framework has four key objectives:

(a) to improve member outcomes for members and clients;

(b) to seek to resolve complaints received by STA promptly, consistently, fairly and in accordance with regulatory requirements;

(c) to enhance the member, employer, client and other key stakeholder experience when interacting with STA; and

(d) to capture business intelligence to aid in the management of complaints and to identify systemic or emerging issues to better inform product enhancement and service delivery.

5 POLICY PRINCIPLES

5.1 STA is committed to managing complaints in accordance with the guiding principles set out below, with a focus on members and people.

5.2 Members, clients and other key stakeholders have a right to make a complaint when dissatisfied.

5.3 STA:

(a) values complaints;

(b) adopts a member and client focused and and is committed to addressing any issues raised within a reasonable timeframe; and

(c) will take steps to resolve a complaint through the Early Dispute Resolution Process, where practicable and permitted under RG 271.

5.4 Members and key stakeholders will be treated with respect when providing complaints.

5.5 STA will take all reasonable steps to ensure that complainants are not adversely affected when making a complaint.

5.6 Complaints may be made anonymously, although identification is encouraged so that STA can properly respond to issues raised.

Accessibility, visibility and transparency

5.7 Information about complaints handling practices (including a publicly available Complaints Policy) will be easily accessible to the public and made available free-of-charge on the STA website. AFCA's role and contact details will also be published on key documents in accordance with Regulatory Requirements (e.g. Product Disclosure Statements, Financial Services Guide, periodic statements, and complaint response letters).

5.8 Complaints may be made in person, via telephone, or in writing (email, facsimile or correspondence, social media, etc.). STA will monitor social media channels for complaints and respond where the complainant is identifiable and contactable, in accordance with RG 271. Wherever practicable, a voice recording system should be available to record verbal complaints received via telephone.

5.9 Reasonable assistance will be made available to all individuals or entities wishing to make a complaint, including Vulnerable Customers, who will be supported through the process.

5.10 A person may request that another person or organisation assist or represent them when making a complaint, and complaints will be accepted from such authorised representatives. STA will also accept complaints made by a representative acting on behalf of the complainant, without requiring unnecessary authority evidence unless required by law.

Responsiveness and communication

5.11 Complaints will be acknowledged and will be responded to fairly, reasonably and in a timely manner in accordance with the requirements of RG 271.

5.12 As required by RG 271, complainants will be kept informed about the progress of their complaint, and advised of the outcome reached, with reasons provided for a decision, and any review options available, including the availability of the EDR process.

5.13 All complaints will be recorded and tracked, and timeframes for resolution monitored. Where set timeframes cannot be met, the complaint will be escalated to the Head of Compliance Risk, or their delegate, for review and oversight.

5.14 Where practicable, the relevant STA GRC Manager or Officer who receives a complaint should remain the main point of contact with the complainant throughout any Early Dispute Resolution Process involving the complaint.

Objectivity, fairness and equity

5.15 Complaints will be managed objectively, fairly and without bias.

5.16 Complaints will be addressed in an equitable manner and in accordance with this Policy.

5.17 Conflicts of interest, or perceived conflicts of interest, for any STA staff who receive and/or oversee a complaint shall be managed in accordance with the STA Conflict Management Policy.

Conduct of parties and work health and safety

5.18 STA will ensure that its representatives and service providers are appropriately trained so that complaints are handled professionally and in accordance with this Policy.

5.19 Where the complainant's conduct is unreasonable or aggressive, STA will implement strategies to manage the conduct so that the complaint can be resolved, wherever possible, whilst ensuring that the welfare and wellbeing of its staff are protected.

Privacy and disclosure

5.20 Complaints will be handled confidentially, with any Personal Information (defined in accordance with the *Privacy Act 1988*) that is disclosed by the complainant to be managed in accordance with STA's Privacy Policy.

5.21 Complaints about privacy will be managed under this Policy, however the STA Privacy Officer will have oversight and accountability for the resolution of the Complaint.

Accountability and prevention

5.22 STA will have formal, documented procedures and processes for managing complaints which support compliance with this Policy.

5.23 The Head of Compliance Risk will be accountable for implementing the framework and performing the roles and responsibilities set out in this document.

5.24 The framework must ensure that any breach or incident relating to a complaint is identified and recorded. Formal notification of a breach or incident must be reported and managed under the Issue, Incident and Breach Management Policy.

5.25 A complaint may not be formally closed until Remedial Actions have been finalised.

5.26 A complaint may not be formally closed until any Preventative Actions have been finalised, unless the Preventative Action is being formally tracked and monitored in accordance with the Issue, Incident and Breach Management Policy.

5.27 The Head of Compliance Risk may approve the closure of a complaint provided that:

(a) the Complaint is <90 days old; and,

(b) the Complaint has completed both IDR and EDR processes; and,

(c) that Complaint is resolved.

Reporting and continuous improvement

5.28 The resourcing and funding of this framework will be reviewed annually to ensure it remains adequate and reported to the Board. STA will implement processes to identify, assess and escalate systemic issues in accordance with RG 271, including root-cause analysis and tracking corrective actions.

5.29 The framework will be reviewed and updated regularly to ensure its effectiveness, compliance with this Policy and ongoing improvement.

5.30 Complaints must be reported to the Board and management in accordance with this Policy and the framework.

5.31 Data recorded for complaints must be recorded in a Complaints Register and regularly analysed by STA management to:

(a) deliver better member and client outcomes;

(b) drive improvements and efficiencies in products and services offered by STA; and

(c) identify trends or systemic issues.

Empowerment of Staff

5.32 All STA staff, including contractors and service providers, will be trained to receive, acknowledge, and register complaints.

5.33 Information technology systems will be accessible to STA staff to assist with the timely and effective management of complaints, including monitoring, in accordance with this Policy.

5.34 All member / client / employer facing employees of STA will be trained to manage early resolution of complaints that are relevant to their role.

5.35 Nominated STA staff will be trained to manage certain types of complaints throughout the IDR Process, in accordance with their delegated authority and procedures issued pursuant to this Policy.

5.36 STA staff will be encouraged to provide feedback on the framework as a valuable source of insight into STA's operations.

Training and support

5.37 Staff training will be provided to ensure that employees can discharge their responsibilities appropriately in accordance with this Policy and underlying procedures.

5.38 Staff training will be appropriate, tailored and practical, and will be held at least annually.

5.39 The GRC Function will be available to provide advice, support and guidance to employees and service providers involved in complaints management.

Complaints involving multiple parties

5.40 Where a complaint involves an STA service provider e.g. insurer or administrator, STA will ensure that there are appropriate procedures in place to manage the communication and coordination of the complaint. Where practicable, information should be exchanged between the parties to assist with a coordinated investigation of the complaint, provided privacy and confidentiality obligations are maintained.

Outsourcing of the complaints management process

5.41 Parts of the complaints management process may be outsourced to STA's administrators and/or promoters, provided that the management of these complaints is aligned with this Policy.

5.42 STA will take steps to ensure that the management of complaints by its administrators complies with all Regulatory Requirements.

5.43 STA will monitor the ongoing performance of its administrators in relation to the management of complaints.

6 GUIDELINES FOR PROCEDURES

6.1 The procedures supporting implementation of this Policy must include:

(a) an internal dispute resolution procedure that complies with the requirements of this Policy, RG 271 and any other Regulatory Requirements that apply to STA;

(b) a requirement to acknowledge (verbally or in writing) receipt of a complaint within 24 hours (or one business day) of receiving it, or as soon as practicable;

(c) a requirement that a final written response, including the date of the decision, the final outcome of their complaint, details of (any) actions taken and the reasons for the decision including the complainant's right to take their complaint to AFCA and contact details for AFCA, be provided to a complainant:

(i) for all complaints regarding financial hardship, a declined insurance claim, the value of an insurance claim or a formal decision of STA;

(ii) where the complainant has requested a written response; or

(iii) any other complaint received by STA, unless it is resolved under the Early Dispute Resolution process:

- to the complainant's satisfaction; or
- where the complainant has been given an explanation and/or apology and STA can take no further action to reasonably address the complaint;

(d) delegations of authority to resolve certain types of Early Dispute Resolution or IDR Complaints (including the approval of compensation to a complainant) with clear requirements as to how these delegations may be exercised;

(e) a process for managing, tracking, responding to (within regulatory timeframes) and recording complaints, including the following complaint types:

Timeframes for responding, by Complaint Types

Complaint Type	Timeframe*
Privacy Complaints – unauthorised use of personal information or data – to ensure compliance with the Privacy Policy	30 days (response must include Office of the Australian Information Commissioner contact details)
Death benefit distribution complaints or objections	90 days^
Income protection, death and/or TPD insurance claims, disputes and processes (including acceptance or rejection of claims or the benefit amount)	45 days
Any other complaints made about STA (Trustee or Fund)	45 days

**calendar days*

^90 days commences after expiry of the 28 calendar day period allowed for objecting to a distribution under s1056(2) Corporations Act.

(f) a process for issuing an IDR delay notification to the complainant where the timeframes in Table 1 above cannot be met (due to circumstances beyond the control or where the complaint is complex). The notification must advise the complainant of the reason for the delay, specify the expected timeframe for the IDR response and their right to complain to AFCA and AFCA's contact details;

(g) a process for ensuring that incidents and breaches are identified and reported under the Issue, Incident and Breach Management Policy, as part of the receipt and management of complaints;

(h) a process for conducting annual audits to identify non-conformance with this Policy; and

(i) a process for reporting on complaints to the Board and management, including appropriate metrics and analysis, and the identification of systemic issues.

7 EXTERNAL DISPUTE RESOLUTION SCHEME

Australian Financial Complaints Authority

7.1 STA will maintain memberships with AFCA as required.

7.2 STA will ensure that complainants are made aware of AFCA, AFCA's contact details, and the complainant's right to take their complaint to AFCA, in accordance with Regulatory Requirements.

7.3 The Company Secretary will be responsible for overseeing all complaints with AFCA. If a matter proceeds to a hearing, external legal representatives may be utilised to assist in the preparations for the hearing and to identify any potential liability issues.

8 STRATEGIC ALIGNMENT

8.1 This Policy seeks to align with the strategic objectives and values of STA aimed at providing a fair, efficient and transparent process through which our members and clients can air their concerns with STA.

9 ROLES AND RESPONSIBILITIES

9.1 **Employees, contractors and service providers**

- Where possible, resolve the complaint internally.
- Settle simple complaints.
- Register complaint in STA's complaints register.

9.2 **Head of Compliance Risk**

- Fulfil the role of Complaints Officer for the purposes of RG 271 and the key contact point for complaints.
- Oversee all IDR and EDR management processes.
- Review complaints to identify systemic or emerging risks (SIPS).
    - Submission of 6 monthly complaints reporting to ASIC.
    - Manage AFCA complaints with legal risk.
- Settle complaints to a certain value as specified within the Delegations of Authority Policy.

9.3 **GRC Managers and Officers**

- Manage the Complaints Register.
- Day to day liaison with relevant Material Service Providers in respect of internal dispute resolution.
- Day to day handling of complaints with AFCA.

9.4 **Relevant Material Service Providers**

- Review regular complaints reporting in accordance with RG271.
- Authorise staff to implement this policy.
- Ensure adequate resourcing and training of complaints management staff.
- Reporting on complaints to STA.

9.5 **Chief Operating Officer**

- Arranging and oversighting the implementation of this Policy and the framework described within by relevant Material Service Providers.

9.6 **Board Audit Committee**

- Oversight of management of complaints in compliance with STA's regulatory obligations.

- Receive reporting on complaints metrics including trends and systemic issues.
- Brief the Board on the outcomes of its complaints oversight activities and associated recommendations.

9.7 **Board Audit Committee**

- Review and approval of this Policy and any proposed changes.
- Ultimately responsible for oversight of the complaints management framework.

10 POLICY REVIEW

10.1 This policy will be reviewed annually by the GRC Function.

10.2 Triggers for out-of-cycle reviews include changes to relevant legislation or regulation, or significant changes to the operations of STA.

10.3 This policy is subject to STA's assurance process, including internal and external audit.

11 GLOSSARY

Term	Definition
AFCA	The Australian Financial Complaints Authority, an ASIC-approved EDR scheme.
AFSL	Australian Financial Services Licence.
Board	The Board of STA.
Business Days	A day that is not a Saturday, Sunday or a public holiday in Melbourne, Victoria.
STA	Super Trustees Australia Limited as Trustee for various superannuation funds.
Client	A client of STA who has received financial service by STA.
Complainant	The person or organisation making the complaint. A complainant may be any individual or organisation, including but not limited to: (a) a current or former member of a superannuation fund under STA's trusteeship; (b) a current or former client of STA; (c) a person with an interest, or who claims an entitlement to, a death benefit; (d) someone acting on behalf of the persons above or their estate, such as a family member or legal personal representative; or (e) parties (and intending parties) to an agreement under the Family Law Act 1975 or an order affecting superannuation (e.g. a family law split).
Complaint	An expression of dissatisfaction made to or about STA, related to their respective products, services, staff, or the handling of a complaint itself, where a response or resolution is explicitly or implicitly expected or legally required. A complaint includes expressions of dissatisfaction made through any channel, including social media posts where the complainant is identifiable and contactable, even if the complaint is not explicitly directed to STA's designated complaints contact points.
Complaint Register	The register of complaints maintained by STA.
Corporations Law	The *Corporations Act 2001 (Cth)* and the *Corporations Regulation 2001 (Cth)*.
Early Dispute Resolution	The early dispute resolution process, which seeks to resolve a complaint within five (5) business days of receipt. Early Dispute Resolution forms part of the IDR process.
EDR	The external dispute resolution process overseen by AFCA.

Employer	An employer who participates in the Fund, in accordance with the Trust Deed.
Framework	The components of complaints management developed and implemented by STA in accordance with this Policy.
Fund	Any superannuation fund that STA is the Trustee of.
IDR	The internal dispute resolution process used by STA under this Policy to manage complaints in accordance with the Superannuation Law, Corporations Law and industry regulations. IDR incorporates the Early Dispute Resolution process.
Key Stakeholder	A member, former member, client, former client, employer, beneficiary (or potential beneficiary), or another key stakeholder of STA.
Member	A current or former member of any Fund.
Preventative Action	Action taken by STA following review of a complaint to prevent or minimise the chance of recurrence of the event or circumstances which caused the complaint.
Regulatory Requirements	Includes, but is not limited to: • s101 of the *Superannuation Industry (Supervision) Act 1993*; • s1017DA of the *Corporations Act 2001 (Cth)*; • s912A (2) of the *Corporations Act 2001*; • Regulation 7.9.48B *Corporations Regulations 2001*; • ASIC Regulatory Guide 271 Internal Dispute Resolution (RG 271); and • Regulatory Guide 267 Oversight of the Australian Financial Complaints Authority (RG 267) each as amended or supplemented from time to time.
Remedial Action	Action(s) taken by STA to remedy a complaint for the complainant.
Superannuation Law	The *Superannuation Industry (Supervision) Act 1993 (Cth)*, the *Superannuation Industry (Supervision) Regulations 1994 (Cth)* and the *Superannuation (Resolution of Complaints) Act 1993 (Cth)* as amended from time to time.
Trust Deed	The superannuation trust deed of the Fund, as amended from time to time.
Trustee	Super Trustees Australia Ltd.
Vulnerable Members	A person who needs additional assistance in lodging a complaint as a result of one or more of the following circumstances: • age (e.g. members who have met preservation age and are more vulnerable to elderly abuse); • disability; • mental health concerns; • physical health conditions; • family violence; • family breakdown; • language barriers; • literacy barriers; • cultural background barriers; • Aboriginal and Torres Strait Islander peoples with emphasis on those located in remote regional and rural locations, and those with a financial counsellor listed as a third party authority; • geographic location; • financial distress; • higher susceptibility to cybersecurity and /or fraud incidents (e.g. ID theft, lack of technological capability); • isolation; • emergency event or natural disaster; • homelessness; and • incarceration.

12 DOCUMENT CONTROL

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