OMVLEGAL

LEGAL & REGULATORY UPDATE

PENSIONS AND SUPERANNUATION

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IN BRIEF

Prior to an "eventful" 2020 coming to a close, we saw the Hayne Royal Commission Bills introduced to Parliament, with one of the two Bills passing into law. Regulations were also made to support the legislation. There were two notable changes, with an amendment deferring commencement of changes to indemnity prohibitions, and a policy change which would not see financial advice fee prohibitions applied to MySuper products.

It was also a busy month for the regulators, with ASIC commencing consultation on IDR related data collection, and its design and distribution obligations, and remediation conduct.

APRA also released its heatmap, and there were plenty of minor technical, yet important changes via regulation or legislative instrument.

Looking forward to a busy 2021 for superannuation trustees!

MAJOR UPDATES



Commonwealth Parliament

December 2020
Parliamentary Business



Commonwealth Parliament sat between 30 November and 10 December, and passed the following superannuation related legislation:

- Financial Sector Reform (Hayne Royal Commission Response) Act 2020
- Family Law Amendment (Western Australia De Facto Superannuation Splitting and Bankruptcy) Act 2020
- Treasury Laws Amendment (2020 Measures No. 5) Act 2020
- Treasury Laws Amendment (2020 Measures No. 6) Act 2020

We have provided a more detailed summary of this legislation in the following pages. The following superannuation related bills remain before Parliament:

- Financial Sector Reform (Hayne Royal Commission Response No. 2) Bill 2020
- Treasury Laws Amendment (More Flexible Superannuation) Bill 2020
- Treasury Laws Amendment (Reuniting More Superannuation) Bill 2020
- Treasury Laws Amendment (2020 Measures No. 4) Bill 2020
- Treasury Laws Amendment (Self Managed Superannuation Funds) Bill 2020

Parliament is next scheduled to sit between 2-4 February.

Superannuation trustees should commence with the implementation of any changes required due to this legislation and ensure that adequate planning and resources are in place to implement pending Bills if passed.







The Hayne Reforms

10 December 2020 Royal Assent Regulations made Bill introduced



The Financial Sector Reform (Hayne Royal Commission Response) Act 2020 passed both Houses of Parliament on 10 December and has received royal assent. The Act implements reforms relevant to superannuation trustees:

- Enforceability of certain terms of industry codes
- Prohibiting hawking of financial products
- Superannuation Trustees holding no other duty
- Breach reporting and remediation
- Broadening prohibitions on indemnification from trust assets
- Adjustment of APRA and ASIC's roles in superannuation & creating a statutory obligation to cooperate

The Treasurer also made the <u>Financial Sector Reform (Hayne Royal Commission</u> Response) (Regulation of Superannuation) Regulations 2020 to support the operation of the legislation.

The measure to broaden the existing prohibitions on indemnification from trust assets has been deferred until 1 January 2022, after amendments were moved in the Senate (and endorsed by the House of Representatives).

The Financial Sector Reform (Hayne Royal Commission Response No. 2) Bill 2020 was also introduced into Parliament on 9 December. The Bill seeks to implement the remaining Hayne Royal Commission reforms of ongoing fee arrangements, disclosure of lack of independence, and advice fees in super.

Importantly, the Bill departs form the draft legislation and Royal Commission recommendation in relation to advice fees in superannuation. The Bill would not prohibit the charging of advice fees to MySuper accounts, but rather create requirement that advice fees be paid in accordance with the terms of an arrangement that is not an ongoing fee arrangement.

For a summary of each of the superannuation related items covered by the bill see our most recent coverage of the Hayne Royal Commission Reforms.

Superannuation trustees should prioritise completing an impact assessment as soon as possible, as there is a short or no transition period before many of the measures commence.



Internal Dispute Resolution

16 December 2020 Consultation



ASIC is seeking feedback on proposed requirements for IDR data reporting. In response to its earlier consultation through Consultation Paper 311 Internal dispute resolution: Update to RG 165 ASIC has developed preliminary positions on a number of issues related to data reporting and set those positions out in detail in an addendum to CP311.

ASIC has also simplified the draft data dictionary reducing the number of data elements from 37 to 23 and aligned the data elements with those used by AFCA. Feedback on the proposed approach and the elements of the data dictionary is due by Friday, 12 February 2021.

While the new IDR standards and requirements will apply from 5 October 2021, the mandatory IDR reporting will not commence on that date with a pilot to test the data dictionary and ASIC's systems to occur in the second half of 2021.

Superannuation trustees should engage their complaints management team and those involved in the development of new systems to comply with reporting aspects, particularly data specialists, to gather views on the revised reporting proposal and data dictionary.

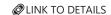






Design & Distribution **Obligations**

15 December 2020 Regulatory Guidance



ASIC released RG 274 Product design and distribution obligations which explains ASIC's interpretation of the design and distribution obligations, its expectations for compliance, and its general approach to administering the obligations.

ASIC also released REP 674 Response to submission on CP 325 on product design and distribution obligations highlighting key issues that arose from the consultation. The key superannuation related issues include:

- Change to the superannuation example on cash options to clarify the actions an issuer could take if the results of Target Market Determination (TMD) testing indicate that a product is not likely to meet the needs of the target market – alter its fee structure, elect not to offer the option or adjust the TMD or distribution arrangements.
- Revised superannuation example on how the TMD obligation applies to investment options as key attributes of a superannuation product, likely requiring the description of sub-markets for some investment options/groups of investment options.
- Amended superannuation example to clarify that trustees may consider the use of filters as part of the arrangements that they put in place to meet the reasonable steps obligation.
- Amended example to clarify that, due to the regulations, employers are not subject to the reasonable steps obligation when complying with certain superannuation guarantee obligations. Trustees should, however, consider welcome information for employees.
- No further guidance was made on the application of the obligations to reversionary pension interests, intra-fund transfers and superannuation splitting payments.

Superannuation trustees should familiarise themselves with the guidance and begin planning the implementation of DDO, if they have not already started. The regime requires compliance by 5 October 2021.



Family Law Splits

8 December 2020 Royal Assent



The Family Law Amendment (Western Australia De Facto Superannuation Splitting and Bankruptcy) Bill 2019 received royal assent. The Bill gives effect to a referral power from Western Australia to the Commonwealth in respect of superannuation matters in family law proceedings for separating de facto couples in Western Australia.

It will allow de facto couples in Western Australia to split their superannuation interests as part of their property settlements. All other property splitting for separated Western Australian de facto couples will continue to be dealt with under Western Australian law.

QMV Legal recommends that superannuation trustees ensure any processes and procedures associated with family splits are amended to reflect the change in







Member **Outcomes** & DDO

15 December 2020 Regulator correspondence



APRA and ASIC issued a joint letter to all RSE Licensees relating to their obligations under the member outcomes and product design and distribution regimes. The letter seeks to assist trustees to better understand the way in which the obligations interact. Key points related to:

- The regulators view is that the obligations are, in many ways, complimentary and trustees should look for opportunities to drive efficiencies (processes, system design, etc.) and learnings (e.g., data, etc.).
- Both regimes require the trustee to identify the needs of members; determine whether their decisions about choice product and broader business operations are delivering quality outcomes for members; and make decisions that are evidenced-based and to monitor and review product offerings and operations on an ongoing basis.

Key areas where the two regimes interact closely are:

- **Planning, reviews and adjustments** both regimes require that trustees make decisions based on the member outcomes they seek to achieve;
- Data the BPR and outcomes assessment requires reference to internal and external data and in meeting the DDO requirements ASIC expects trustees to collect and analyse relevant and reliable consumer, product performance, value and transaction data; and
- Insurance in super trustees may be able to use the same data for DDO and BPR/member outcomes as it relates to analysing the appropriateness and sub-target market for insurance.

Superannuation trustees should consider how they can leverage the work done to meet BPR and outcomes assessment obligations in implementing DDO, particularly as it relates to member profiling and monitoring and review.





TECHNICAL CHANGES AND UPDATES



APRA Heatmap

18 December 2020 **Announcement**



APRA released a refresh of its MySuper heatmap alongside an Insights Paper and updated frequently asked questions. APRA also published Deputy Chair Helen Rowell's speech to ASFA Briefing on the Heatmap. The paper shows that, in the 12 months since the first heatmap was published:

- While the majority of members are in performing MySuper products, there are over 900,000 member accounts and \$31.2 billion of members' benefits invested in the 6 MySuper products that are significantly underperforming;
- 11 of the MySuper products that underperformed the investment benchmarks have exited the industry;
- Funds with net assets over \$50 billion have experienced the strongest investment performance and underperformance of some products is due to high investment fees and costs;
- 71 per cent of MySuper members (10 million members) are paying less in total fees and costs;
- an estimated \$408 million saving in total fees and costs has been achieved; and
- The uncertain outlook is expected to present challenges for some funds in delivering sustainable member outcomes.

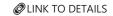
APRA is reviewing whether, in relation to 10 MySuper products, eight trustees may have failed in their obligations to members of these products, including possible breaches of the SIS Act. APRA intends to issue notices requiring these trustees to provide information to APRA related to the underperformance of some of their MySuper products and the actions being taken to address that underperformance.

Superannuation trustees should review APRA's heatmap and complete an analysis on the heat indicators attributed to the fund. Where there is a possibility of adverse reputational risk events, messaging could be developed in advance.



Direct to APRA

9 December 2020 **Announcement**



APRA released version 6 of Direct to APRA (D2A). Entities must download and install the new version by 31 March 2021.

D2A version 6 contains a number of important security updates and performance enhancements. These include:

- Integration of myGovID authentication;
- Increased memory resulting in quicker processing of submissions;
- Better business rule validations and error checks; and
- Updated branding.

Superannuation trustees can download D2A version 6 from APRA's website, which also contains installation instructions and an updated Help Guide.

APRA has also recommenced the APRA Connect project to deliver a new data collection solution and has released a revised implementation approach and timeline. APRA Connect, will ultimately replace D2A. Superannuation trustees should ensure their reporting specialists are aware of the D2A update and use the updated version for all submission made after 31 March 2021. APRA Connect will go live at the end of September 2021.







Minor & Technical Legislative **Amendments**

10 December 2020 Royal Assent



The Treasury Laws Amendment (2020 Measures No. 6) Act 2020 was passed by both Houses of Parliament and has received royal assent. The Act makes the following amendments:

- Competition and Consumer Act to reallocate the responsibility for conducting sectoral assessments and making consumer data rules, as well as other miscellaneous amendments.
- Superannuation Guarantee (Administration) Act 1992 to clarify that the ordinary time earnings base is only reduced by an amount of excluded salary or wages if that amount has been included as part of the ordinary time earnings base, and the only time a period is not a period of employment as a result of section 26 is when amounts paid to an employee in that period are excluded salary and wages.
- SIS Act to allow the trustee of a fund who offers a MySuper product to charge a greater number of differentiated investment fees to the different subclasses of members who hold the MySuper product, and to allow for insurance elections to remain valid through an SFT.
- Superannuation (Unclaimed Money and Lost Members) Act 1999 to provide that an account is not an inactive low balance account if the member has elected to maintain insurance on that account under section 68AAB(2). The amendments apply retrospectively from 1 April
- Income Tax Assessment Act 1997 to ensure that the market value substitution rule does not prevent the intended operation of the nonarm's length income rules. This confirms that a superannuation fund cannot claim a deduction for payment to a person under an income stream because of the person's temporary inability to engage in gainful employment, and to allow a superannuation provider that is a successor fund to claim the tax offset in an income ear for no-TFN tax previously paid by the original fund.

Superannuation trustees should review the amendments, particularly those dealing with MySuper charging rules and insurance elections to confirm any impact on current operations.



KiwiSaver

11 December 2020 Royal Assent

OLINK TO DETAILS

The Treasury Laws Amendment (2020 Measures No. 5) Act 2020 was passed by both Houses and received royal assent. The Act seeks to amend the Superannuation (Unclaimed Money and Lost Members) (SUMLM) Act 1999 and the ITAA 1997 to facilitate the payment of money held by the ATO directly to New Zealand KiwiSaver schemes.

Currently, under the Arrangement and associated legislation, retirement savings can only be transferred between Australian complying superannuation funds and New Zealand KiwiSaver schemes, which require New Zealand residents to first transfer their superannuation from the ATO to an Australian superfund and then request that the fund transfer their superannuation to KiwiSaver.

Superannuation trustees may wish to ensure that member service functions are aware of the changes, and that any online or published information about the fund refers to trans-Tasman consolidation where appropriate.

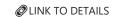






Minor & Technical Regulation **Amendments**

10 December 2020 Announcement



Treasury made Treasury Laws Amendment (Miscellaneous and Technical Amendments) Regulations 2020 with the purpose of making minor and technical amendments to regulations in the Treasury portfolio. The amendments relevant to superannuation include:

- Ensuring that permanent residents of New Zealand are eligible for early release of their superannuation on compassionate grounds relating to the coronavirus in accordance with the same policy settings that apply for Australian citizens, permanent residents of Australia and New Zealand citizens.
- Consequential amendments to the Corporations Regulations 2001 as a result of the Family Law Amendment (Western Australia De Facto Superannuation Splitting and Bankruptcy) Bill 2019.
- Repeal of subsection 12A(3) of the Superannuation Guarantee (Administration) Regulations 2018 as the amendment the Treasury Laws Amendment (2020 Measures No. 6) Bill 2020 related to excluded salary or wages makes this provision redundant.

Superannuation trustees should consider the impact of the changes in relation to New Zealand residents and release on compassionate grounds.



Portfolio Holdings Disclosure

8 December 2020 Extension



ASIC made ASIC Corporations (Amendment and Repeal) Instrument 2020/921 to amend Class Order [CO 14/443], deferring the commencement date of obligations under the Corporations Act for superannuation trustees in relation to portfolio holdings disclosure.

The class order amends the statute to provide that a superannuation trustee does not have to comply with subsection 1017BB(1) of the Act in relation to a reporting day occurring before 31 December 2021.

Disclosure of information about a fund's holdings is required on its website no later than 90 days from its reporting date (either 31 December or 30 June). Depending on when the regulations are made, however, ASIC has signalled that it may shorten the period of relief.

Superannuation trustees should commence planning for the implementation of any changes required to comply portfolio holdings disclosure obligations in 2021. While the obligations have been deferred on a number of occasions, it is expected that this will be the last deferral.



SuperStream

December 2020 Consultation



The ATO released the Superannuation Data and Payment Standards (Release Authorities, and SMSF Rollovers) Amendment 2020 for consultation, which seeks to:

- require trustees of **SMSFs to comply** with the Data and Payment Standard in relation to rollovers and transfers that are requested on or after 31 March 2021; and
- require trustees of SMSFs and APRA-regulated superannuation entities to comply with the Data and Payment Standard in relation to release authorities issued on or after 31 March 2021 by the ATO.

Feedback was due to the ATO by 4 January 2021.

Superannuation trustees should ensure that the administration business unit or service provider is aware of the changes and transition arrangements are in place







Derivative Transaction Rules

27 November 2020 Consultation



ASIC released Consultation Paper 334 Proposed changes to simplify the ASIC Derivative Transaction Rules (Reporting). The consultation paper sets out our first proposals to amend the ASIC Derivative Transaction Rules (Reporting) 2013 made under s901A of the Corporations Act.

The paper includes the following topics of consultation:

- the unique transaction identifier; the unique product identifier;
- the critical data elements; the legal entity identifier;
- the scope of reportable transactions and reporting entities; and
- alternative reporting and delegated reporting; and reporting requirements.

This is the first of two consultation papers to be released before amended rules are made and the regulatory guide amended. Comments to this consultation are due by 1 March 2021.

Superannuation trustees should have their investment reporting specialists review the consultation paper and consider providing feedback.



APRA-ASIC Engagement

22 December 2020 APRA-ASIC Update



APRA and ASIC published their first annual update on engagement between the two regulators.

The update refers to the regulators' collaboration in the following areas:

- In superannuation, the regulators worked together to ensure guidance to trustees was integrated and the development and implementation of a single pandemic data collection.
- In banking, both regulators worked together on measures to help customers facing loan repayment difficulties.
- Decisions on which entity should be lead regulator relating to conduct issues that can give rise to breaches of legal requirements under the respective remits of both regulators.
- Business interruption insurance and the test case with industry.
- Alignment of communication on key policy changes.

No action is requirement from superannuation trustees.



Payment Times Reporting

20 November 2020 Rules made



The Payment Times Reporting Rules 2020 were made following the passage of the Payment Times Reporting (Consequential Amendments) Bill 2020 which received royal assent on 14 October 2020.

The Bill established a Payment Times Reporting Scheme which requires businesses, including superannuation funds, with an annual total income of over \$100 million to biannually report on their payment terms and practices for their small business suppliers.

The Rules set out the technical and administrative details on how certain provisions operate in practice.

Superannuation trustees should review the rules to determine the extent of their obligations to participate in the scheme and report data related to any small business service providers.





POLICY & GUIDANCE



Value of Default Insurance

14 December 2020 Report

OLINK TO DETAILS

ASIC released Report 675 Default insurance in superannuation: Member value for money which presents findings from ASIC's project on measuring the value for money that Australians receive from default insurance provided by their superannuation funds.

The report highlights that:

- There is wide variation in default cover offered. Across MySuper products, ASIC found a large amount of variation in the types and level of default cover. Two identical members could receive very different cover, depending on which superannuation product they each have.
- Insurers expect to pay about 79 cents in claims, on average, for each dollar of premiums.
- Some groups of members may be receiving relatively low value for money. Different cohorts of members can receive different outcomes.
- Claims-handling indicators provide further insights into member value and potential harm.
- Trustees have shortcomings in data and analysis.

Superannuation trustees should consider the report findings, and any improvements that could be made to the monitoring and assessment of insured benefit related member outcomes.



Conflicted Remuneration

10 December 2020 Updated guidance

OLINK TO DETAILS

ASIC released technical updates to Regulatory Guide 246 Conflicted and other banned remuneration to reflect changes in the law. The updates reflect:

- the end of the grandfathering of conflicted remuneration for financial product advice from 1 January 2021; and
- the extension of the ban on conflicted remuneration to stamping fees paid in relation to listed investment companies and listed investment trusts (excluding real estate investment trusts) that took effect on 1 July 2020.

The ban on conflicted remuneration for financial product advice applies to all benefits given on or after 1 January 2021. Product issuers are required to provide rebates to clients for all previously grandfathered benefits that they remain legally obliged to pay on or after 1 January 2021.

Superannuation trustees should review operational financial advice processes to ensure compliance.







Modernising **Business** Communications

18 December 2020 Consultation



Treasury has released a consultation paper on Modernising Business Communications to obtain feedback from stakeholders that will assist the Government to:

- identify and categorise the types of business communications that would benefit from technology neutrality changes;
- develop principles to guide subsequent legislative change;
- identify legislative change that may be required to give effect to these principles and improve the technology neutrality for each category of communication;
- address sensitivities and risks associated with technology neutrality; and
- prioritise reform implementation.

The consultation is seeking to identify principles in one or more forms of communications to guide legislative change, including identification and prioritisation of changes to provisions in the Treasury portfolio legislation and reduction or removal of exemptions in the Electronic Transactions Act

The Corporations Act and the SIS Act are considered relevant Treasury laws which may be within the scope of the reforms. The consultation materials include a case study related to binding death benefit nominations, the requirement to provide a physical signature and how a principals-based approach could see the SIS Act exemption to the *Electronic Transactions* Act allowing the use of alternative forms of identity verification and agreement.

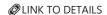
Responses may be submitted up until 28 February 2021.

Superannuation trustees should review the consultation paper and consider how trustee operations can be streamlined, reducing compliance costs.



Remediation Guidance

3 December 2020 Consultation



ASIC released a consultation paper on proposed updates to Regulatory Guide 256: Client review and remediation conducted by advice licensees. ASIC intends to clarify that its guide is relevant all AFS licensees and trustees of regulated superannuation funds.

This first round of consultation aims to:

- clarify and seek feedback on when a remediation should be initiated;
- understand if and when assumptions can be relied on in a remediation:
- understand barriers and opportunities in effectively returning money to affected consumers; and
- identify any gaps in the current RG 256 and deliver the guidance necessary to empower all licensees to remediate consumers efficiently, honestly and fairly.

Superannuation trustees should review the consultation paper and consider providing a response, particularly where the trustee has experienced challenges in remediating members.

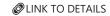






Insurance in Super

3 December 2020 Media release



ASIC released a media release referring to its review of default occupational categories in life insurance held through super and the identification of ways for superannuation trustees to improve member outcomes and better meet legal obligations.

ASIC reviewed the 'occupational default' practices of a sample of 21 trustees who were using a high-risk occupational category as the default in their MySuper products. In the products ASIC looked at, on average the price of default insurance for the highest risk occupational category was approximately double that of the lowest risk category. In five out of 20 cases, the price difference was between three and four times.

ASIC advised that superannuation trustees can enhance outcomes for member with default insurance by ensuring that:

- effort to gather better occupation data about individuals and cohorts so that default settings are based on appropriate statistical assumptions and are fair and reasonable;
- occupational default labels are meaningful, promote understanding of the level of risk and associated cost of the category, and trustees take prompt action to address any mis-categorisation; and
- disclosures clearly state: member's occupational category; the meaning of the category; cost of insurance in that category; whether the member may be eligible for an alternative category; and that members can easily amend their profile so that premiums are charged based on accurate information.

Superannuation trustees should review their insurance occupational categories and the data upon which they have based their insurance arrangements and in turn review opportunities for uplift.



Critical Infrastructure

December 2020 Bill introduced Parliamentary review



The <u>Security Legislation Amendment (Critical Infrastructure) Bill 2020</u> which seeks to amend and build on the existing regime created by the Security of Critical Infrastructure Act 2018 was introduced into Parliament and the Parliamentary Joint Committee on Intelligence and Security has commenced a review of the Bill.

The Bill seeks to give effect to an enhanced regulatory framework by introducing additional positive security obligations for critical infrastructure assets, enhanced cyber security obligations for those assets most important to the nation, and government assistance to relevant entities for critical infrastructure sector assets in response to significant cyber attacks that impact on Australia's critical infrastructure assets.

The Bill defines "critical superannuation asset" and provides that the rules may prescribe how that definition is met. The rules will be used to identify those superannuation assets that are critical, which m ay include prescribing those with assets over a certain monetary threshold as critical. Submissions to the Parliamentary Joint Committee on Intelligence and Security are requested by 12 February 2021.

Superannuation trustees should review the Bill and consider whether a submission to the Committee is necessary.







LIBOR Transition

November 2020 Guidance



ASIC published Information sheet INFO 252 Managing conduct risk during LIBOR transition setting out practical guidance on frameworks and practices that both buy-side and sell-side entities can adopt to manage conduct risk during LIBOR transition.

The following sections may be of interest to superannuation trustees: performance of products and services; risk management framework; and buy-side entities' responsibilities.

The publication of LIBOR is expected to cease after the end of 2021 and the financial services industry has made substantial structural changes to transition from LIBOR to alternative reference rates (ARRs). Despite the progress to date, ASIC advises that entities have significant tasks ahead, especially regarding conduct risk, to ensure they are adequately prepared for LIBOR transition.

Superannuation trustees should ensure they are aware of any potential impacts of the transition away from LIBOR to fund operations and investments, particularly around legacy contracts pertaining to infrastructure. A review of existing contracts and templates is recommended to ensure that the transition from LIBOR rates occurs smoothly.



ABOUT QMV LEGAL

QMV Legal is focused on providing pragmatic and expert legal advice which considers both the nuance of superannuation law and the commercial and operational objectives of superannuation trustees and providers.

Being closer to the business operations and technology of running a superannuation fund provides QMV Legal with a unique insight into the legal issues faced by superannuation funds.



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