

# Insignia Financial Limited (IFL) Group Complaints Policy

Public Policy

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## 1. Overview

### 1.1. Introduction

The Insignia Financial Limited (IFL) Group Complaints Policy (**Policy**) has been developed to ensure that complaints are addressed in a consistent, fair and reasonable manner.

### 1.2. Policy statement

Handling and resolving Client complaints adds value to the way we operate, as it allows us to:

- improve business systems and processes, products and services, all of which are integral to delivering what matters to our clients;
- identify a potential breakdown in process, an issue, an incident, or a potential breach of legislation; and
- reduce the risk of systemic issues.

This Policy sets out how clients can register a complaint and how we deal with complaints received from clients, and stakeholders and who are eligible to complain as outlined in Australian Securities and Investments Commission's (ASIC) Regulatory Guide 271 (RG 271).

### 1.3. Scope and application

This Policy applies to IFL and its subsidiaries and related bodies corporate, which comprise Registrable Superannuation Entity Licensees (RSEs), Responsible Entities (REs), Australian Financial Services Licensees (AFSLs) and Australian Credit Licensees (ACLs) (collectively referred to as 'IFL' or 'Insignia' in this Policy). Where an entity specifically adopts this Policy (for example an ASIC or APRA-regulated entity) references to IFL or Insignia are taken to be a reference to that entity.

All IFL employees, including casual, temporary, and contracted employees as well as executives and non-executive directors, any independent board committee members that are not directors and any third parties acting on behalf of the group (collectively referred to as 'our people' in this Policy) must comply with this Policy.

## 2. Guidelines

### 2.1. What is a complaint?

In accordance with RG 271 and Australian Standard, AS 10002:2022 Guidelines for complaint management in organizations, a complaint is defined as:

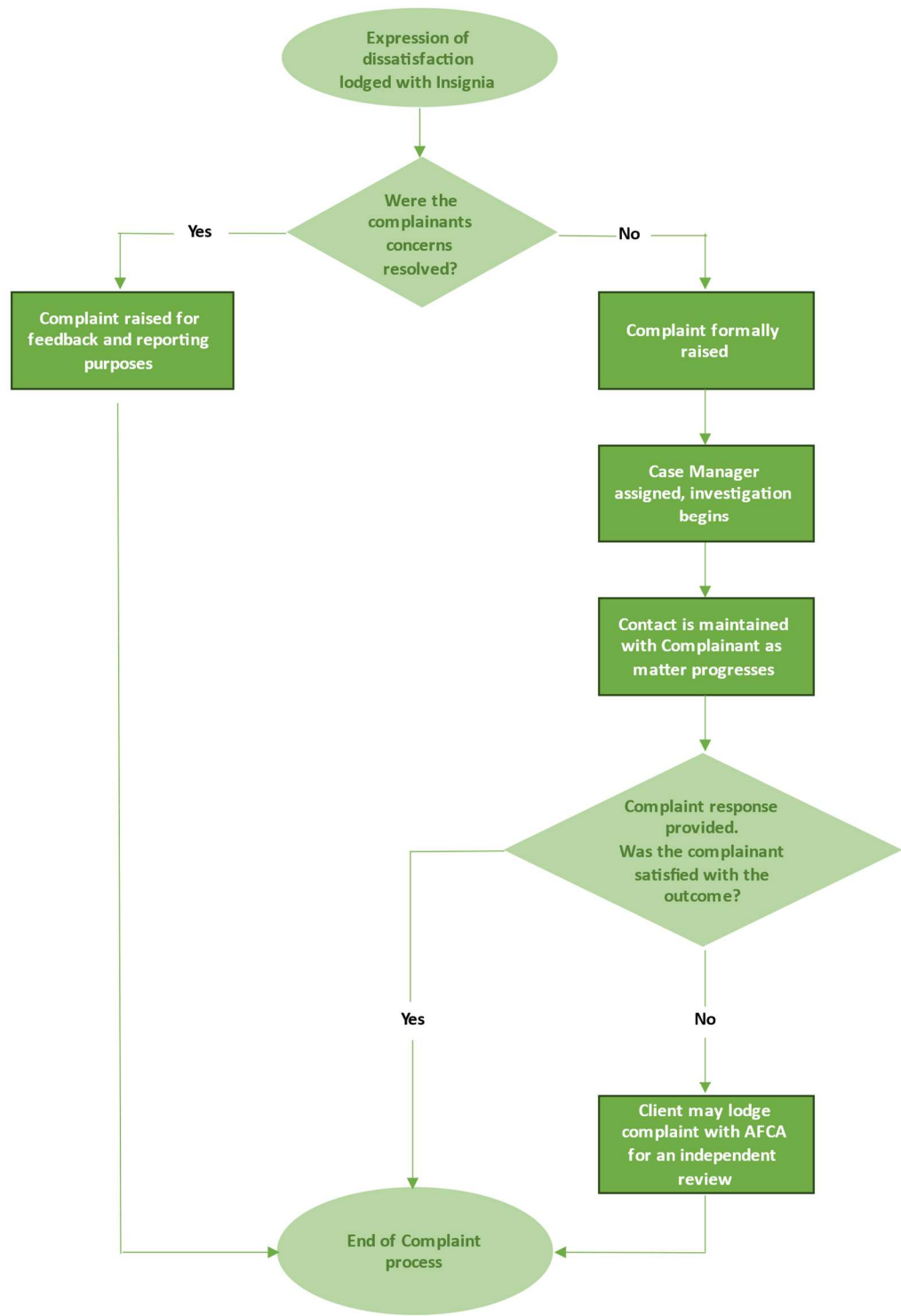
An expression of dissatisfaction made to, or about, Insignia;

- related to Insignia's products, services, staff or the handling of a complaint; and
- where a response or resolution is explicitly or implicitly expected or legally required.

This includes expressions of dissatisfaction made on social media in accordance with RG 271.

Note, the National Credit Code refers to 'disputes' and not 'complaints'. For the purpose of this Policy disputes has the same meaning as complaints.

2.2. The complaint process



## 2.3. Complaint handling principles

To achieve a positive client experience, IFL ensures the business model for complaint resolution is optimised to uphold the following principles:

- We are visible and accessible to you and complaints can be lodged easily via multiple channels.
- We will provide a complaint resolution process which is free of charge.
- We aim to resolve complaints immediately at the initial contact when you express your dissatisfaction.
- All complaints are recorded, including where they are resolved at the initial contact with us.
- We listen to you and take steps to resolve your complaint within prescribed timeframes.
- We seek to resolve your complaint to your satisfaction where possible. If we cannot agree on a solution, we will clearly explain our position or reasons for our decision and provide escalation avenues.
- Responsibility for complaints is given to our people not involved in the subject matter to maintain independence and fairness of the complaint investigation and resolution.
- Our communication style is simple and easy to understand;
- We can utilise multiple channels to communicate with clients and will use a clients preferred channel where possible.
- Complaints trends are reported transparently and regularly to members of the Executive Team, Insignia Boards and relevant Committees to ensure organisation-wide visibility.
- Complaints lodged with an External Dispute Resolution (EDR) body (such as the Australian Financial Complaints Authority) are managed separately to the Internal Dispute Resolution (IDR) process, which allows for independent review of the IDR outcome.

## 2.4. Who can make a complaint?

Complaints can be received from clients, their authorised representatives, and various other stakeholders.

We will not exclude complaints received from third parties raised on behalf of a client and we will accept complaints from complainants as defined in RG 271 (as a minimum).

These may include (and are not limited to):

- |   |   |
|---|---|
| ▪ an existing client and a former client                              | ▪ an executor of an estate  |
| ▪ a client's nominated financial adviser or authorised representative | ▪ a legal representative  |
| ▪ a trust beneficiary   | ▪ an authorised third party with a valid third-party authority or a power of attorney |
| ▪ a superannuation member's employer                                  | ▪ a superannuation fund beneficiary   |
|   | ▪ a trustee of a self-managed superannuation fund                                     |

If you would like further details about who can make a complaint, please contact us.

## 2.5. Making a complaint

Complaints can be made online, including social media platform, by phone, email or in writing.

Product	Phone - weekdays 8.30am to 6.30pm (AEST)	Email	Website	Writing
ANZ Smart Choice Super (retail and employer) and Pension	13 12 87 (or +61 2 8366 1500 from overseas)	superfeedback@insigniafinancial.com.au	<a href="https://www.anz.com.au/personal/superannuation/smart-choice-super/">https://www.anz.com.au/personal/superannuation/smart-choice-super/</a>	Complaints Team GPO Box 5107 Sydney NSW 2001
OnePath Superannuation and Investments e.g.; OneAnswer Frontier Super, Pension and Investments & Integra Super	133 665 (or +61 2 8366 1510 from overseas)	superfeedback@insigniafinancial.com.au	<a href="https://onepathsuperinvest.com.au/about-us/feedback">https://onepathsuperinvest.com.au/about-us/feedback</a>	Complaints Team GPO Box 5306 Sydney NSW 2001
Voyage Wrap  Grow Wrap	1800 892 353  1800 095 825	voyage@wrapinvest.com.au  Complaints from Advisers: adviser@wrapinvest.com.au  Complaints from Customers: customer@wrapinvest.com.au	wrapinvest.com.au	Voyage Wrap GPO Box 3154 Sydney NSW 2001  Grow Wrap GPO Box 3154 Sydney NSW 2001
IOOF e.g; IOOF Employer Super, IOOF Pension, IOOF Personal Super, IOOF Essential Super, eXpand Super, IOOF Essential pension, eXpand Pension	1800 913 118 (or +6 1 3 8614 4967 from overseas)	customercare@insigniafinancial.com.au	<a href="https://www.ioof.com.au/contact-us">https://www.ioof.com.au/contact-us</a>	Insignia Financial Client First GPO Box 264 Melbourne VIC 3001
Advice Complaints (Refer to section 9 for list of Licensees)	1800 271 147	advicecomplaints@insigniafinancial.com.au	<a href="https://www.ioof.com.au/contact-us">https://www.ioof.com.au/contact-us</a>	Insignia Advice Complaints GPO Box 264 Melbourne VIC 3001

## Insignia Financial | Insignia Financial Limited (IFL) Group Complaints Policy

Privacy Complaints	1800 913 118	Privacy.Officer@insigniafinancial.com.au	<a href="https://www.ioof.com.au/contact-us">https://www.ioof.com.au/contact-us</a>	Privacy Officer GPO Box 264 Melbourne VIC 3001
MLC MasterKey MasterKey Super Pension Fundamentals; MasterKey Business and Personal Super; MasterKey Term Allocated Pension; MasterKey Investment Service Fundamentals; MasterKey Investment Service	132 652 (Outside Australia +61 3 9966 5802)	complaints@mlc.com.au	mlc.com.au/complaint	GPO Box 4341, Melbourne, Vic, 3001
MLC Navigator/Wrap Superannuation and Investment e.g. MLC Navigator/Wrap Superannuation Plan; MLC Navigator/Wrap Retirement Plan; MLC Navigator/Wrap Investment Plan; MLC Separately Managed Account	1800 517 124	complaints@mlc.com.au	mlc.com.au/complaint	GPO Box 4341, Melbourne, Vic, 3001
Plum Plum Corporate Super (including DB and Account Based Pensions); Plum Personal Plan (retained); Plum Retirement Income; Plum Insurance Only	1300 55 7586 (Outside Australia +61 3 9966 5813)	complaints@mlc.com.au	plum.com.au/complaints	GPO Box 63, Melbourne, Vic, 3001
Blueprint Superannuation and Investment Plan DPM Superannuation and Investment Plan	1800 517 124	complaints@mlc.com.au		GPO Box 4341, Melbourne, Vic, 3001

## Insignia Financial | Insignia Financial Limited (IFL) Group Complaints Policy

Enevia Superannuation and Investment Plan FC One Superannuation and Investment Plan PremiumChoice Superannuation and Investment Plan Portfoliofocus Superannuation and Investment Plan St Andrew's Superannuation and Investment Plan				
Altrinsic Antares Equities Antares Fixed Income Intermede Fairview MLC Index Plus MLC Real Return MLC Wholesale Horizon MLC Global Private Equity	Weekdays 8.30am to 5.30pm (AEST) 1300 738 355	client.services@mlcam.com.au	mlcam.com.au/terms-and-conditions	Client Services PO Box 200 North Sydney NSW 2059 Australia
IOOF Finance Choice	1800 271 147	customer@insigniafinancial.com.au	https://www.ioof.com.au/contact-us	GPO Box 264 Melbourne Vic 3001
Insignia Shareholders	Phone: 1300 552 203 (Australia only)	Insignia@boardroomlimited.com.au	http://www.boardroomlimited.com.au	Boardroom Pty Limited Level 7, 333 Collins Street Melbourne VIC 3000

Please note, insurance claim related complaints in respect of each product above should also be directed to the above contact points.

Complaints made on a social media channel or account owned or controlled by the financial firm that is the subject of the post, where the author is both identifiable and contactable will follow the Complaints process. When lodging a complaint, providing the following information will assist us in responding and investigating your complaint in a timely manner:

- Your name (you may remain anonymous or use a pseudonym, please see section 2.7).
- Your preferred contact details and method of contact (phone, email etc); and



- Details of the complaint or issue including:
  - the service or product;
  - your account number or client reference, if applicable;
  - the nature of your concern;
  - any information you believe would assist us to understand and investigate your complaint further; and
  - details of the outcome you are looking to achieve or how best we can address your feedback.

To protect your privacy, when making a complaint via social media please ensure your personal information is provided in a secure manner such as a private message and not via a public post.

## **2.6 Assistance with registering a complaint**

We are happy to help you register your complaint – please contact us if you need assistance.

We are committed to ensuring our complaints process is accessible to all clients and will work with you to discuss your complaint via your preferred method of communication where possible.

We work with a number of support services to enable clients with disabilities or vulnerabilities to raise their concerns.

- **If you do not speak English** and you wish to make a complaint:
  - We can arrange an interpreter to assist you in lodging and managing your complaint, subject to availability.
  - If an interpreter is not available, you can phone the Translating and Interpreting Service on 13 14 50 for help with your call.
- **If you are deaf**, or have a **hearing or speech impairment**, please phone us through the National Relay Service (NRS) on the numbers listed below:
  - TTY users, phone 13 36 77 and ask for the phone number you need (if you are calling from overseas phone +61 7 3815 7799); and
  - Speak and Listen (speech-to-speech relay) users, phone 1300 555 727 and ask for the phone number you need (if you are calling from overseas phone +61 7 3815 8000).
- **Internet relay users**, connect to the NRS on [www.relayservice.com.au](http://www.relayservice.com.au) and ask for the phone number you need.

If you would like further information about the National Relay Service, phone 1800 555 660 or email [helpdesk@relayservice.com.au](mailto:helpdesk@relayservice.com.au)

## **2.7. Complaint made anonymously**

If you make a complaint anonymously or use a pseudonym and do not provide us with enough information to identify and/or contact you, we may not be able to apply all of our complaints handling processes to your complaint.

**2.8. How we handle complaints**

We value all complaints and aim to respond to you promptly. We recognise some complaints are particularly urgent. We assess and prioritise complaints according to the urgency and severity of the issues raised. When dealing with complaints, our people must ensure the principle of fairness underpins the investigation and outcome of your complaint.

Fairness ensures you have the right to:

- be heard;
- know whether we have complied with legal and regulatory requirements;
- provide and request all relevant material to support your complaint;
- be informed about this Policy and the criteria that will be taken into consideration by us in dealing with the complaint;
- be informed about other avenues for further review including referral to the relevant EDR schemes (refer to section 8) of which we are a member;
- be provided with a response to your complaint including our decision and reasons for that decision;
- know that your complaint is being reviewed independently within Insignia (where this is possible); and
- confidentiality, if requested or considered appropriate.

**2.9. Acknowledging a complaint**

We will acknowledge your complaint within 24 hours (or one business day) of receiving it, or as soon as practicable. We will acknowledge your complaint verbally or in writing (email, post or social media channels). When determining the appropriate method of communication, we will consider the method that you used to lodge your complaint and any preferences that you may have expressed about communication methods.

**2.10. Considering your complaint**

With any complaint, we will consider what is fair and reasonable in the circumstances, as well as our obligations under the law and industry codes of practice. Where possible, we will aim to resolve your complaint at the time you raise it with us.

If you refer your complaint to us, we will work with you to resolve your complaint within the timeframe prescribed under ASIC RG 271 as detailed below:

Type of complaint	Maximum response timeframe
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<b>Superannuation complaints except for death benefit distribution objections</b>	45 calendar days
<b>Non-Superannuation complaints e.g., Investment Products</b>	30 calendar days
<b>Privacy complaints</b>	30 calendar days
<b>Superannuation death benefit distribution objections</b>	No later than 90 calendar days after the expiry of the 28-calendar day period for objecting to a proposed death benefit distribution referred to in s1056(2)(a) of the Corporations Act.
<b>Advice and stockbroking complaints</b>	30 calendar days

If we are unable to resolve your complaint within the maximum timeframe, we will write to you, before that time has expired. In the notification, we will explain the status of the complaint, the reasons for the delay, your right to lodge your complaint with an EDR scheme and the name and contact details of the relevant EDR scheme.

## 2.11. Responding to your complaint

We will work with you to explore options for resolving your complaint. If we cannot resolve your complaint with you, we will provide the reasons for the decision we make, including providing supporting information where applicable.

We will provide a response to you in writing if we take more than 5 business days to resolve your complaint.

We will also provide a written response, even where the complaint is closed by the end of the fifth business day, if:

- you request a written response; or
- your complaint is about:
  - hardship;
  - a declined insurance claim;
  - the value of an insurance claim; or
  - a decision of a superannuation trustee or failure by the trustee to make a decision relating to the complaint.

## 2.12. Your options for review

If your complaint relates to a financial service or product, you may be able to request a free and impartial review by the Australian Financial Complaints Authority (AFCA).

AFCA offers a fair, independent, and accessible dispute resolution for consumers who are unable to resolve complaints directly with their financial services provider.

You may have the option to lodge a complaint with AFCA directly rather than lodging a complaint with us, you are also able to lodge a complaint with AFCA if you are not satisfied with our response or if your complaint has not been resolved within the maximum timeframe prescribed by RG271 (refer to section 7.2).

**Please note**

Time limits may apply to complaints 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.

You can contact AFCA at:

Website: <a href="http://afca.org.au">afca.org.au</a>	Postal Address:
Email: <a href="mailto:info@afca.org.au">info@afca.org.au</a>	Australian Financial Complaints Authority
Phone: 1800 931 678 (free call)	GPO Box 3
	Melbourne, VIC, 3001

If your complaint relates to a privacy matter and you are not satisfied with our response or if your complaint has not been resolved within 30 days, you can contact the Office of the Australian Information Commissioner (OAIC) at:

Website: <a href="http://oaic.gov.au">oaic.gov.au</a>	Postal address:
Email: <a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>	Office of the Australian Information Commissioner
Phone: 1300 363 992	GPO Box 5218
	Sydney NSW 2001

**3. Document information**

**3.1 File Details**

<b>Title</b>	Insignia Group Complaints Policy	
<b>Owner</b>	General Manager of Customer Resolutions	
<b>Approved by</b>	<b>Board</b>	<b>Approved</b>
	Actuate Alliance Services Pty Ltd	17/05/2024

	Antares Capital Partners Ltd	22/05/2024
	Bridges Financial Services Pty Ltd	20/05/2024
	Consultum Financial Advisers Pty Ltd	20/05/2024
	Financial Services Partners Pty Ltd	20/05/2024
	IOOF Investment Management Ltd	24/05/2024
	IOOF Investment Services Ltd	20/05/2024
	Lonsdale Financial Group Ltd	21/05/2024
	Managed Portfolio Services Ltd	24/05/2024
	MLC Asset Management Pty Ltd	18/05/2024
	MLC Asset Management Services Ltd	18/05/2024
	MLC Investments Ltd	24/05/2024
	Navigator Australia Ltd	22/05/2024
	NULIS Nominees (Australia) Ltd	22/05/2024
	Oasis Asset Management Ltd	27/05/2024
	Oasis Fund Management Ltd	28/05/2024
	OnePath Custodians Pty Ltd	24/05/2024
	OnePath Funds Management Ltd	21/05/2024
	RI Advice group Pty Ltd	22/05/2024
	Shadforth Financial Group Ltd	19/05/2024
<b>Hierarchy level</b>	Level 1 – Board Approved Policy	
<b>Effective date</b>	28 May 2024	
<b>Last reviewed</b>	H1 2024	
<b>Next review</b>	H1 2025	
<b>Atlas ID</b>	1007780	

## 5.2 Revision History

Version	Date released	Author(s)	Description
4.0	February 2025	Rachelle Taylor	Removal of IOOF Finance Choice

			Minor updates, including contact detail updates for: <ul style="list-style-type: none"> <li>• postal addresses</li> <li>• email addresses</li> <li>• phone numbers</li> </ul>
<b>3.0</b>	August 2024	Darren Callaghan	Minor updates, including; <ul style="list-style-type: none"> <li>○ Updates to language</li> <li>○ Updates to format and positioning of content</li> <li>○ Addition of Appendix 1: Roles and responsibilities</li> </ul> Addition of Appendix 1: Roles and responsibilities Addition of Appendix 2: Key concepts and definitions
<b>2.0</b>	March 2022	Stephen Southworth	Minor updates
<b>1.0</b>	February 2021	Lauren Ratini	Development of Group Complaints Policy

## Appendix 1: Roles and responsibilities

Roles & responsibilities	
Roles	Responsibility
<b>Board</b>	The Boards of Insignia Financial Ltd, each Registrable Superannuation Entity, and AFSL are ultimately responsible for the Groups Complaints Framework. Day to day operational responsibility for Complaint handling is delegated to the Executive Team to ensure activities, appropriate resourcing, planning, and testing is undertaken which are appropriate to the size, complexity, and business functions of the entity.
<b>Business Units</b>	<ul style="list-style-type: none"> <li>• BUs, as the 1st line of defence, are responsible for:</li> <li>• implementing and embedding Business Unit deliverables in line with risk appetite and Policy;</li> <li>• ensuring all employees with a designated role in the process be made aware of, and trained for their role, responsibilities, and accountabilities with respect to this policy, providing general education and training for our people;</li> <li>• rectifying issues, incidents and action plans arising from testing and internal audit reviews; and</li> <li>• liaising with other BUs to ensure successful operationalisation of this policy.</li> </ul>
<b>Internal audit</b>	The program will be reviewed periodically by internal audit, or an external independent expert, and the results reported to the relevant Committee(s). The purpose of the periodic review is to provide assurance that the [insert] is in accordance with the Policy, it addresses the risks it is designed to control and that testing procedures are adequate and have been conducted satisfactorily.
<b>Risk Management</b>	<p>The function, as the 2nd line of defence, is responsible for:</p> <ul style="list-style-type: none"> <li>• overseeing and challenging Complaint Handling activities and provision of appropriate policy, tools, guidance, insight, and reporting.</li> <li>• providing subject matter expertise to guide and assist BUs in all steps throughout [insert] development and maintenance;</li> </ul>

## Appendix 2: Key concepts and definitions

Key concepts and definitions	
Terms	Definitions
<b>ACL</b>	Australian Credit Licence
<b>AFSL</b>	<p>AFS Licence refers to an Australian Financial Services licence issued by ASIC, which authorises licensees to:</p> <ul style="list-style-type: none"> <li>• provide financial product advice to clients;</li> <li>• deal in a financial product;</li> <li>• make a market for a financial product;</li> <li>• operate a registered scheme;</li> <li>• provide a custodial or depository service; or</li> <li>• provide traditional trustee company services.</li> </ul>
<b>APRA</b>	Australian Prudential Regulation Authority
<b>ASIC</b>	Australian Securities and Investments Commission
<b>Board</b>	Reference to IFL and its subsidiary boards including its licensed entity boards (combined or individually)
<b>Board Committee</b>	Reference to a committee of the IFL Board which includes the Group Risk and Compliance Committee, Group Audit Committee, Group People and Remuneration Committee and Group Nominations Committee.
<b>Business</b>	The business of the Insignia Financial group
<b>Business Unit</b>	Part of the Group that represents a specific business function, Complaint handling.
<b>Clients</b>	<p>Insignia Financial' s Clients comprise the following:</p> <ul style="list-style-type: none"> <li>• Members of any superannuation fund for which any entity within IFL is the RSE Licensee;</li> <li>• Investors in any investment scheme operated by any entity within the Group in its capacity as the RE;</li> <li>• Investors in investor directed portfolio services issued by entities within the Group in its capacity as the RE;</li> <li>• Employer sponsors of superannuation funds for which an entity within the Group is the RSE Licensee; and</li> <li>• Financial advisers, comprising IFL employees and authorised representatives within the Advice Business and independent financial advisers, who provide advice in relation to the Group's products and services and thus serve Members and Investors.</li> </ul>



Corporations Act	Corporations Act 2001 (Cth)
<b>Complaint</b>	<p>In accordance with RG 271 and Australian Standard, AS 10002:2022 Guidelines for complaint management in organisations Australian/New Zealand Standard ISO 10002-2014, a complaint is defined as:</p> <p>An expression of dissatisfaction, made to, or about, IFL;</p> <ul style="list-style-type: none"> <li>related to IFLs products, services, staff or the handling of a complaint; and</li> <li>where a response or resolution is explicitly or implicitly expected or legally required.</li> </ul>
<b>IFL</b>	Insignia Financial Ltd (ABN 49 100 103 722) and or “Insignia Financial”
<b>IFL Board</b>	The Board of IFL
<b>GRCC</b>	Group Risk and Compliance Committee
<b>Group ‘we’/‘us’</b>	IFL and its subsidiaries and related bodies corporate
<b>IFL Subsidiaries</b>	subsidiaries of IFL
<b>Insignia Financial or the group</b>	IFL, the IFL subsidiaries and related bodies corporate
<b>Management</b>	The management of Insignia Financial
<b>Manager</b>	Team Leaders, Managers and/or Heads of, that represent a specific business function responsible for Complaint handling
<b>Operations</b>	Our people who service and administer Client enquiries via various mediums e.g. phone, email and mail.
<b>Owner</b>	The Owner is responsible for the Document at all stages of the framework lifecycle
<b>Our People</b>	Our people has the meaning given to it in paragraph 1.2 of this framework
<b>RCC</b>	Risk and Compliance Committee
<b>RE</b>	A responsible entity, being the company named in ASIC’s record of the scheme’s registration as the responsible entity of the investment scheme in accordance with s601EB of the Corporations Act
<b>RM</b>	Risk Management
<b>RSE</b>	A registrable superannuation entity, which is a regulated superannuation fund or an approved deposit fund or a pooled superannuation trust but does not

	include a self-managed superannuation fund. Registration of RSEs is affected under Part 2B of the Superannuation Industry (Supervision) Act 1993
<b>RSEL</b>	An RSE licensee is a body corporate that holds an RSE licence granted by APRA