

1. Purpose of this document

The trustee of the Russell Investments Master Trust (Fund) is called Total Risk Management Pty Ltd (TRM). Resource Super and Nationwide Super are divisions of the Fund.

This *Fund Complaints Policy* summarises the detailed information about the Fund in the TRM Enquiries & Complaints Policy. The purpose of this document is to provide members of the Fund with comprehensive information about how the trustee deals with complaints.

2. Timeframe to handle complaints

The trustee is required to answer member complaints in accordance with the following time frames.

TYPE OF COMPLAINT	TIME FRAME TO BE RESOLVED
Superannuation complaints*	45 days
Death benefit distribution complaints*	90 days
Privacy complaints	30 days

If the complaint cannot be resolved in the time frames shown, a “Delay Notification” letter is issued to members to advise them of:

- the reasons for the delay
- the fact that the member has a right to complain to the Australian Financial Complaints Authority (AFCA), which is the national external dispute resolution body
- the contact details for AFCA.

3. Other places to get information about complaints

- The **Product Disclosure Statement**, which details how a member may make an enquiry or a complaint and provides the requisite details of AFCA.
- The **Dispute Resolution Fact Sheet** which can be found at russellinvestments.com.au/factsheets
- The **TRM Complaints Charter** which is available at russellinvestments.com/au/resources/trm-complaints-charter

4. What is an enquiry and what is a complaint?

An **enquiry** means a request for information.

A **complaint** means:

- a verbal or written expression of dissatisfaction related to the Fund products or services, staff or complaints handling

process, where a response or resolution is explicitly or implicitly expected or legally required

- an objection about a death benefit distribution decision.

Objection/complaints about death benefit distribution decisions

When the trustee makes a decision about a death benefit distribution, information is provided to beneficiaries and they are provided with the opportunity to lodge an objection within 28 days of them being given the decision.

The beneficiary may make an objection with the Fund or AFCA.

Where the objection has been made to AFCA directly, AFCA will refer the complaint to the Fund in the first instance.

Where an objection is received within the 28-day period, this is to be treated as a complaint, and is subject to a 90-day time frame for resolution. However, the 90 days commence from the end of the 28-day notice period.

The trustee will gather any required information and will consider the complaint. The trustee can maintain its decision, or it can amend its decision or make a new decision.

TRUSTEE MAINTAINS DECISION	TRUSTEE AMENDS OR MAKES A NEW DECISION
The decision is advised to the complainant(s) with advice they have 28 days in which to lodge a complaint with AFCA.	The amended/new decision is advised to all beneficiaries.
The decision is advised to all other beneficiaries. <i>However, please note only the complainant(s) have a right to lodge a complaint with AFCA.</i>	They are provided with 28 days in which to object to the decision (to the Fund or AFCA). Any objection received is to be treated as a new complaint.

AFCA can only consider death benefit distribution complaints from:

- persons who have an interest in the death benefit and
- persons who have lodged an objection to the Fund or AFCA before the end of the 28-day claim-staking period.

5. Who can make a complaint?

- a current member
- or former member
- a person with an interest in a death benefit
- parties (or intending parties) to an agreement or order under the Family Law Act in relation to a member’s superannuation interest.

It is also possible to receive a complaint from the persons above or from their representative, an employer-sponsor of the Fund, an insurer of the Fund or a Distributor of the Fund.

Complaints made via social media

The Fund has the following social media channels:

- Apple Store and Goggle Play Store: Review of the Super App
- Twitter: @RussellInvestAU @Nationwidesuper
- LinkedIn: Russell Investments Australia & NZ, Nationwide Super, Resource Super
- Google Reviews: Russell Investments, Nationwide Super
- Facebook: Nationwide Super, Resource Super
- YouTube: Russell Investments, Nationwide Super, Resource Super
- Instagram: Resource Super

Where a **complaint** has been made and a specific Fund member can be identified, the complaint will be handled as per the complaints policy. If a specific Fund member cannot be identified, or it is an anonymous complaint, the issue will be resolved where possible, but the complaint will not be logged as a formal complaint.

6. Complaints handling process

When a complaint is received:

Step 1: Acknowledgement

The complaint is to be acknowledged by the Fund within one business day or as soon as practicable. The acknowledgement can be in writing (letter or email) or via telephone.

Step 2: Urgent/priority complaints

Generally, complaints will be addressed in the same order as they are received. However, this will not always be appropriate, and additional urgency for certain complaints may be required. For example, if the member is suffering financial hardship or there are mental health concerns or if a member may suffer a financial loss, the resolution of that complaint can be prioritised above other member complaints.

Step 3: Complaint investigation

Each complaint received is investigated to obtain all information and documents necessary for the trustee to properly consider the complaint.

Complex complaints

We recognise complex complaints may take longer than 45 days to resolve, complex complaints include complaints:

- regarding a transaction more than 6 years ago, or
- requiring an account reconstruction, or
- any other complex matter.

Complex complaints are referred to subject matter experts as soon as possible. However, in the event the complaint will take longer than 45 days to be resolved, members will be sent a "Delay Notification" letter which advises:

- the reasons for the delay
- the member has a right to complain to the AFCA.
- the contact details for AFCA.

Step 4: Decisions

Overriding principles to complaint resolution

The complaints-handling process is to be easily accessible to all complainants and all Fund complaints are to be:

- handled in a timely, equitable, objective and unbiased manner, with a view to promoting confidence in the complaints-handling process
- investigated appropriately and a written response, including the reasons for its decision, provided as quickly as possible.

Decision letter

When the trustee has considered the complaint, a decision letter is to be issued to the member and the letter should:

- identify and address the issues raised in the complaint
- set out the Fund's findings/conclusions on each of the issues
- provide the outcome to the complaint
- provide enough detail for the member to understand the basis of the decision and to be fully informed when deciding whether to take the complaint to AFCA or another forum
- advise the member of their right to take the complaint to AFCA if they are not satisfied with the response
- provide the contact details for AFCA.

Complaints resolved within five days of receipt

Where the complaint is resolved within five days of receipt, a written response is not required unless:

- a. the member requests a written response; or
- b. the complaint is about:
 - i. hardship;
 - ii. a declined insurance claim;
 - iii. the value of an insurance claim; or
 - iv. a decision of the trustee*.

7. How to lodge a complaint

Please also refer to the TRM Complaints Charter or the PDS for further information.

Making a complaint is simple and easy. A complaint can be made by telephone, post or email.

Our contact details

By phone

1800 555 667

By email

RIMTcomplaints@russellinvestments.com.au

By mail

Complaints Officer
Locked Bag A4094
SYDNEY SOUTH NSW 1235

What can members complain about?

Members can complain about any service they have received, or a feature of their superannuation account, or a process or procedure used (or not used) by the superannuation fund, including the complaints handling process.

What information should be included

- The complainant's name and contact details, including, if possible, an email address and a business hours telephone number.
- Details of the complaint, including any urgent circumstances, to allow us to understand, consider and assess the complaint.
- Details of any prior contact with us on the issue or complaint and any relevant correspondence with us which may assist us in considering your complaint.

8. Contact details for AFCA

AFCA is an independent body set up by the Federal Government to assist members or beneficiaries to resolve certain financial complaints.

Once AFCA accepts your complaint, it will attempt to resolve the matter through conciliation, which involves assisting the parties to come to a mutual agreement. If conciliation is unsuccessful, the complaint is formally referred to AFCA for a determination.

You should first ring to find out whether AFCA can handle your complaint and the type of information you need to provide. Further information can also be obtained from the AFCA website.

You can contact AFCA:

By mail

Australian Financial Complaints Authority
GPO Box 3
MELBOURNE VIC 3001

By phone

1800 931 678

By email

info@afca.org.au

Online

afca.org.au

If you are looking to lodge a complaint with AFCA via their website, please select "Russell Investments Master Trust, current trustee Total Risk Management Pty Ltd" from the list of names on AFCA's online complaints form.

* Where it is unclear whether a trustee decision has been made, we use the examples as per ASIC's Data Dictionary under "Financial Entity Decision" and this would cover complaints about:

- Insurance coverage terms
- Cancellation of policy
- Claim amounts
- Denied claims
- Early release claims
- Death benefit distribution
- Family law division of super benefit
- Interpretation of product terms and conditions
- Unfair contract terms
- Unconscionable conduct
- Denial of application or variation request
- Margin call notice and/or investment liquidation
- Valuation
- Financial firm decision – commercial practice or policy
- Other decision-related issues.