



# Superannuation Complaints Handling Policy

March 2025

Member Information

## 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.

## What is a complaint?

A complaint is:

*An expression of dissatisfaction made to or about an organisation, 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](mailto:complaints@diversa.com.au)

## 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?

### **Step One: Acknowledging 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.

### **Step Two: Investigate and respond to 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.

It should be noted that there are certain situations where a written response will always be provided, such as when your complaint relates to:

- A financial hardship claim
- The decline of an insurance claim
- The value of an insurance benefit
- Any decision of the Trustee (or failure by the Trustee to make a decision) relating to a complaint

### Timeframes

Reason for complaint	Timeframe to respond
Financial services / advice	Within 30 calendar days after receiving your complaint
Superannuation complaints (except for death benefits)	Within 45 calendar days after receiving your complaint
Privacy complaints	Within 30 calendar days after receiving your complaint
Distribution of superannuation death benefit	Within 90 calendar days after expiry of the initial 28-calendar-day period for objecting to a proposed death benefit distribution

### 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.

Website: [www.afca.org.au](http://www.afca.org.au)

Telephone: 1800 931 678 (free call)

Email: [info@afca.org.au](mailto:info@afca.org.au)

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

### Privacy Complaints

Complaints in relation to unauthorised use of personal information or data will be treated as a Privacy complaint.

Privacy matters are regulated by the Privacy Act 1988 and are enforced by the Office of the Australian Information Commissioner (OAIC). The OAIC can be contacted via their website at <https://www.oaic.gov.au/> or by phone on 1300 363 992.

## We take your privacy seriously

We only gather the relevant personal information we need to investigate and address a complaint.

When you make a complaint to us, we will ensure that your privacy is protected and details about your complaint will only be shared with the people who need to receive this information to assist in its resolution.

You can read our Privacy Policy online at [www.diversa.com.au](http://www.diversa.com.au) or call us on 03 9097 2800.