

NOTICE OF FILING

Details of Filing

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File Title:	AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION v MERCER SUPERANNUATION (AUSTRALIA) LIMITED (ACN 004 717 533)
Registry:	VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA



Sia Lagos

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.



Concise Statement

No. of 2025

Federal Court of Australia
District Registry: Victoria
Division: General

AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION
Plaintiff

MERCER SUPERANNUATION (AUSTRALIA) LIMITED (ACN 004 717 533)
Defendant

A. IMPORTANT FACTS GIVING RISE TO THE CLAIM

Introduction

1. This proceeding concerns failures by the defendant (**MSAL**) to comply with the **Reportable Situations Regime**.¹ The regime is a cornerstone of Australia's financial services regulatory structure that allows ASIC to detect significant non-compliant behaviours early, and take action where appropriate.
2. MSAL is the trustee of the Mercer Super Trust (**MST**), which is the seventh largest superannuation fund in Australia by members, with approximately 950,000 members and approximately \$71 billion of assets under management.
3. During the period between 1 October 2021 and 30 September 2024 (**Relevant Period**), MSAL failed to have in place an adequate system to comply with its obligations under the Reportable Situations Regime to report protracted investigations to ASIC, in breach of sections 912A(1)(a) and (c) of the *Corporations Act 2001* (Cth) (**Act**).
4. As a result of MSAL's deficient system, MSAL failed to report eight investigations to ASIC in the time required by the Act or at all, in breach of sections 912DAA(1) and (7) of the Act. The eight investigations, reflected in Annexure B, are examples that are emblematic of MSAL's broader systemic failures.
5. Further, in one instance where MSAL did report a protracted investigation – and ultimately a breach of a core obligation – three of the reports submitted to ASIC were materially false or misleading, in breach of section 1308 of the Act.

The Defendant

6. MSAL holds an Australian Financial Services Licence (**AFSL**) numbered 235906 and a Registrable Superannuation Entity licence. MSAL's AFSL authorises it to, among other things, deal in financial products in respect of superannuation, and provide a superannuation trustee service to retail and wholesale clients.

The Reportable Situations Regime

7. Section 912DAA(1) of the Act requires MSAL to report "reportable situations" to ASIC. "Reportable situation" is defined in section 912D(1) of the Act as follows:

¹ Division 3, Subdivision B, Part 7.6 of the *Corporations Act 2001* (Cth).

- (a) the financial services licensee or a representative of the financial services licensee has breached a “core obligation” and the breach is significant;
 - (b) the financial services licensee or a representative of the financial services licensee is no longer able to comply with a core obligation and the breach, if it occurs, will be significant;
 - (c) the financial services licensee or a representative of the financial services licensee conducts an investigation into whether there is a reportable situation of the kind mentioned in paragraph (a) or (b) (**Investigation**) and the investigation continues for more than 30 days;
 - (d) an investigation described in the previous paragraph discloses that there is no reportable situation of the kind mentioned in paragraph (a) or (b).
8. Investigations as described in paragraphs (7)(c) and (d) above are **Reportable Investigations**. The definitions of “core obligation” and “significant” are contained in sections 912D(3) and (4) of the Act, respectively.

ASIC’s allegations

9. Since 1 October 2021, MSAL has been required to have systems in place to facilitate compliance with the Reportable Situations Regime, including the identification and tracking of Investigations and the reporting of Reportable Investigations.
10. ASIC alleges that, during the Relevant Period, MSAL:
- (a) failed to have in place an adequate system to facilitate compliance with the Reportable Situations Regime, and specifically a system for identification and tracking of Investigations and reporting Reportable Investigations, in breach of sections 912A(1)(a) and (c) of the Act; and
 - (b) failed to lodge a reportable situation report with ASIC in relation to the eight incidents summarised in **Annexure B** in the time required by the Act or at all, in breach of sections 912DAA(1) and (7) of the Act.
11. Further, ASIC alleges that MSAL filed reportable situation reports with ASIC that were materially false or misleading, in breach of sections 1308(4) and/or (5) of the Act.

MSAL outsources compliance and risk management functions

12. MSAL is a subsidiary of Mercer (Australia) Pty Ltd (**MAPL**). Pursuant to an agreement dated 9 March 2012 and in force during the Relevant Period, MAPL provided services and human resources (staff) to MSAL, including in respect of compliance and risk management, to ensure MSAL’s compliance with the Act, including the Reportable Situations Regime. Notwithstanding, MSAL remained responsible for ensuring compliance with the obligations of financial services licensees in Division 3 of Part 7.6 of the Act, including, relevantly, the obligation under section 912A(1)(a) of the Act and the obligation to report Reportable Investigations to ASIC under section 912DAA of the Act.

The Mercer Incident System

13. In the Relevant Period, MSAL’s system, which was administered by MAPL, in relation to “incidents” and Investigations relevantly included the following:
- (a) policy and procedure documents identified in Annexure A (**Documented System**);
 - (b) a Governance, Risk and Compliance database known as “Scout” (**GRC Database**); and
 - (c) manual processes described further at paragraph 17 below which were not recorded in the Documented System or integrated into the GRC Database (**the Manual Process**).

14. MSAL's compliance and risk function comprised "Line 1" and "Line 2" teams. Each incident, being "a circumstance or event caused by inadequate or failed internal processes, people, systems or external events" (**Incident**), was to be entered into the GRC Database as it was identified.
15. A function of the GRC Database, partly set out in the Documented System, was the assessment of Incidents, including as to their potential compliance impact and reportability, as follows:
 - (a) Incidents underwent an "initial assessment" whereby, among other things, they were assessed for a potential compliance impact (which included a potential breach of legislation) and given a rating. This was typically completed by Line 1.
 - (b) Once an Incident was assessed as having a potential compliance impact:
 - (i) it was required to undergo a regulatory "compliance assessment";
 - (ii) the compliance team received an automated notification by email that the incident required a risk and compliance assessment; and
 - (iii) if necessary, further information, such as member impact, was gathered and assessed for the purposes of conducting the compliance assessment.
 - (c) The compliance assessment was completed by Line 2 who determined, among other things, whether the Incident gave rise to a potentially reportable situation.
 - (d) Following the compliance assessment, Incidents which were potentially reportable were typically escalated to the Significant Incident Review Panel (**SIRP**) to determine if the incident should be reported to ASIC under the Reportable Situations Regime.
16. From August 2023, all Incidents were assessed during the initial assessment stage as having a potential compliance impact and directed to a compliance assessment.
17. The Manual Process involved, for certain periods of time, members of the Line 2 team discussing Incidents at weekly meetings and recording and tracking those Incidents manually on spreadsheets.
18. The matters in paragraphs 13 - 17 above are referred to as the **Mercer Incident System**.
19. By reason of the Mercer Incident System, an Investigation commenced at least from the time that the Incident was assessed as having a potential compliance impact, which then triggered the need for a compliance assessment and further information gathering as identified in paragraph 15(b)) above.

Deficiencies of the Mercer Incident System

20. During the Relevant Period, the Mercer Incident System was deficient for the following reasons:
 - (a) There was no end-to-end policy or procedure to adequately and consistently enable MSAL to:
 - (i) identify the commencement of an Investigation;
 - (ii) track the duration of an Investigation; and/or
 - (iii) identify whether and when to report an Investigation to ASIC in accordance with the Reportable Situations Regime.
 - (b) There was no, or no adequate, definition, direction, description, or working example in any document within the Documented System that would allow compliance staff to reasonably identify:
 - (i) whether an Investigation had commenced;
 - (ii) how the commencement date of an Investigation was to be determined; and/or
 - (iii) that a Reportable Investigation is in and of itself a reportable situation.

- (c) To the extent that any date for the commencement of an Investigation was identified, the dates:
 - (i) were inconsistently calculated; and
 - (ii) did not accurately reflect when an Investigation commenced for the purposes of the Act.

For example, at different points during the Relevant Period, an Investigation was variously taken to have commenced when: an incident was escalated to SIRP; Line 2 considered that “fact finding” was complete; or the compliance assessor had obtained sufficient information and had formed the view that there were reasonable grounds to believe a significant breach of a core obligation had occurred or was likely to occur, all of which could be many months after the Incident was identified, lodged in the GRC Database and assessed as having a potential compliance impact.

- (d) By reason of the matters in paragraph 20(c)) above, the fact that an Investigation had continued for more than 30 days was not necessarily considered or captured as part of a compliance assessment and such Investigations were, therefore, not necessarily escalated further as being potentially reportable.
- (e) There was no document that nominated those responsible for identifying whether an Investigation was on foot, its duration or whether it was reportable.
- (f) There was no, or no adequate, function within the GRC Database to identify the commencement date of the Investigation, track the duration of an Investigation, and/or trigger an alert to report, or consider reporting, an Investigation to ASIC.
- (g) Manual spreadsheets used in the periods 1 October 2021 to May 2023 and August 2024 to September 2024 to identify and track the duration of Investigations:
 - (i) were not subject to any documented guidelines to assist those who used and/or relied on the spreadsheets to determine the start date of an Investigation correctly or consistently;
 - (ii) relied on an incorrect Investigation commencement date;
 - (iii) did not make clear the source of the data/information to be considered;
 - (iv) did not include any automated trigger to notify the compliance team that an Investigation was approaching, or had exceeded, 30 days’ duration;
 - (v) were largely manual documents subject to human error;
 - (vi) were not subject to any, or any adequate, supervision or oversight; and
 - (vii) did not make clear those responsible for maintaining, verifying and validating data and decisions made by using the manual process.
- (h) During the period May 2023 to August 2024, there was no designated process at all to identify the commencement of an Investigation, track the duration of an Investigation, and/or report a Reportable Investigation.

(individually and collectively, the **Deficiencies**).

21. Having regard to the Deficiencies, a licensee in MSAL’s position ought to have had in place an effective, consistent and documented process by which:

- (a) There was a clear end-to-end process and/or process map, which set out: the approach to identify, conduct, track, and report Investigations; and the allocation of responsibility for each step in the process, including overall oversight.

- (b) There was a documented definition of what constituted an Investigation (including how to determine an Investigation start date, and how and when an Investigation needed to be considered for reportability), which was correct, accessible and capable of being understood by Line 1 and Line 2 risk and compliance staff responsible for overseeing Incidents and Investigations, and Line 2 staff responsible for conducting compliance assessments and reporting.
- (c) The duration of Investigations could be tracked in an automated way, with alerts sent to relevant compliance staff to monitor and report Investigations within time.
- (d) Manual components of the system, if any, used to track and report Investigations:
 - (i) were documented in MSAL's policy and procedure documents;
 - (ii) had a correct Investigation start date;
 - (iii) made clear the information required to be considered to adequately track and report Investigations;
 - (iv) made clear the source(s) of data and/or information considered as part of the manual process;
 - (v) made clear those responsible for maintaining, verifying and validating data and decisions made by using the manual process; and
 - (vi) made clear what decisions were made by reference to the manual system, and where those decisions would be recorded.

MSAL's knowledge of and failure to remedy the Deficiencies

22. MSAL was aware or ought to have been aware of the Deficiencies by reason of the following:

- (a) MSAL had obligations to be informed of and ensure compliance with the Reportable Situations Regime.
- (b) MSAL knew or ought to have known what systems they had in place in relation to compliance with the Reportable Situations Regime.
- (c) Deloitte, independent auditor for MAPL and its subsidiaries, advised MAPL of risks associated with the Mercer Incident System, and the existence of incidents that had been open or under investigation for more than 30 days on 23 March 2022; on or around 28 April 2023; and on or around 22 April 2024.
- (d) Further, Deloitte also advised the MSAL Audit and Risk Committee of the risks identified immediately above on 8 March 2023 and 13 March 2024.

23. During the Relevant Period, MSAL did not take any, or any adequate, steps to rectify the Deficiencies or ensure that MAPL rectified the Deficiencies.

MSAL's failure to report Reportable Investigations within time or at all

24. MSAL is required to lodge a report in relation to a reportable situation (as defined in sections 912D(1)(a) to (d) of the Act) within 30 days of the circumstances in section 912DAA(3). By reason of the Deficiencies, during the Relevant Period, MSAL:

- (a) failed to adequately identify Investigations that had continued for more than 30 days; and
- (b) failed to report Reportable Investigations to ASIC as required by section 912DAA(3).

25. By way of example, MSAL failed to report within time, or at all, Investigations in relation to the following Incidents lodged in the GRC Database: INC-0011906; INC-0013541; INC-0017604; INC0017236; INC-0016363; INC-0016689; INC-0017268 and INC-0019650.
26. Each of the above Incidents is summarised in **Annexure B**. For each Incident:
- (a) The Investigation commenced on the date in Column E, being the date that the incident was assessed as having a potential compliance impact, or in the case of INC-0013541, the date on which the Investigation was re-enlivened.²
 - (b) MSAL investigated whether there had been a reportable situation of the kind mentioned in sections 912D(1)(a) and/or (b) of the Act.
 - (c) The Investigation continued for more than 30 days.
 - (d) The date the Investigation should have been reported to ASIC is identified in Column G.
 - (e) The date compliance staff considered that the Investigation disclosed no reportable situation of the kind mentioned in sections 912D(1)(a) or (b) of the Act is identified in Column H.
 - (f) The date on which the outcome in 26(e) above ought to have been reported to ASIC is identified in Column I.
27. For each Incident, other than INC-0011906, no report was submitted to ASIC. Those Investigations continued for between 105 and 435 days.
28. In the period 1 October 2021 to 26 July 2024:
- (a) 2,018 Incidents related to MSAL were lodged in the GRC Database;
 - (b) of the 2,018 Incidents lodged, 1,214 were subject to a compliance assessment;
 - (c) in respect of 540 Incidents (of the 1,214 Incidents subject to a compliance assessment) there were more than 30 days between the date of the initial assessment and the date that the compliance assessment was completed (which by reason of the matter alleged at paragraph 19 above indicates that an Investigation was on foot for more than 30 days);
 - (d) in respect of 336 Incidents (of the 1,214 Incidents subject to a compliance assessment) there were more than 60 days between the date of the initial assessment and the date that the compliance assessment was completed (which by reason of the matter alleged at paragraph 19 above indicates that an Investigation was on foot for more than 60 days);
 - (e) MSAL only submitted 24 initial reports in relation to a reportable situation to ASIC. Of the 24 reports, 15 related to Reportable Investigations.

MSAL's false or misleading statements

29. INC-0011906 concerned the failure to create employer-sponsored accounts for members, at the request of employers, which could impact the allocation of superannuation contributions, fees charged, and default insurance. The incident impacted all plans of the MST.

² INC-0013541 was selected as having a potential compliance impact on 12 July 2023, almost one year after it was lodged in the GRC Database. Five days later, on 17 July 2023, the compliance assessment field within the GRC Database was updated to record that there was no regulatory impact, SIRP did not need to be notified, and the compliance assessment status was updated directly to 'completed'. However, on 11 December 2023, the compliance assessment status within the GRC Database was changed from 'completed' to 'investigation' and on 18 December 2023, MSAL's Senior Manager of Risk Management sought further information from an Incident Manager to inform a compliance assessment. In those circumstances, ASIC relies on 18 December 2023 as the Investigation start date for that Incident.

30. MSAL lodged five reports with ASIC in relation to a reportable situation for INC-0011906: on 21 April 2023 (**First Report**); 27 October 2023 (**Second Report**); 10 May 2024 (**Third Report**); 15 November 2024 (**Fourth Report**); and 30 April 2025 (**Fifth Report**).
31. MSAL's Senior Manager of Risk Management was responsible for, and did prepare and submit, each of the First, Second, Third and Fourth Reports.

The Second Report

32. The Second Report includes a statement to the effect that the number of clients affected by the reportable situation (if any) was "not known". In fact, and at the time of submitting the Second Report, MSAL knew that at least 231 members had been impacted and remediated by MSAL (**Known Impact**).
33. On 23 June 2023, MSAL's Senior Manager of Risk Management was informed by the Incident Manager for the Incident that there were 7,761 impacted members being investigated, of which 231 members had been remediated and issued an apology. From 12 May 2023, the GRC Database included reference to the 231 impacted members.

The Third Report

34. The Third Report includes statements to the effect that: (a) there were four instances of the event relating to the reportable situation; and (b) the reportable situation affects or would likely affect an estimate of 50 clients.
35. In fact, at the time of submitting the Third Report, MSAL was aware of the Known Impact and the matters alleged in paragraph 33 above.

The Fourth Report

36. The Fourth Report includes statements to the effect that: (a) the reportable situation affected or would likely affect 450 clients; and (b) there were seven instances of the event relating to the reportable situation. In fact, at the time of submitting the Fourth Report, MSAL was aware that around 5,831 members were likely impacted by the Incident. Even if MSAL believed that the number of impacted members was 450 (which is not accepted), it could not have reasonably considered that there were seven instances of the event relating to the reportable situation.
37. On 1 November 2024, the GRC Database entry for the incident was updated to specifically record the number of impacted members. The update was to the effect that 12,357 member registration requests (**MRRs**) had been reviewed in respect of the incident with 5,831 MRRs impacted where a participating employer had lodged the request.
38. The incident description field, which was a free text field, in the Second and Third Reports did not include the matters alleged in paragraphs 32 and 33 above. The incident description field in the Fourth Report also did not include the matters alleged in paragraphs 36 and 37 above.

The Second, Third and Fourth Reports were materially false or misleading

39. By reason of the matters in paragraphs 32, 33, 35, 36, and 37 above, the statements made as identified in paragraphs 32, 34, and 36 were materially false and/or misleading.
40. Having regard to paragraph 31 above, knowledge of each of the matters referred to in paragraphs 33, 35, and 37 above is attributable to MSAL under section 769B(3) of the Act. While ASIC does not allege that MSAL set out to deliberately mislead ASIC, by reason of the matters in the previous sentence, MSAL knew that each of the Second, Third and Fourth Reports were materially false or misleading.

41. Alternatively, MSAL failed to consider, or properly consider, relevant documents including the GRC Database entry for INC-0011906 prior to lodging the Second, Third, and Fourth Reports, and that conduct was reckless or constituted a failure to take all reasonable steps to ensure that the reports were not materially false or misleading.

B. SUMMARY OF RELIEF SOUGHT FROM THE COURT

42. ASIC seeks the relief set out in the accompanying Originating Process, including declaratory relief under section 21 of the *Federal Court of Australia Act 1976* (Cth) and/or section 1317E of the Act, pecuniary penalty orders under section 1317G of the Act, and costs.

C. PRIMARY LEGAL GROUNDS FOR THE RELIEF SOUGHT

43. By reason of the Deficiencies and the matters alleged in paragraphs 9 and 21 - 26 above, MSAL did not comply with the financial services laws (being the Reportable Situations Regime) in contravention of section 912A(1)(c) of the Act.
44. By reason of the Deficiencies and the matters alleged in paragraphs 9 and 21 -26, and 43 above, MSAL did not do all things necessary to ensure that the financial services covered by its AFSL were provided efficiently, honestly and fairly, in contravention of sections 912A(1)(a) and 912A(5A) of the Act.
45. By reason of the matters alleged in paragraphs 24 - 26 above, MSAL contravened sections 912DAA(1) and (7) of the Act in respect of the Incidents described in paragraph 25.
46. By knowingly or recklessly lodging the Second, Third and Fourth Reports with ASIC in circumstances where each report was materially false or misleading because of statements made in those documents, MSAL contravened section 1308(4) of the Act.
47. Further or alternatively to paragraph 46 above, by failing to take all reasonable steps to ensure that the Second, Third and Fourth Reports were not materially false or misleading because of statements made in those documents, MSAL contravened section 1308(5) of the Act.

D. ALLEGED HARM SUFFERED

48. A purpose of the Reportable Situations Regime is to enhance accountability, transparency and oversight by, and of, AFSL licensees. The obligation to report Reportable Investigations specifically ensures that ASIC has visibility of protracted investigations and incentivises licensees to prioritise and streamline investigation processes.
49. By failing to have in place an adequate system to comply with the Reportable Situations Regime, MSAL which holds retirement funds for more than 950,000 members:
- (a) did not have in place the governance structures and processes expected of a licensee of MSAL's size and market position;
 - (b) was not in a position to be transparent and accountable in their engagement with ASIC and undermined ASIC's ability to exercise sufficient oversight; and
 - (c) was not incentivised to prioritise and streamline Investigations, including the rectification of systemic issues that posed a risk to members,
- which is ultimately to the detriment of those members.
50. The potential for member detriment was brought to bear in MSAL's failure to report the Reportable Investigations in Annexure B. That failure prevented ASIC from having oversight of those Reportable Investigations, including the timely rectification of systemic issues to prevent ongoing member impacts and the timely remediation of members.

51. Similarly, MSAL's false or misleading reports in respect INC-0011906 prevented ASIC from understanding the full scope and impact of that incident and keeping MSAL accountable for its timely, full and proper resolution.

Date: 14 August 2025

Certificate of lawyer

I, Alana Giles, certify to the Court that, in relation to the Concise Statement filed on behalf of the Plaintiff, the factual and legal material available to me at present provides a proper basis for each allegation in the Concise Statement.

Date: 14 August 2025

A handwritten signature in blue ink, appearing to read 'Alana Giles', is positioned above a horizontal dotted line.

Signed by Alana Giles, Holding Redlich
Solicitor for the Plaintiff

This concise statement was prepared by F K Forsyth and R M Burd, Counsel for the Plaintiff.

Annexure A – MSAL’s policy and procedure documents comprising the Documented System

1. Incident Management Policy (Versions 7.0, 7.1, 8.0, 9.0)
2. Management of reportable situation process flow (Version 0.1)
3. Management of potential reportable situations guide (Versions 1.0, 2.0, 3.0)
4. Australia Breach Reporting: Initial Triaging Checklist (Versions 1.0, 2.0, 3.0, 3.12, 4.0)
5. Line 1 Incident Fact Finding Checklist (Versions 1.0, 2.0)
6. Scout Incident Management Guidelines (Versions 1.0, 2.0, 2.1)
7. Mercer Super Line 1 Risk and Compliance: Incident Entry Template
8. Mercer Super Line 1 Risk and Compliance Existing Incident Uplift Requirements
9. Mercer Super Line 1 Risk and Compliance: Incident Entry, Validation Process & Incident Support

Annexure B – Summary of Incidents

A. Incident number and title	B. Date occurred	C. Date identified	D. Date lodged in Scout	E. Investigation start date	F. Day 31	G. Date s 912D(1)(c) report should have been submitted	H. Date MSAL considers no reportable situation under ss 912D(1)(a) or (b) has arisen (date compliance assessment completed)	I. Date s 912D(1)(d) report should have been submitted	J. Number of days of Investigation
INC-0011906 <i>MST #11906 - New accounts with default insurance have not been created for existing retained members of the fund</i>	20/12/2021	01/02/2022	07/02/2022	07/02/2022	10/03/2022	11/04/2022 ³	N/A	N/A	N/A
INC-0013541 <i>Mercer Super INC #13541 - The updates submitted by the employer through SuperStream(SS) are not being processed</i>	08/08/2022	08/08/2022	09/08/2022	18/12/2023	18/01/2024	19/02/2024 ⁴	1/08/2024	02/09/2024 ⁵	227
INC-0017604 <i>MST (MT285) #17604 - Multiple issues impacting [employer] fund</i>	01/11/2022	11/10/2023	12/10/2023	12/10/2023	12/11/2023	12/12/2023	09/11/2024	09/12/2024	394
INC-0017236 <i>[Employer] Super #17236 - Incorrect investment fee disclosed in Product Guide document</i>	30/06/2022	13/04/2023	31/08/2023	31/08/2023	1/10/2023	31/10/2023	08/11/2024	09/12/2024 ⁶	435
INC-0016363 <i>Mercer Super #16363 - Unallocated monies greater than 28 days</i>	01/05/2023	07/06/2023	13/06/2023	14/06/2023	15/07/2023	14/08/2023	23/05/2024	24/06/2024 ⁷	344
INC-0016689 <i>Mercer Super (ST200) #16689 - Communication not issued to the members when moving from active</i>	01/04/2023	11/07/2023	11/07/2023	12/07/2023	12/08/2023	11/09/2023	11/04/2024	13/05/2024 ⁸	274

³ The expiration of the 30 day period was 9 April 2022, a Saturday. Monday, 11 April 2022 was the next business day.

⁴ The expiration of the 30 day period was 17 February 2024, a Saturday. Monday, 19 February 2024 was the next business day.

⁵ The expiration of the 30 day period was 31 August 2024, a Saturday. Monday, 2 September 2024 was the next business day.

⁶ The expiration of the 30 day period was 8 December 2024, a Sunday. Monday, 9 December 2024 was the next business day.

⁷ The expiration of the 30 day period was 22 June 2024, a Saturday. Monday, 24 June 2024 was the next business day.

⁸ The expiration of the 30 day period was 11 May 2024, a Saturday. Monday 13 May 2024 was the next business day.

A. Incident number and title	B. Date occurred	C. Date identified	D. Date lodged in Scout	E. Investigation start date	F. Day 31	G. Date s 912D(1)(c) report should have been submitted	H. Date MSAL considers no reportable situation under ss 912D(1)(a) or (b) has arisen (date compliance assessment completed)	I. Date s 912D(1)(d) report should have been submitted	J. Number of days of Investigation
<i>employment to the retained section – [Employer] Group Plan</i>									
INC-0017268 <i>Multi Fund #17268 - Members insurance premiums refunds not processed correctly after date of death</i>	22/04/2014	05/09/2023	05/09/2023	05/09/2023	6/10/2023	6/11/2023 ⁹	29/05/2024	28/06/2024	267
INC-0019650 <i>Mercer Super (MT355) #19650 - Insurance has not been loaded correctly after 01/12/2023 changes for Cat 4</i>	14/12/2023	14/06/2024	14/06/2024	17/06/2024	18/07/2024	19/08/2024 ¹⁰	30/09/2024	30/10/2024	105

⁹ The expiration of the 30 day period was 5 November 2023, a Sunday. Monday, 6 November 2023 was the next business day.

¹⁰ The expiration of the 30 day period was 17 August 2024, a Saturday. Monday, 19 August 2024 was the next business day.