

LEGAL, REGULATORY & POLICY UPDATE

PENSIONS AND SUPERANNUATION

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IN BRIEF

July saw the 2021-22 financial year kick off with the release of key exposure draft legislation, a position paper from Government, information from regulators and some important rulings from the Federal Court.

The Government released for consultation the **Financial Accountability Regime draft Bill** along with an information paper and questions and answers and draft legislation that would establish the **Compensation Scheme of Last Resort**. The Government also released, after its initial consultation in 2018, the **Retirement Income Covenant Position Paper**, which is intended to reflect feedback obtained in the prior consultation and present the Government's refined policy.

We also saw APRA write to RSE licensees regarding the **Your Future, Your Super reforms**. Separately, ASIC continues its focus on Insurance in Superannuation with the issuance of its **TPD insurance: Progress made but gaps remain report**.

APRA continues to update its **Frequently Asked Questions – Superannuation Data Transformation** in advance of the first reporting due date in September. ASIC issued additional information on the new **IDR regime coming into force in October**.

The Federal Court issued Orders in two ASIC enforcement actions finding breaches of the Corporations Act and ASIC Act.

MAJOR UPDATES



Commonwealth Parliament

July 2021
Parliamentary Business

[LINK TO DETAILS](#)

Commonwealth Parliament did not sit in July. The following superannuation related bills remain before Parliament:

- [Treasury Laws Amendment \(2021 Measures No. 1\) Bill 2021](#)
- [Treasury Laws Amendment \(2020 Measures No. 4\) Bill 2020](#)
- [Security Legislation Amendment \(Critical Infrastructure\) Bill 2020](#)
- [Financial Sector Reform \(Hayne Royal Commission Response—Better Advice\) Bill 2021](#)
- [Treasury Laws Amendment \(2021 Measures No. 5\) Bill 2021](#)

Parliament resumes on 3 August 2021.

Superannuation trustees should remain apprised of bill status to ensure preparedness for any required change implementation, including ensuring adequate planning and resources are in place.



Financial Accountability Regime

16 July 2021
Draft Legislation

[LINK TO DETAILS](#)

Treasury released for consultation the Financial Accountability Regime (FAR) package. The FAR is being prepared for introduction in the 2021 Spring sittings with commencement intended for RSE licensees from the later of 1 July 2023 or 18 months after commencement.

The exposure draft *Financial Accountability Regime Bill* would implement recommendations of the Financial Services Royal Commission to extend the Banking Executive Accountability Regime (BEAR) to all APRA-regulated entities, with joint administration by APRA and ASIC.

The FAR imposes four core sets of obligations on accountable entities (and significant related entities where relevant):

- Obligations on each accountable entity to take reasonable steps to conduct its business with honesty and integrity, with due skill, care and diligence, and in manner that prevents adverse impact on its prudential standing; to ensure that its accountable persons comply with their own accountability obligations and to ensure that its significant related entities also comply with the accountability obligations;
- accountability obligations of accountable persons (directors, CEO and direct report executives, including prescribed roles) requiring that each accountable person is to act with honesty and integrity, with due skill, care and diligence, and in a manner that prevents adverse impact to the entity's prudential standing; to deal in an open, constructive and cooperative way with APRA and ASIC; and to take reasonable steps, in conducting their responsibilities, to ensure the accountable entity complies with certain laws;
- deferred remuneration obligations related to variable remuneration directors and executives; and
- notification obligations, including enhanced notification obligations for superannuation trustees holding over \$10 billion in assets.

Treasury is seeking feedback to the consultation by 13 August 2021.

Superannuation trustees should review the consultation materials, consider submitting a response to the deadline and begin planning its FAR implementation, including a review of governance arrangements and risk management practices and identification of accountable persons.



Compensation Scheme of Last Resort

16 July 2021
Draft Legislation

[LINK TO DETAILS](#)

Treasury released for public consultation exposure draft legislation that would establish the Compensation Scheme of Last Resort (CSLR).

The draft legislation contains the key features of the scheme, including the ability to authorise an operator of the scheme, eligibility requirements, compensation available for each eligible AFCA determination, the levying framework to fund the scheme, and governance of the scheme.

To support the draft legislation, the Government has also released a proposals paper, which outlines the Government's proposals in relation to various aspects of the CSLR. These aspects include scope, payment arrangements, funding arrangements, governance and mechanisms to maintain the integrity of the scheme.

Submissions close on 13 August 2021.

Superannuation trustees should note the materials released by Treasury and keep apprised of the status of the legislation and consider the impact that related levies may have on forward budgeting.



Retirement Income Covenant

19 July 2021
Position Paper

[LINK TO DETAILS](#)

Treasury released its *Retirement Income Covenant Position Paper* for consultation. The Paper reflects feedback from the consultation process that occurred in June 2018 and presents the Government's refined policy, with the aim of guiding trustees ahead of the covenant being legislated and taking effect from 1 July 2022.

The Paper provides that the Government intends to introduce legislation amending the SIS Act to include a covenant requiring trustees to formulate, review regularly and give effect to a retirement income strategy for the retired members of their fund, and the members of their fund approaching retirement. The Government proposes that the strategy:

- can be formulated for all members generally or cohorts of members in generality, as identified by the trustee;
- should outline how the trustee intends to assist their members to achieve the following objectives: maximise retirement income; manage risks to the sustainability and stability of their income; and have some flexible access to savings during retirement. Where the objectives compete, the strategy should identify how the trustee will assist members to balance the objectives.

Trustees should develop strategies that reflect the trustee's broad understanding of when and how members, or cohorts of members, retire based on surveys of retirement ages or expected retirement ages; key retirement policy settings; and broad demographic information. There is, however, no requirement for trustees to offer a particular retirement income product to members.

APRA will publish guidance on how trustees can meet the retirement income strategy requirement, consistent with the approach taken to guidance for other strategies required by the SIS Act.

Trustees would be required to have a retirement income strategy in place by 1 July 2022. Submissions are due by 6 August 2021.

Superannuation trustees should carefully review the Position Paper to determine if the Government's proposed approach is workable for its membership and consider submitting feedback.



TECHNICAL CHANGE AND UPDATES



IDR Data Dictionary

19 July 2021
Pilot

[LINK TO DETAILS](#)

ASIC released the internal dispute resolution (IDR) data dictionary, IDR data glossary and REP 693 Response to submissions on ASIC's IDR data consultations. The data dictionary sets out the information that financial firms will be required to collect and report to ASIC. The data glossary provides explanations about the key terms in the data dictionary.

The reporting documents will be tested in a pilot involving financial firms from across the relevant industry sectors in late 2021. This release represents the next step in preparedness for ASIC's implementation of the Government's mandatory IDR data reporting framework. According to ASIC, financial firms, including superannuation funds, should now consider how to map their own complaints systems to the data dictionary.

Superannuation trustees should review the data dictionary and glossary and begin mapping their complaints systems (including complaints managed by service providers) to the ASIC data dictionary. ASIC has confirmed that it will not seek retrospective data, therefore trustees should test their ability to report in accordance with the dictionary before reporting becomes mandatory.



APRA Reporting

16 July 2021
Guidance

[LINK TO DETAILS](#)

APRA has published additional frequently asked questions (FAQs) and worked examples for superannuation licensees to provide further guidance on meeting the Reporting Standards for Phase 1 of the Superannuation Data Transformation. The latest release of worked examples relate to SRS 550.0 Asset Allocation, SRS 705.0 Components of Net Return, SRS 705.1 Investment Performance and Objectives and SRS 706.0 Fees and Costs. A new release of FAQs has also been published which includes a clarification on FAQ 1.09 for the historical reporting requirements to confirm that this applies to quarterly and annual reporting.

APRA is releasing FAQs and worked examples to clarify reporting issues raised by RSE licensees and to help them meet their reporting obligations. APRA will continue to inform reporting entities and subscribers of updates to the FAQs and worked examples as they are released in the lead up to the first collection of data under the new Reporting Standards on 30 September 2021.

Superannuation trustees should ensure that its team tasked with APRA reporting is aware of the guidance and prepared for the new Reporting Standards to come into effect.



Conflicted Remuneration

16 July 2021
Report

[LINK TO DETAILS](#)

ASIC released its report *Ending Grandfathered Conflicted Remuneration*. The Report details ASIC's investigation of the industry's transition away from grandfathered conflicted remuneration arrangements and sets out ASIC's findings as to the steps taken by industry from 1 July 2019 to December 2020 to: end the payment of grandfathered conflicted remuneration ahead of the legal requirement to end these arrangements; and pass previously grandfathered benefits on to product holders.

According to the Report, nearly all issuers ended grandfathered conflicted remuneration arrangements before the 1 January 2021 deadline with a small number of product issuers that still have arrangements in place that require them to rebate previously grandfathered amount from 1 January 2021.

Superannuation trustees should note the report.



Financial Advisor Reference Checking

19 July 2021
Legislative Instrument

[LINK TO DETAILS](#)

ASIC released *ASIC Corporations and Credit (Reference Checking and Information Sharing Protocol) Instrument 2021/429* that gives effect to the Financial Services Royal Commission recommendations to improve reference checking in the financial advice (and mortgage brokering) industries. ASIC has also prepared an [information sheet \(INFO 257\)](#) and published [examples of references](#) as a guide.

This Protocol supports the measures contained within the *Financial Sector Reform (Hayne Royal Commission Response) Act 2020*, and sets out different obligations for recruiting and referee licensees. Recruiting licensees must take reasonable steps to obtain a reference from a referee licensee before employing or authorising a prospective representative. To enable licensees to share information honestly and frankly, the defence of qualified privilege applies when information is shared in accordance with the ASIC protocol (does not apply in relation to information that is not required to be shared). The Act, and the ASIC Protocol, commence on 1 October 2021.

Superannuation trustees should review the ASIC Protocol and accompanying guidance to ensure employment procedures and associated reference checks are performed in accordance with the new legislation.



Superannuation Guarantee Charge

29 July 2021
Provisional Guidance

[LINK TO DETAILS](#)

The ATO released *Draft Law Administration Practice Statement Remission of additional superannuation guarantee charge* (PS LA 2021/D1) for consultation. The draft Practice Statement outlines the Commissioner's revised approach in relation to the remission of additional super guarantee charge imposed under Part 7 of the *Superannuation Guarantee (Administration) Act 1992* (SGAA).

The draft Practice Statement sets out what the Commissioner needs to consider in making a decision on the remission, in whole or part, of the additional super guarantee charge (SGC) imposed under subsection 59(1) of the SGAA where an employer fails to lodge a super guarantee statement by the lodgement due date. This additional SGC is referred to as the 'Part 7 penalty'. The Statement also details when penalty relief may be applied.

Although not directly impacted, superannuation trustees should note the statement.



Non-Arm's Length Income

29 July 2021
Ruling

[LINK TO DETAILS](#)

The ATO released Law Companion Ruling *LCR 2021/2 Non arm's length income – expenditure incurred under a non-arm's length arrangement*. This seeks to clarify how the amendments to section 295-550 of the *Income Tax Assessment Act 1997* (ITAA 1997) operate in a scheme where the parties do not deal with each other at arm's length and the trustee of a complying superannuation entity incurs non-arm's length expenditure (or where expenditure is not incurred) in gaining or producing ordinary or statutory income.

The amendments apply in relation to income derived in the 2018-19 income year and later income years, regardless of whether the scheme was entered into before 1 July 2018.

Superannuation trustees should note the revised Ruling and ensure fund accounting teams are aware of the amended interpretation.



GUIDANCE AND POLICY



APRA Letter on Your Future Your Super

30 July 2021
Letter

[LINK TO DETAILS](#)

APRA issued a letter to RSE licensees setting out its expectations regarding the Your Future Your Super reforms that took effect 1 July 2021 and outlining its plans for implementing the reforms.

APRA notes the new best financial interests requirement, and reminds trustees they must have already:

- taken immediate steps to initiate changes to practices where necessary, to meet the new legal obligations; and
- reviewed internal frameworks, policies and processes to identify and address areas that need to be strengthened in light of the reforms.

APRA is currently engaging with each licensee to understand how they are complying with the new obligations and will take action where licensees have failed to adequately respond to the reforms.

APRA's implementation of the reforms will involve three core components: (1) administering the performance test; (2) enhancing standards on investment governance; and (3) reporting on the findings from a thematic review of RSE licensee expenditure management.

APRA will conduct the first MySuper product test and distribute results to licensees by 31 August 2021. Ahead of undertaking the test, APRA will write to any RSE licensee affected by the application of APRA's discretion to combine historical product performance. After the first test, APRA will engage with licensees considered to be at material risk of failing the test a second time to understand their plans to improve performance and their contingency plans to deal with implications of a second performance test failure.

Separately, APRA has confirmed their intention to:

- continue to publish its superannuation heatmaps – first Choice Product Heatmap in November 2021 followed by third MySuper Product Heatmap in December 2021;
- in the coming weeks, publish a report on the findings of the *Thematic review of unlisted assets valuation* and consult on proposed changes to SPS 530 Investment Governance and associated guidance;
- publish a report on the key findings from the *Thematic review of fund expenditure* and collect data on the expenses of each fund on a look-through basis using more granular categories, as part of APRA's Superannuation Data Transformation program;
- consult on revisions to SPS 515 Strategic Planning and Member Outcomes and associated guidance in 2022.

Superannuation trustees should review the letter to understand APRA's expectations and ensure that work is well underway to ensure compliance with the new requirements, specifically the best financial interests duty as it related to expenditure management.



Record of Advice

July 2021
Announcement

[LINK TO DETAILS](#)

ASIC released an *Example Record of Advice* to help financial advisers when they are providing advice under ASIC's temporary COVID-19 relief measure in [ASIC Corporations \(COVID-19 – Advice-related Relief\) Instrument 2021/268](#). Under the instrument, advisers can provide a Record of Advice, rather than a Statement of Advice to existing clients requiring financial advice due to the impact of the pandemic.

The example provided by ASIC is annotated to help advisers understand the relevant requirements. ASIC cautioned that the example is just an example and is confined to the particular facts in the scenario and the requirements under the Corporations Act.

Superannuation trustees should note the guidance.



Anti-Hawking

21 July 2021
Announcement

[LINK TO DETAILS](#)

ASIC issued *Consultation Paper 346 Update to RG 38 and Draft Regulatory Guide 38 The hawking prohibition* for consultation. The updated regulatory guide reflects reforms to the anti-hawking regime under the *Financial Sector Reform (Hayne Royal Commission Response) Act 2020*, which commences on 5 October 2021.

ASIC is proposing to update and clarify:

- the forms of contact that are subject to the prohibition;
- the nature of the consent that is required from a consumer who wishes to be contacted about a financial product; and
- what is required to establish consumer consent.

ASIC also proposed to add guidance on a consumer's right to return a product and be refunded when there has been a breach of the hawking prohibitions.

The consultation is open until 17 August 2021.

Superannuation trustees should review the proposed changes and its current practices to ensure that any current practices do not violate the new prohibitions.



Affordable Advice

1 July 2021
Announcement

[LINK TO DETAILS](#)

ASIC released an infographic summary of the response to [Consultation Paper 332 Promoting access to affordable advice for consumers](#) (CP 332). The infographic sets out the key issues raised by respondents in their submissions to CP 332 (ASIC received 466 submissions from financial advisers, licensees, industry associations and relevant stakeholders).

ASIC undertook the consultation seeking input from financial advice industry participants and stakeholders to understand the issues and impediments impacting the supply of good quality affordable personal advice, and the practical steps that can be taken by ASIC and the industry to improve consumer access to the same.

Respondents identified overheads and fixed costs; Statement of Advice preparation; rising regulatory costs; and conservative licensee policies and procedures requiring compliance above what is required by law as contributing to the cost of advice. 146 respondents supported allowing greater use of records of advice.

Superannuation trustees should note the infographic.



Cyber Security

13 July 2021
Consultation

[LINK TO DETAILS](#)

The Department of Home Affairs released *Strengthening Australia's cyber security regulations and incentives* for consultation, seeking feedback about how the Australian Government can incentivise businesses to invest in cyber security, including through possible regulatory changes.

Feedback is sought across three areas:

- Setting clear cyber security expectations through cyber security standards for corporate governance, personal information and smart (internet of things) devices;
- Increasing transparency through cyber security labelling for smart devices, software vulnerability disclosure policies, and health checks for small businesses;
- Protecting consumer rights through appropriate legal remedies for victims.

The paper refers to the regulatory regime for cyber security in the finance sector as an example of a "mature regulatory regime." However, the paper seeks feedback articulating cyber security governance standards in respect of a wider range of businesses, specifically those that are large businesses. This could include setting voluntary or mandatory standards, further education and capability raising, or both.

This work is an initiative of *Australia's Cyber Security Strategy 2020* and progresses recommendations of the *2020 Cyber Security Strategy Industry Advisory Panel*. It also complements the Government's [critical infrastructure reforms](#) and the [Review of the Privacy Act 1988](#).

Written feedback is due on 27 August 2021.

Superannuation trustees should review the consultation paper and consider providing a response.



ASIC Cost Recovery

23 July 2021
Consultation

[LINK TO DETAILS](#)

ASIC published its draft *Cost Recovery Implementation Statement (CRIS)* for 2020-21, which outlines ASIC's estimated regulatory costs and how these will be recovered as industry levies under the industry funding model.

The indicative levies published in the CRIS are based on ASIC's planned regulatory work and associated costs for the 2020-21 financial year. Final industry levies will be based on ASIC's actual regulatory costs and the business metrics submitted by entities in each subsector. Final levies will be published in December 2021 and invoiced in January 2022.

ASIC is seeking submissions to the consultation by 13 August 2021.

Superannuation trustees should note the estimated costs and ensure fund accounting teams are made aware of the figures.



TPD Claims

2 August 2021
Report

[LINK TO DETAILS](#)

ASIC issued Report 696 *TPD insurance: Progress made but gaps remain*. The report considers how nine life insurers are addressing the consumer harms identified in ASIC's 2019 Report 633 *Holes in the safety net: A review of TPD insurance claims*.

Relevant findings of the report include:

- Most insurers have completed self-assessments against REP 633;
- All insurers have started discussion with trustees about restricted TPD definitions to improve consumer outcomes;
- There is a trend to broaden the eligibility criteria to assess consumer under "any" or "own" occupation definition, and to include mental health criteria in TPD definition;
- Insurers have improved some claims handling practices, lowering hurdles;
- Insurers found shortcomings in their capabilities.

The report notes that it "is a timely reminder for insurers and trustees about taking steps to meet the new design and distribution obligations from 5 October 2021, which apply to Choice superannuation products (including any attached insurance cover)" and "Insurers and trustees should use complaints data better to identify and respond to potential systemic issues in their businesses relevant to TPD insurance to comply with updated internal dispute resolution requirements from 5 October 2021." Additionally, "Trustees also need to enhance their data capability for insurance in superannuation."

Superannuation trustees should review ASIC's report and consider whether they have adequately reacted in response to ASIC's various reports on insurance in super, and in particular consider insurance and data capabilities in implementing the DDO and IDR reforms.



Foreign Financial Service Providers

9 July 2021
Consultation

[LINK TO DETAILS](#)

As announced in the 2021-22 Budget, Treasury released a consultation on options to restore previously well-established relief for Foreign Financial Service Providers (FFSPs) and options to create a fast-track licensing process for those that wish to establish more permanent operations in Australia.

Options for establishing a framework for FFSPs included three options: (1) restoring previous relief; (2) relief for certain financial services provided to wholesale clients; and (3) relief for all financial services provided to wholesale clients.

Options for fast-tracking the licensing of FFSPs also included three options: (1) Amend the fit and proper person test; (2) a modified licensing regime for FFSPs dealing with wholesale clients; and (3) provide automatic licensing relying on an overseas licence held by the FFSP.

Submissions closed on 30 July 2021.

Superannuation trustees should note the consultation, and consider any changes required to its due diligence processes required for ant foreign financial service providers relied on by the trustee.



ENFORCEMENT ACTIVITY AND CASE LAW



ASIC vs AMP

30 July 2021
Civil penalty proceeding

[LINK TO DETAILS](#)

ASIC has commenced civil penalty proceedings in the Federal Court against six companies that are, or were, part of the AMP Limited group, alleging these entities charged fees for no service on corporate superannuation accounts.

ASIC alleges the AMP companies charged general advice fees to more than 1,500 customers despite knowing that those members had ceased employment with the employer-sponsor, were transferred to the retail category, and were not receiving the advice. ASIC alleges AMP received over \$600,000 in advice fees from affected customer accounts.

ASIC further alleges that from July 2015 to April 2019, the AMP companies:

- deducted financial advice fees from 1,540 customers' superannuation accounts despite being aware that the customer had left their employer-sponsored superannuation account and therefore could not access the advice for which those fees were paid;
- failed to ensure that a system was in place that did not charge customers who had left their employer-sponsored account; and
- contravened their obligations as Australian financial services licensees to act efficiently, honestly and fairly.

ASIC is seeking declarations that the AMP companies contravened section 912A of the *Corporations Act* and 12DI of the *ASIC Act*, with pecuniary penalties and adverse publicity orders to be made by the Federal Court.

This action follows proceedings commenced by ASIC in May 2021 against several AMP companies alleging that they had charged life insurance premiums and advice fees to more than 2,000 customers despite being notified of their death.



ASIC vs Tidswell

27 July 2021
Court Order

[LINK TO DETAILS](#)

The Federal Court has found Tidswell Financial Services Ltd (Tidswell) failed "to do all things necessary to ensure that the financial services provided by Tidswell and covered by its [AFSL] in relation to the MobiSuper Division of the Tidswell Master Superannuation Plan [...] were provided efficiently, honestly and fairly".

The Court found that between 30 November 2016 and 14 February 2018, while it was a superannuation trustee, Tidswell:

- failed to adequately monitor MobiSuper, the promoter of one of its superannuation sub-funds, to ensure business model risks were addressed, including prevention of false or misleading representations and the risk of giving unauthorised personal advice; and
- failed to comply with Prudential Standard SPS 231 Outsourcing.

The Court made orders by consent that Tidswell had breached s912A(1)(a) of the *Corporations Act* and dismissed by consent ASIC's remaining claims against Tidswell. Tidswell has applied to APRA to cancel its RSE licence, however, if the licence is not cancelled within 30 days of the order, the Court stated that "ASIC has liberty to apply for further orders in relation to the same."



ASIC vs BT and Asgard

26 July 2021
Court Order

[LINK TO DETAILS](#)

The Federal Court has imposed civil penalties totalling \$3 million against BT Funds Management Limited (BT) and Asgard Capital Management Limited (Asgard) for charging fees for no service and making misleading statements. BT and Asgard were also ordered to publish an Adverse Publicity Order on their websites.

The Court found that between September 2014 and August 2017, on at least 487 occasions, BT and Asgard had contravened ss 12DA(1) and 12DB(1)(g) of the *ASIC Act*, and s1041H of the *Corporations Act*, by:

- making false or misleading representations to customers in customer account statements that no deductions of ongoing adviser fees were being made from customers' accounts after those customers requested to remove their financial advisers from their accounts; and
- engaging in misleading or deceptive conduct by providing customers with account statements which did not show that BT and Asgard were continuing to deduct an ongoing adviser fee from customers' accounts after those customers requested to remove their financial advisers from their accounts.

The Court also found Asgard had breached its obligation to do all things necessary to ensure the financial services covered by its financial services licence were provided efficiently, honestly and fairly, and contravened s912A of the *Corporations Act* by putting in place ineffective processes and systems to cease charging adviser fees.

This occurred through erroneously applying a coding change to affected members which caused ongoing adviser fees to continue to be included in accounts but under the description of administration or account management fees; having ineffective controls in place to check that ongoing adviser fees were not being charged following a request to remove an adviser from an account; retaining ongoing adviser fees to which it was not entitled; and providing members with account information conveying confirmation that adviser fees were no longer charged.



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