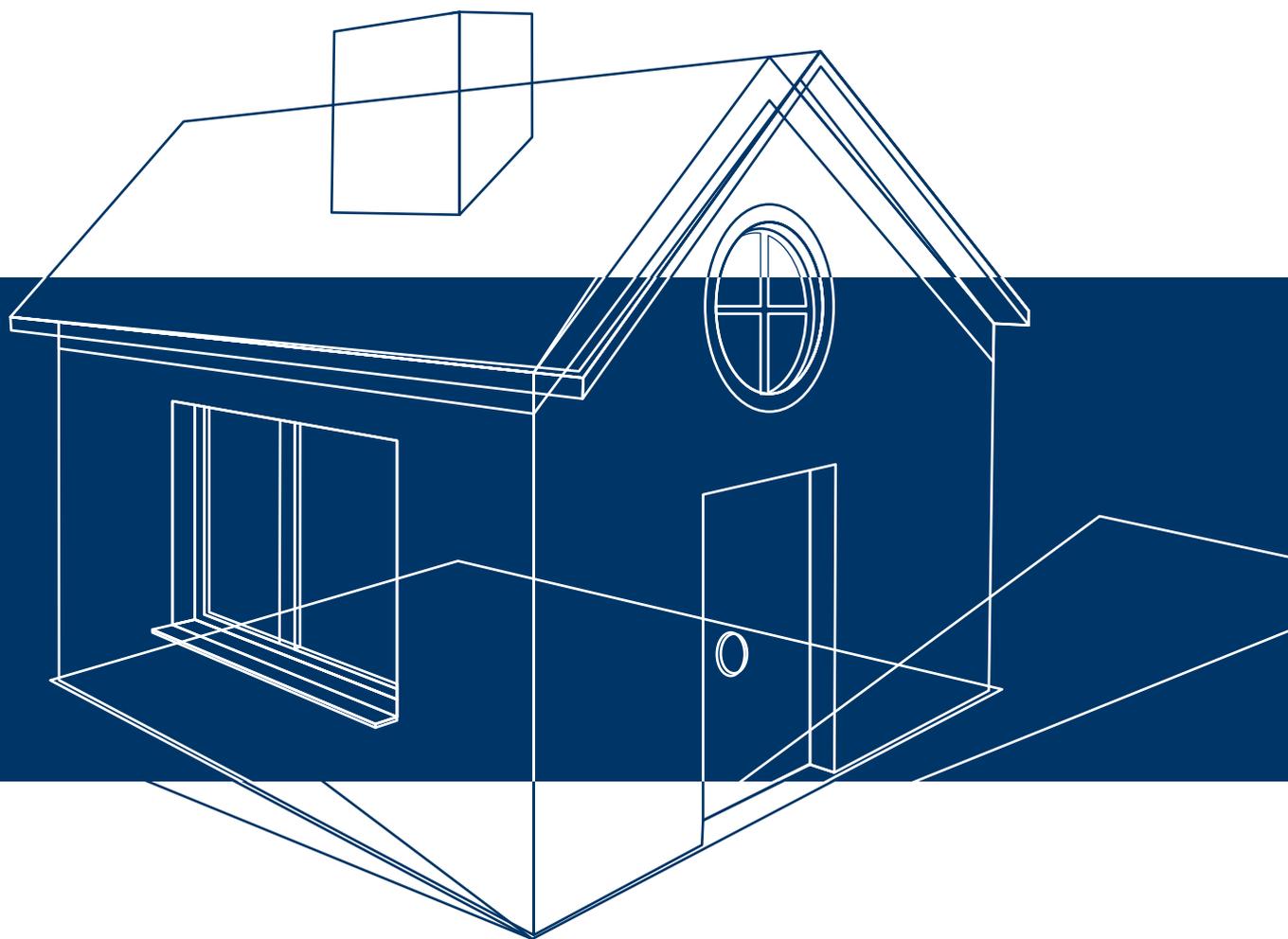


GOVERNANCE TOOLKIT

Insurance Management Framework

Version 1:1 March 2014



THIS TOOLKIT PROUDLY SUPPORTED BY

MO MILLS OAKLEY
LAWYERS



Purpose of the Governance Toolkits

AIST has developed the Governance Toolkits to assist **Trustees** with maintaining strong prudential frameworks. They are created specifically to assist AIST members and are a benefit of membership.

The Toolkits contain functional tools such as diagrams, decision trees, flowcharts and checklists, to assist **Trustees** with understanding and applying their legal obligations, regulatory guidance and AIST governance guidelines.

How to use this Toolkit

The Insurance Management Framework Toolkit is designed to assist **Trustees** with understanding and implementing the Superannuation Prudential Standard SPS 250 Insurance in Superannuation (**SPS 250**).

Tools

Obligations Map	showing the source of the Insurance in Superannuation requirements and how they interconnect with the broader regulatory framework
Implementation Flowchart	to implement Insurance obligations
Checklists	<ul style="list-style-type: none"> - to develop an Insurance Management Framework - to develop an Insurance Strategy - to document Insurance Arrangements - to select Insurers and to monitor and renew Insurance Arrangements
Dictionary	words in bold font are defined in a Dictionary at the back of the Toolkit. AIST recommends that members of the Board and other relevant staff familiarise themselves with the key concepts in the Dictionary.
Alerts	<p>Symbol  is used to identify an issue that needs particular care. It may denote:</p> <ul style="list-style-type: none"> - an issue or uncertainty arising from different, overlapping requirements; or - a matter that requires particular care in interpretation or application to a Trustee's particular circumstances.

Warning & Disclaimer

The Toolkit is intended to assist **Trustees** but does not replace or exhaustively replicate primary sources of a **Trustee's** legal obligations, such as general law, legislation, regulations, prudential standards and regulatory guidance.

While the  identifies issues requiring particular care, content without a  should not be regarded as any less significant. The **Trustee** will have to make its own judgements on how to apply the information in this Toolkit and should seek professional advice if uncertain.

This Toolkit does not constitute legal advice and should not be relied upon to demonstrate compliance with any legal obligation or standard of conduct expected of **Trustees** or their directors. While this Toolkit is a valuable tool for a **Trustee** considering its obligations, it will not guarantee compliance or sound prudential outcomes.

Content in this Toolkit is adapted from the Australian Prudential Regulation Authority (APRA) publications Superannuation Prudential Standard **SPS 250** – Insurance in Superannuation (November 2012), and Prudential Practice Guide **SPG 250** – Insurance in Superannuation (**SPG 250**) (July 2013).

The information is current as at 1 March 2014. The Prudential Standards and Prudential Practice Guides can change and any changes made on or after 1 March 2014 will need to be taken into account.

Further assistance

If you would like further assistance, contact your professional advisers or alternative contact AIST at info@aist.asn.au or Mills Oakley Lawyers at super@millsoakley.com.au.

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1. RSE licensee’s obligations

1.1 Insurance Management Framework

The **RSE licensee** must have in place an **Insurance Management Framework** to manage making insured benefits available to beneficiaries. It must:

- (a) be appropriate to the size, business mix and complexity of its business operations;
- (b) be appropriate to the types of insured benefits it will make available; and
- (c) include its **Insurance Strategy** and the systems, structures, policies, processes and people required to manage the provision of insured benefits to members and beneficiaries and includes the specific components outlined in SPS 250.

The Board is ultimately responsible for the **Insurance Management Framework** and must ensure it is independently reviewed at least every 3 years.

1.2 Insurance Strategy

The **RSE licensee’s Insurance Strategy** must comply with the **Insurance Covenants** in section 52(7) of the **SIS Act** and must contain the detail required by SPS 250.

1.3 Insurance Arrangements

The **RSE licensee** must decide on the appropriate **Insurance Arrangements** to offer to its members and beneficiaries (including the MySuper member specific benefit requirements) and document these in the level of detail required by SPS 250.

1.4 Due Diligence Process

The **RSE licensee** must apply an appropriate due diligence process for the selection and monitoring of insurers and for the renewal of insurance policies.

1.5 Source of obligations

The **Insurance Covenants** impose the obligation and set out some of the content required in an **Insurance Strategy**. SPS 250 sets out additional minimal requirements for the **Insurance Strategy** and creates the obligation to have an **Insurance Management Framework**. SPG 250 provides additional guidance for the implementation of SPS 250 and sets out APRA’s expectations. Other obligations arise from the **SIS Act** and **SIS Regs** including:

- (a) the operating standard in respect of permitted types of insurance under regulation 4.07D of the **SIS Regs**;
- (b) the requirements under section 68AA to provide permanent incapacity and death benefits for MySuper members, which are affected by the ‘opt-out’ provisions in regulation 9.49 of the **SIS Regs**; and
- (c) the operating standard for self-insurance under regulation 4.07E of the **SIS Regs** including transitional provisions in respect of self-insurance until 1 July 2016.

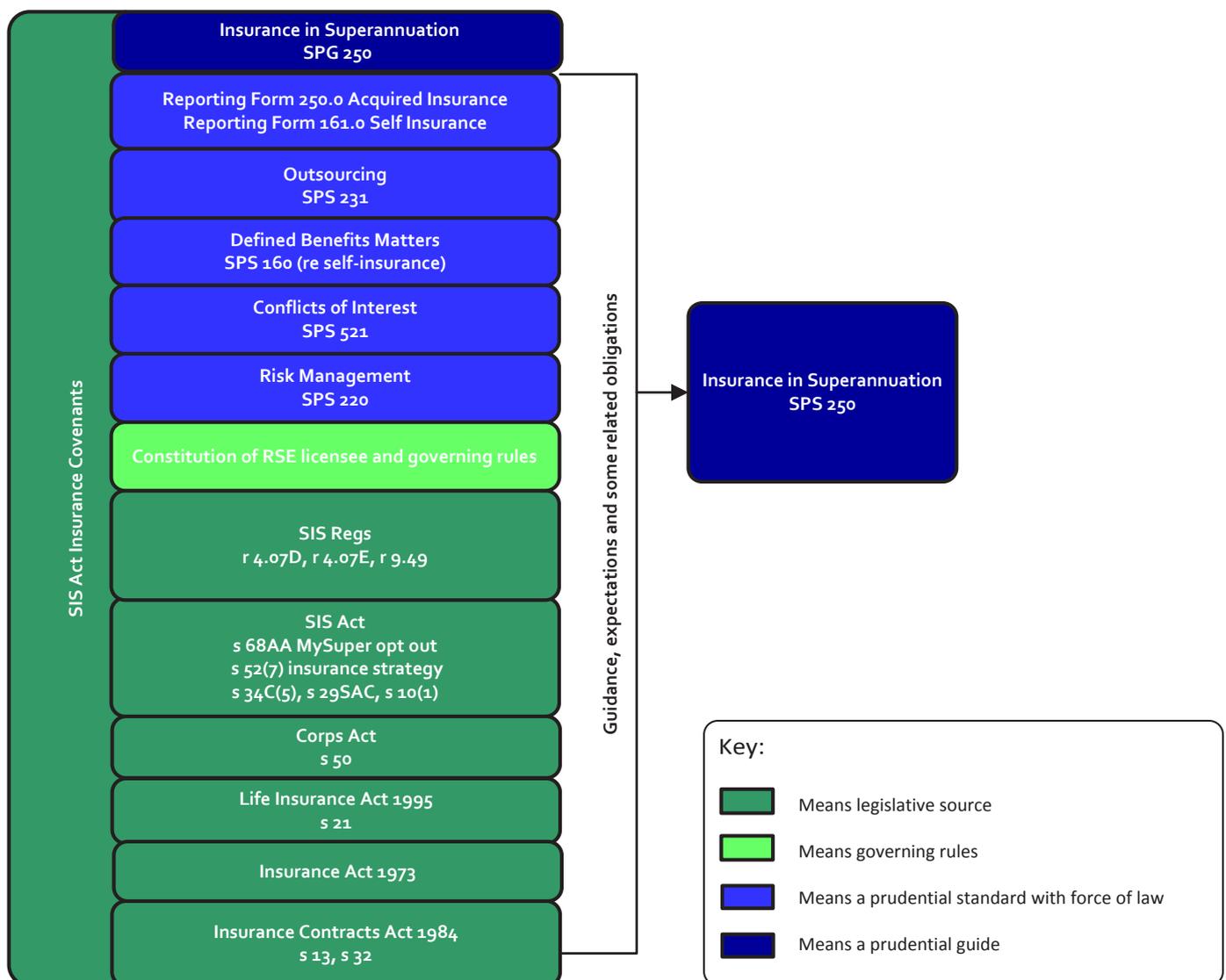
1.6 Obligations Map

The **Insurance Management Framework** is a component of the **RSE licensee's** Risk Management and Governance frameworks. SPS 250 contains references to SPS 220 and SPS 521.

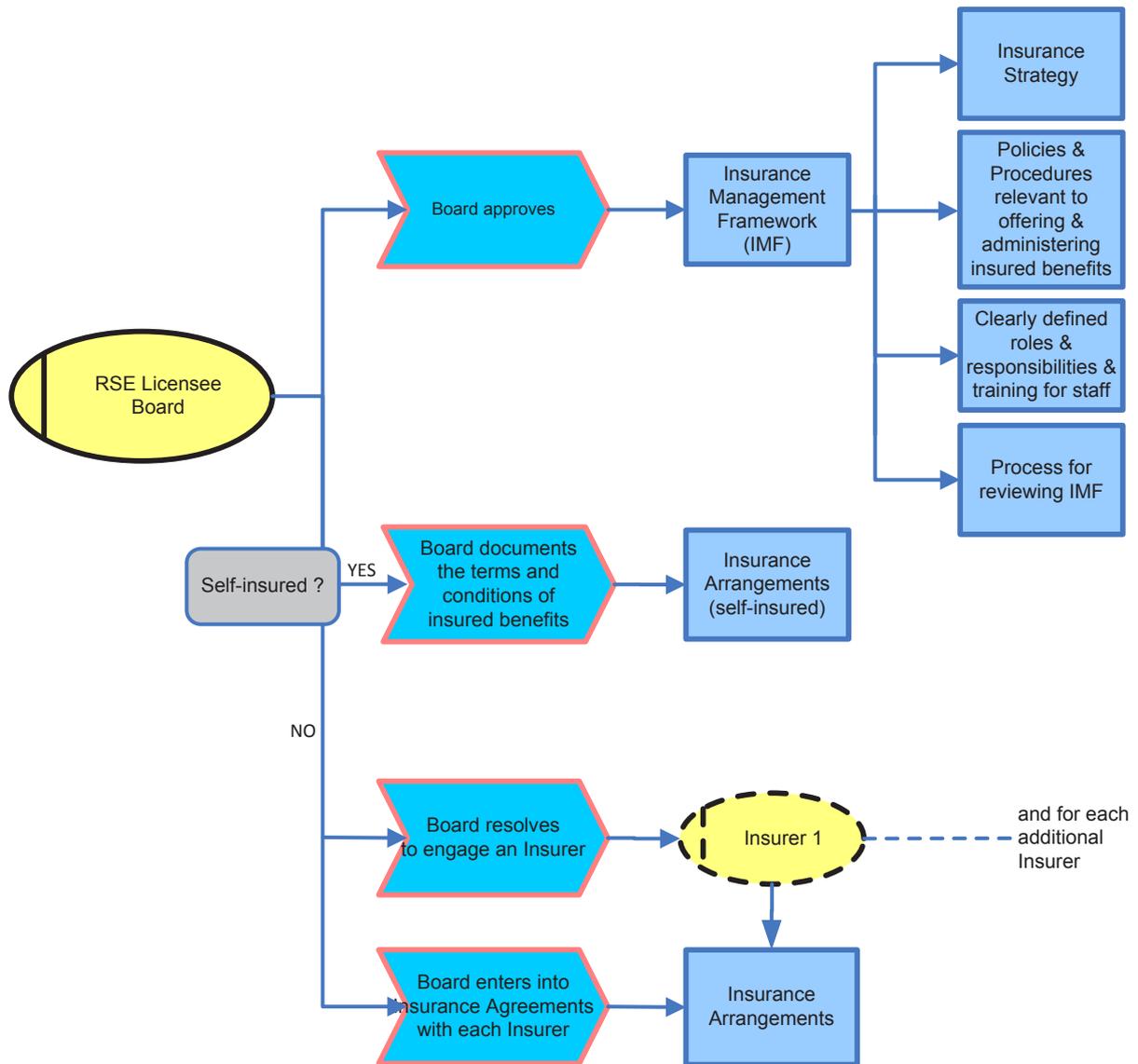
The **Risk Management Framework** (see **SPS 220**) must reflect the risks associated with making insured benefits available to beneficiaries as a material risk area. The regular review of the **Insurance Management Framework** should include a consideration of whether this is the case.

The **Conflicts Management Framework** (see **SPS 521**) must outline the approach to use in relation to conflicts that may arise through making available insured benefits to beneficiaries.

The **RSE licensee** is required to report information about its insurance to APRA in accordance with Reporting Form SRF 250.0 *Acquired Insurance* or, if self-insured, in accordance with Reporting Form SRF 161 *Self insurance*.



1.7 Implementation Flowchart



Key:

- means an organisational unit
- means a process
- means a document output
- means optional implementation based on decision
- means external entity

2 Insurance Management Framework

The **RSE licensee** must have in place an **Insurance Management Framework** which includes its **Insurance Strategy** and the systems, structures, policies, processes and people required to manage the provision of insured benefits to members and beneficiaries and must include the specific components outlined in SPS 250. The following checklist will assist the **Trustee** in assessing whether its **Insurance Management Framework** complies with the minimum requirements in SPS 250 and with SPG 250.

2.1 Develop an Insurance Management Framework (IMF)

BOARD SIGN OFF	YES/NO
(a) Does the IMF include an Insurance Strategy (refer to section 3 of this Toolkit) which complies with the Insurance Covenants and contains the detail required by SPS 250?	
(b) Is the Board satisfied that the totality of systems, structures, policies, processes and people in the IMF (see below) is appropriate for making insured benefits available to beneficiaries?	
(c) Is the Board satisfied that the IMF is appropriate to the size, business mix and complexity of the RSE licensee's business operations and to the types of insured benefits that the RSE has made available?	
(d) Is the IMF approved and signed off by the Board?	
SYSTEMS	YES/NO
(e) Does the IMF require the RSE licensee to:	
i. maintain records of sufficient detail for a prospective insurer to properly assess the insured benefits that the RSE licensee makes available?	
ii. does the above include the maintenance of records for at least the previous five years which provide details of: (⚠️It may have to be longer than 5 years in light of (g) below)	
a. claims experience?	
b. membership?	
c. sum insured? and	
d. premiums paid in relation to beneficiaries?	
(f) Do the claims experience records allow the RSE licensee to identify and obtain reports on the following data: (⚠️APRA expects a Trustee may collect more than the following list):	
i. event type, i.e. the reason for the claim?	
ii. the date of the event giving rise to the claim?	
iii. the date on which the claim was notified?	
iv. the details of the insurance cover disclosed to the member on taking up the cover?	

SYSTEMS	YES/NO
v. the date the claim was admitted or denied? (death, permanent incapacity and terminal illness claims only)	
vi. the dates that payments started and ceased for each temporary incapacity claim?	
vii. each disputed claim and the reason for the dispute?	
viii. the date(s) the claim was paid?	
ix. the amount of the claim?	
(g) Can the RSE licensee demonstrate to APRA that the records management system maintains information beyond the expiry of insurance risk and for as long a period as is required taking into account the historical run-off pattern of claims and until the last claim payment is made?	
POLICIES	YES/NO
(h) Does the IMF include policies and procedures of the RSE licensee relevant to making insured benefits available to beneficiaries including:	
i. a policy for managing declined applications for insurance?	
ii. a policy for managing applications resulting in reduced cover or restrictions?	
iii. a policy for managing terminations of cover?	
iv. a policy for managing requests for reinstatement of cover?	
(i) Does the IMF include a policy for ensuring compliance with the requirements of the <i>Insurance Contracts Act 1984</i> ? APRA particularly expects this to cover the RSE licensee's duty of utmost good faith in its relationship with insurers. AIST also recommends this address the recent extension of this duty to a third party beneficiary, such as an insured under a group life policy, and also the new duty of disclosure of beneficiaries under s32. 	
PROCESSES	YES/NO
(j) Does the IMF include a review process to ensure the IMF remains appropriate and effective?	
(k) Does the review process have regard to the size, business mix and complexity of the RSE licensee's business operations and any subsequent changes to these factors?	
(l) Does the review process have regard to the extent of any changes to the external environment in which the RSE licensee operates?	
(m) Does the review process ensure that processes give effect to the Insurance Strategy appropriately?	
(n) Does the review process ensure that the Insurance Strategy is reviewed regularly?	

(o) Does the review process ensure that the administration of insurance is monitored and reviewed?

PROCESSES

YES/NO

(p) Does the review process provide for a review of the **IMF**, at least every three years, by an operationally independent, appropriately trained and competent person? Does such a review include consideration of whether the risks relating to making insured benefits available are adequately addressed by the **Risk Management Framework**? ⚠️ APRA expects an **RSE licensee** to undertake an objective annual review of the **IMF**.

(q) Does the **IMF** include a cost recovery process by which the cost of insurance premiums is recovered from the RSE(s)?

(r) Does the **IMF** include an underwriting process which details the criteria by which an application for insurance is assessed and approved or rejected?

(s) Does the **IMF** include a claims assessment process which details how individual claim applications will be assessed and paid or rejected?

(t) Does the claims assessment process include the process for dealing with complaints internally and if they proceed to the SCT?

(u) Does the **IMF** include a process for administering the relevant requirements in **RSE licensee law** with respect to an election by a member to opt-out of benefits provided by the **RSE licensee**?

(v) Does the **IMF** include a process by which APRA is notified as soon as practicable:

i. of any issues that the **RSE licensee** considers might materially affect its ability to make insured benefits available to beneficiaries?

ii. when an **Insurance Arrangement** is terminated, of transition arrangements and future strategies for continuing to make insured benefits available to beneficiaries?

(w) Does the **IMF** include a process of and controls for monitoring compliance with the **IMF**?

(x) Does the **IMF** include a process that supports timely communication to beneficiaries about the insured benefits to which they are entitled?

PEOPLE

YES/NO

(y) Does the **IMF** include clearly defined roles and responsibilities and lines of reporting for the oversight of the **IMF**?

(z) Does the **IMF** include a process of training or induction whereby all persons in roles relevant to insurance activities are made aware of the **IMF**?

3. Insurance Strategy

The **RSE licensee** must develop an **Insurance Strategy** which complies with the **Insurance Covenants** and, in addition, includes the specific components outlined in SPS 250. The following checklist will assist the **RSE licensee** with developing an **Insurance Strategy**.

3.1 Develop an Insurance Strategy

COMPONENT	YES/NO
(a) Does the Insurance Strategy , at a minimum, address:	
i. the kinds of insurance that are to be offered to, or acquired for the benefit of, beneficiaries?	
ii. the level, or levels, of insurance cover to be offered to, or acquired for the benefit of, beneficiaries?	
iii. the basis for the decision to offer or acquire insurance of those kinds, at those levels, having regard to the demographic composition of the beneficiaries?	
iv. the method by which the insurer(s) is/are to be determined?	
(b) Does the Insurance Strategy document consideration of the cost to all beneficiaries of offering or acquiring insurance of a particular kind and at a particular level?	
(c) Can the RSE licensee demonstrate that it only offers insurance of a particular kind, or at a particular level, if the cost of the insurance does not inappropriately erode the retirement income of beneficiaries?  An RSE licensee will need to make its own assessment of and seek advice on what would be 'inappropriate'.	
(d) In accordance with APRA's expectations, does the Insurance Strategy demonstrate consideration of:	
i. the relevant factors in relation to the selection and appointment of an insurer and how the risks relating to this selection are to be managed?	
ii. when insurance cover is to commence and the circumstances under which a member's eligibility for insurance cover would cease?	
iii. the level of underwriting needed for members to be provided with insured benefits?	
iv. what administrative capabilities are required, including ease of underwriting and claims processes, and whether these are currently available?	
v. for instance in the circumstances of a successor fund transfer, how existing insured benefits would be preserved?	
vi. how the RSE licensee expects to monitor the overall number and profile of beneficiaries covered under each insurance policy of the RSE licensee , considering the factors in SPG 250.28?	

COMPONENT	YES/NO
<p>vii. the particular benefits and risks of using a general insurance policy, in relation to the possible selection of a general insurer or Lloyd's underwriter?</p> <p>viii. the risks involved where it is necessary to enter into arrangements with more than one insurer (or where part of the insured benefit is reinsured) for making insured benefits available, i.e. risks related to maintenance and communication of complete and accurate member data where provided by multiple parties?</p>	
<p>ix. how beneficiaries will be made aware of the duty of disclosure which applies as a proposed life insured under the insurance policy?</p>	
<p>(e) Does the Insurance Strategy document how the Trustee will discharge its obligation to do everything that is reasonable to pursue an insurance claim for the benefit of a beneficiary, if the claim has a reasonable prospect of success?</p>	
<p>(f) Does the Insurance Strategy document the processes for monitoring, reviewing and renewing the insured benefits made available to beneficiaries?</p>	
<p>(g) Does the Insurance Strategy document the RSE licensee's approach to claims management, regardless of who is responsible for handling claims?</p>	
<p>(h) Does the Insurance Strategy document the RSE licensee's approach to conflicts that may arise through making available insured benefits to beneficiaries (in line with the Conflicts Management Framework)?</p>	

4. Insurance Arrangements

The following checklist covers the terms that must be documented in the **RSE licensee Insurance Arrangements** in accordance with the minimum standards in SPS 250 and APRA's expectations in SPG 250.

4.1 Minimum criteria (with some additional expectations as indicated)

COMPONENT	YES/NO
At a minimum, does the RSE licensee's Insurance Arrangements document:	
(a) the level and type of insured benefits made available, including any exclusions?	
(b) the term of the insured benefits?	
(c) any Automatic Acceptance Limits?	
(d) the availability of opt in and/or opt out cover?	
(e) the requirements for the beneficiaries' eligibility for, cessation of, and any reinstatement of entitlements to insured benefits where available?	
(f) the premium structure, including any variable components?	
(g) the procedures for notification and payment of claims?	
(h) the dispute resolution arrangements?	
In accordance with APRA's expectations, do these dispute resolution arrangements include:	
i. in relation to the management of disputes between the RSE licensee and the insurer:	
a. how disputes relating to claims are agreed upon?	
b. how disputes relating to underwriting are agreed upon?	
c. how disputes relating to premium payment are agreed upon?	
d. how disputes relating to renewal are agreed upon?	
e. how disputes relating to data are agreed upon?	
f. how disputes relating to service standards are agreed upon?	
g. how a dispute is to be escalated?	
ii. details of the RSE licensee's internal dispute resolution processes?	
(i) the agreed service standards?	
In accordance with APRA's expectations, do these service standards include, at a minimum, timeframes for:	
i. the provision of relevant member and claims information to the insurer?	

COMPONENT	YES/NO
ii. the processing of claims, including the time taken to undertake the initial assessment of a claim?	
iii. the claim decisions once all relevant information has been received?	
iv. when admitted claims are paid?	
v. the processing of underwriting requests and the communication of the outcome of underwriting decisions to beneficiaries?	
(j) reporting requirements for monitoring the agreed service standards?	
(k) the provision of complete claims information to the RSE licensee on an annual basis which, at a minimum, includes the information required to be maintained by the RSE licensee under paragraph 15 of SPS 250: the claims experience for the year, sum insured and premiums paid?	
(l) liability and indemnity arrangements?	
(m) review, termination and renewal provisions for the Insurance Arrangements ?	

4.2 APRA's additional expectations in SPG 250

COMPONENT	YES/NO
In addition, does the RSE licensee's Insurance Arrangements or other documents that are in place prior to the commencement of risk, address the following matters:	
(a) underwriting requirements, including the responsibilities of the insurer, the RSE licensee or any other party with respect to underwriting?	
(b) any reduction in benefits and premium loadings i.e. extra premiums charged to a member or group of beneficiaries based on specific conditions, including how beneficiaries are notified about additional premiums?	
(c) clearly defined conditions for when claims will be admitted or denied?	
(d) procedures for deducting premiums from beneficiaries' accounts and paying premiums to insurers?	
(e) procedures for notifying and paying claims, including the responsibilities of the insurer when communicating directly with beneficiaries?	
(f) continuation options including notification to beneficiaries?	
(g) liability and indemnity where the insurer outsources a material business activity relating to the insured benefits made available by the RSE licensee ?	
(h) liability and indemnity where incorrect data has been relied upon?	
(i) profit-sharing arrangements and experience commission terms, including their consistency with the undertaking provided under s. 29SAC of the SIS Act in relation to members with an interest in a MySuper product?	

5. Due Diligence process for selection, monitoring and renewal of Insurers

This checklist will assist the **RSE licensee** in considering whether it has a due diligence process which meets the minimum requirements of SPS 250 and APRA's expectations in SPG 250. ⚠️ This is not a substitute for the **RSE licensee's** own business judgement or expert advice from an insurance broker or other professional adviser.

5.1 Selection of insurers – selection process

COMPONENT	YES/NO
At a minimum, does the selection process require:	
(a) consideration of the prospective insurer's terms of cover and exclusions?	
(b) consideration of the prospective insurer's claims philosophy?	
In accordance with APRA's expectations, does consideration of the insurer's claims philosophy include consideration of:	
i. the insurer's history of rate of rejection of claims formally made?	
ii. the insurer's record of claims decisions being overturned by the SCT?	
iii. the reasonableness of the insurer's claims underwriting requirements?	
iv. the training and skills of the insurer's claims assessors?	
v. specific examples of claims paid and claims denied?	
vi. the processes which support procedural fairness for claimants, for example:	
a. formal service levels for processing claims and reporting against them?	
b. a process to ensure that all relevant information has been provided to it?	
c. a process that supports the appropriate review of a previous decision when new information comes to light?	
d. a process for paying interest on claims? and	
e. a process for keeping abreast of case law that might affect its decision making processes?	
(c) consideration of the reasonableness of the premiums to be charged?	
(d) consideration of the terms of any delegation to any other person of functions associated with making available insured benefits?	
(e) a Due Diligence review of the selected insurer? (see 5.3 below)	
(f) that documentation is kept to satisfy the Board and demonstrate to APRA that the engagement of the insurer was conducted at arm's length and is in the best interests of members?	

5.2 Selection of insurers – good practice in selection or tender process

COMPONENT	YES/NO
<p>In accordance with APRA's expectations, where a selection or tender process is conducted, does the RSE licensee:</p>	
(a) have in place appropriate delegations for conducting the selection or tender process, including the determination of the selection criteria?	
(b) ensure the Board or a Board Committee reviews and approves the selection criteria?	
(c) review and approve all information that is provided to prospective insurers as part of the process?	
(d) provide that information to all prospective insurers at the same time?	
(e) allow sufficient time for prospective insurers to properly assess the risk of providing the requested insurance?	
(f) have in place appropriate delegations for appointing the insurer at the conclusion of the selection process?	

5.3 Selection of insurers – due diligence process

COMPONENT	YES/NO
<p>In accordance with APRA's expectations, and when conducting a due diligence process, does the RSE licensee consider:</p>	
(a) whether the selection of an insurer is within the RSE licensee's Insurance Strategy ?	
(b) the costs of the insurance?	
(c) whether the insured benefits under consideration align with the best interests of beneficiaries more broadly?	
(d) the appropriateness of the terms and conditions of the insurance cover provided to any given group of beneficiaries, including:	
<ul style="list-style-type: none"> i. takeover terms? 	
<ul style="list-style-type: none"> ii, continuation options including that the cost and terms of these options are fair and clearly communicated to relevant beneficiaries? 	
(e) the services offered by the insurer under the agreements accompanying the insurance policy, including claims and data management, underwriting and reporting provisions?	
(f) the long term viability or sustainability of the insured benefits and the insurer itself including:	
<ul style="list-style-type: none"> i. the insurer's access to capital? 	

COMPONENT	YES/NO
ii. the insurer’s relevant resources, experience and practice in claims management?	
iii. any additional risks that may be involved in increasing benefits made available to beneficiaries (e.g. increasing automatic acceptance levels and/or life-style increase options)?	
iv. tailored service models?	
v. the rate guarantee period?	
vi. the terms of any extension or new cover provided after termination of a policy and how this would be managed in relation to notices required to beneficiaries advising them of a change in insurance terms?	
(g) whether there is a history of significant litigation or claims against the insurer?	
(h) whether the directors of the insurance company are fit and proper people within the requirements of the RSE licensee’s own Fit and Proper Policy?	
(i) whether the insurer has the appropriate AFSL authorisations and complies with its AFSL obligations?	
(j) Can the RSE licensee demonstrate to APRA that the selection process and due diligence review process is appropriate and has been applied appropriately?	

5.4 Monitoring of Insurers – minimum requirements

COMPONENT	YES/NO
Does the RSE licensee have sufficient and appropriate resources to manage and monitor its relationship with the insurer at all times including to:	
(a) maintain regular contact with the insurer at an appropriate frequency and level of seniority?	
(b) regularly monitor performance under the Insurance Arrangements in accordance with service standards?	
(c) regularly report to senior management against the service levels under the Insurance Arrangements ?	
(d) manage the risks related to making insured benefits available to members?	

5.5 Renewal of service agreements with Insurers

COMPONENT	YES/NO
Does the RSE licensee use the same Due Diligence review process as is used for the selection of an insurer when determining whether to renew and existing relationship with an insurer?	

6 Dictionary

Corporations Act means *Corporations Act 2001*.

Insurance Arrangements means either:

- (a) the insurance policy document, where the **RSE licensee** makes insured benefits available by way of insurance acquired from a life company registered, or taken to be registered, under section 21 of the *Life Insurance Act 1995* or a general insurance company or Lloyd's underwriter authorised, or taken to be authorised, under the *Insurance Act 1973* (an insurer); or
- (b) appropriate documentation of the terms and conditions of the insured benefits and any accompanying agreements with any other party for the provision of services related to making available the insured benefits, where insurance is offered under the **RSE licensee's** self-insurance arrangements.

Insurance Covenants means the covenants that are included in the governing rules of a registrable superannuation and set out in s52(7) of the **SIS Act**, requiring an Insurance Strategy and imposing duties relating to costs of insurance, kinds of insurance offered and pursuit of an insurance claim for the benefit of a beneficiary if it has reasonable prospects of success.

Insurance Management Framework or **IMF** means all the systems (including record management systems), structures, policies, processes and people the **RSE licensee** has put in place in order to make insured benefits available to beneficiaries.

Insurance Strategy means the **RSE licensee's** approach to all aspects of providing insured benefits to members and beneficiaries.

Registrable superannuation entity (RSE) means

- (a) a regulated superannuation fund; or
- (b) an approved deposit fund; or
- (c) a pooled superannuation trust;

but not a self-managed superannuation fund.

RSE licensee means an entity that holds an RSE licence granted under s29D of the SIS Act. It is used interchangeably in this Toolkit with **Trustee**.

RSE licensee law has the meaning given in section 10(1) of the **SIS Act**.

SIS Act means the *Superannuation Industry (Supervision) Act 1993*. Provisions relevant to Prudential Standard SPS 250 and this Toolkit are:

- (a) section 29SAC;
- (b) section 52(7); and
- (c) section 68AA

SIS Regs means the *Superannuation Industry (Supervision) Regulations 1994*. Provisions relevant to Prudential Standard SPS 250 and this toolkit are:

- (a) regulation 4.07D;
- (b) regulation 4.07E; and
- (c) regulation 9.49.

Notes

Prepared by:



AUSTRALIAN INSTITUTE OF SUPERANNUATION TRUSTEES

Ground Floor, 215 Spring Street, Melbourne VIC 3000

www.aist.asn.au



MILLS OAKLEY LAWYERS

Melbourne

Level 6, 530 Collins Street, Melbourne VIC 3000

Sydney

Level 12, 400 George Street, Sydney NSW 2000

Brisbane

Level 14, 145 Ann Street, Brisbane QLD 4000

www.millsoakley.com.au