



ASIC
Australian Securities &
Investments Commission



Financial Services Industry Workshop

Summary document

Thursday 30 November 2023



*Understanding and responding to identification
challenges for First Nations consumers*

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Background

The Australian Securities and Investments Commission (ASIC) published the [Indigenous Financial Services Framework](#) in February 2023. The Framework outlines Key Learnings relating to First Nations peoples' access to and engagement with the financial system. The Key Learnings were developed through extensive consultations with a range of stakeholders, including First Nations community representatives.

We continue to work towards the long-term outcomes identified in the Framework, through our own work and through collaboration with other stakeholders. This includes ongoing engagement through dedicated streams, namely:

- **ASIC's Indigenous Advisory Group**, which ensures that First Nations consumers' needs, experiences and perspectives continue to inform our work and that ASIC is aware of emerging and systemic challenges experienced by First Nations consumers when engaging with the financial system
- **Cross-Government Engagement Group**, which includes a range of federal government agencies whose priorities, functions and responsibilities align with the Framework outcomes, and the objectives of which include identifying opportunities to collaborate, share information and learnings, and leverage each other's activities where objectives align
- the **financial services industry**, including industry associations, to discuss priorities and activities of First Nations consumers and hold ASIC-facilitated workshops for industry representatives on key themes that are important to First Nations consumers.

We are grateful to the industry associations that assisted in promoting this workshop with their members. The organisations that attended this workshop are listed in **Appendix 2**.

Staying in touch

If you would like to contact ASIC's Indigenous Outreach Program, please email us at Indigenous.fs.framework@asic.gov.au. We look forward to keeping you up to date as we continue this important work.

Summary of workshop presentations

ASIC opening remarks

Alan Kirkland, Commissioner, ASIC

Mr Kirkland highlighted the Key Learnings in ASIC's Framework. The Key Learnings outline the history and circumstances of engagement by First Nations peoples with the financial services system and how and why it differs from other cohorts of consumers. Further, he noted that the Framework outlines why all organisations operating within and adjacent to the financial system must ensure these unique experiences are considered, and tailored approaches are developed to ensure successful and positive engagement by First Nations peoples across the financial services industry. Mr Kirkland emphasised this work involves consultation and collaboration across a range of stakeholders, including but not limited to financial services industry participants.

Mr Kirkland outlined the workshop's focus on identification challenges for First Nations consumers, which are long-standing. He noted that some progress has been made over the years, including through guidance issued by the Australian Transaction Reports and Analysis Centre (AUSTRAC). However, identification challenges persist for First Nations consumers and those challenges are evolving as the financial services industry moves to digital channels.

Mr Kirkland emphasised that failure by financial services to understand the challenges with identification and implement effective alternative approaches, which are embedded across all service channels, can have significant impacts on individuals, their families and communities. Those impacts can transcend financial harm and negatively affect overall wellbeing.

Panel: Consumer advocate case studies deep dive


Fiona Pettiford, Manager of Money Support Hub East Arnhem, Anglicare NT

Mark Holden, Senior Solicitor and Policy Advocate, Mob Strong Debt Help

Marcel Sithole, Coordinator of Fitzroy Financial Counselling Services, Marra Worra Worra Aboriginal Corporation

Mr Holden commenced the discussion by providing context for why conventional identification documents and verification processes present challenges for First Nations peoples:

- **Structural barriers** due to past policies and practices have prevented the registration of First Nations peoples' births and led to inaccuracies or inconsistencies with identification documents.
- **Circumstantial impacts** such as emergencies can make it difficult to obtain identification documents (e.g. when affected by a natural disaster or fleeing a family or domestic violence situation).
- **Cultural reasons** including having oral-based cultures and languages can mean that written details such as family surnames vary in spelling and pronunciation. Cultural obligations also require individuals to be known by different names after certain life and cultural events.
- **Digital channels** for accessing identification documents and engaging with financial services are increasing, while face-to-face services are reducing. This creates additional challenges for individuals experiencing digital exclusion, both in accessing required identification documents and engaging with financial services effectively.
- **Security and verification processes** have had to evolve and adapt quickly due to increasingly complex scams and unauthorised transactions. These changes have compounded existing challenges and impacts mentioned above.



Advocates presented a selection of case studies detailing individual customer experiences with identification processes as they interact with a range of financial service providers. The full details of each case study can be found in **Appendix 1**.

These case studies were presented to build an understanding of challenges faced by First Nations consumers. They show inconsistencies in bank procedures and lack of flexibility and culturally appropriate responses. While each incident was ultimately resolved, it generally took significant advocacy and unacceptable timeframes to reach an outcome. The financial services industry as a whole can use these case studies as learning opportunities for their processes going forward.

AUSTRAC presentation: Assisting customers without standard forms of identification

William Morris, Director of Regulatory Guidance, AUSTRAC

Mr Morris spoke to the legislative purpose of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act) and [AUSTRAC guidance](#) on identifying individuals who do not have access to conventional forms of identification.

The purpose of the AML/CTF Act is to ensure that regulated businesses adopt measures to detect, deter and disrupt money laundering, terrorist financing and other crimes. The AML/CTF Act partially achieves this by ensuring that regulated businesses do not provide designated services to individuals until the business is satisfied that the individual is who they claim to be.

Mr Morris explained the importance of meeting that purpose without financially excluding vulnerable individuals from banking services. Financial exclusion can create separate economies, such as cash economies, which can be vulnerable to unscrupulous practices and targeted by the kinds of criminal operations the legislation is seeking to address.

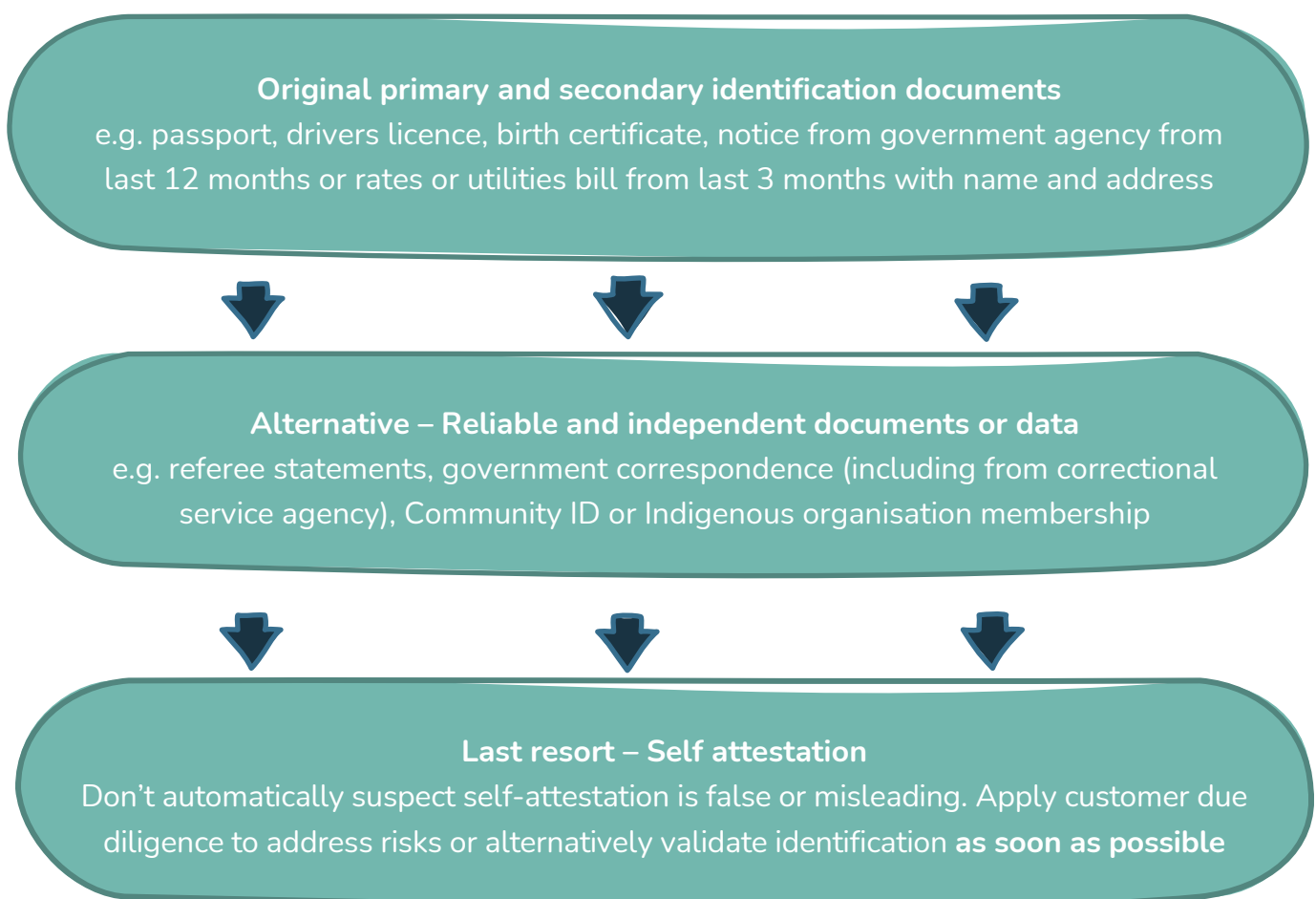
Mr Morris reflected that the case studies shared during the panel stem from a misapplication or misunderstanding of legislative requirements and AUSTRAC's guidance. Most of the case studies involved low risk of money laundering and terrorist financing. A flexible approach to identity verification could have been adopted for vulnerable and highly remote individuals seeking to access low-risk services (such as opening a bank account and depositing small sums of money).

Mr Morris spoke about the recent update to AUSTRAC's guidance. This was undertaken in consultation with the financial services industry and advocacy groups, such as those working with prison populations and people experiencing family violence. He said the consultation process revealed that many regulated entities did not understand the flexibility the AUSTRAC guidance provides.

Mr Morris outlined the identification verification process for an individual customer under the AML/CTF Act. He outlined that identification documentation can be provided electronically rather than in person and, where a customer is unable to obtain standard information or evidence of identity, they could prove their identity through the alternative means outlined in Figure 1 in accordance with the bank's risk-based systems and controls.

He advised that organisations with a culture of listening and hearing customers' experiences typically followed best practice and innovative approaches. He also reflected on the importance of organisations embedding flexible identification approaches in their training to achieve good outcomes.

Figure 1: Alternative means of identification



ABA presentation: Community ID cards project

Ali Beiglari, Director of Policy, Australian Banking Association (ABA)

Mr Beiglari spoke to the role of the ABA and the challenges of identification for First Nations consumers, particularly those in regional and remote locations. In addition to these long-standing identification issues, he reflected on increasingly frequent and impactful events, such as the floods in the Kimberley region (WA) around Christmas 2022, when access to money and identification documents was challenging for residents in that region.

Mr Beiglari spoke about the Community ID Cards project. The genesis of the ABA's current project on Community ID cards stemmed from the ABA's participation in the Broome Banking Roundtables. These were events led by Veronica Johnston (Senior Financial Counsellor, Broome CIRCLE) and a customer outcomes group comprising customer representatives including Lynda Edwards (Financial Capability Coordinator, Financial Counselling Australia).

The aim of the project is to understand how Community ID cards function and on what basis ABA member banks can accept them as a form of customer identification. The project deliverable is a factsheet for ABA member banks to use as part of their 'Know Your Customer' requirements. While banks' processes vary, all banks can accept and rely on Community ID cards to identify their customers.

The project has since expanded to provide guidance to communities interested in issuing their own Community ID cards and suggest features required for banks to accept those cards, including:

- customer information such as name, address, date of birth and photograph
- optional features such as:
 - the individual's handwritten signature
 - the issuer's reference number.

Mr Beiglari spoke to some examples of other situations where Community ID cards are accepted as identification, such as on transportation. He also noted that Community ID cards won't be a solution for all communities and broader change is required by state and territory agencies.

Presentation: Indigenous Business Australia's approach to verifying identification

Daniel Blanket, Policy Advisor – Strategy and Impact, Indigenous Business Australia

Nyree Gertz, Home Ownership Program, Indigenous Business Australia

Mr Blanket commenced by outlining the role of [Indigenous Business Australia](#) (IBA). IBA is a Commonwealth agency established to focus on economic empowerment and self-determination of First Nations peoples in the areas of home ownership, business and investment. The agency also works on capability development with their customers, building their ability to engage with those specific focus areas.

Mr Blanket outlined that, as First Nations customers are the sole focus of the organisation, First Nations customer experience can be front of mind in all service areas. This means the agency focuses on ensuring IBA's policies and procedures are fit for purpose for this distinct cohort of customers and appropriate for strong and positive customer engagement outcomes.

Mr Blanket spoke to IBA's four goals within its five-year corporate strategy, being:

- choice
- inclusion
- prosperity
- excellence.

Mr Blanket reflected on two of these principles:

- **Inclusion** – This principle is focused on First Nations customers' experience of inclusion in the financial system and ensuring that IBA is complying with all relevant obligations, without limiting financial inclusion or creating barriers through that process.

- **Excellence** – IBA is aware of its limitations. It recognises the need to be strategic to be impactful. Therefore, IBA works in partnership with other agencies and organisations to deliver on its strategic goals that generate impact for its First Nations customers.

Ms Gertz then spoke specifically to IBA's Home Ownership Program, which has been operating since 1975. The program has assisted over 20,000 First Nations families who didn't qualify for mainstream consumer credit to buy their first home. IBA does not compete with the banks in this space. Rather it fills a gap and helps more First Nations peoples to home ownership, which is aligned with the organisation's purpose.

In addition to the standard individual identification verification process, because of its specific First Nations mandate, IBA also requires at least one applicant per application to verify their identity as a First Nations individual. IBA applies flexible guidance to this requirement by accepting a statutory declaration. It previously required a statement of proof from a local Aboriginal land council or the Office of the Registrar of Indigenous Corporations. IBA engages with customers early in their home ownership journey (i.e. before a formal application for a home loan). This allows time and support to teach customers about the process and obtain all the relevant documents ahead of time.

Ms Gertz emphasised that, due to IBA's specific purpose and focus on First Nations consumers, it has detailed cultural capability training for all staff to ensure they engage with First Nations customers in a meaningful way. The training is not seen as a 'tick and flick', but is considered an integral part of building IBA's staff capability as part of the agency's ongoing journey.

Mr Blanket said it is important that policy acknowledges input from front line staff as they are the first point of contact with customers. IBA's significant First Nations employee network also advises and provides input into policies and procedures. The network's customer-facing staff combine knowledge and technical expertise, as well as lived experience, to assist customers with challenges meeting identification requirements.

Appendix 1: Consumer advocate case studies

Note: Case studies are provided by [Anglicare NT](#) and [Marra Worra Worra Aboriginal Corporation](#). All customer names used in the case studies have been changed.

Case study 1: Culturally appropriate responses needed for identification on Indigenous phone lines

Andrew lives in the remote community of Galiwin'ku. Anglicare NT visits Galiwin'ku once a month. Andrew had an inactive bank account, which he wanted to re-activate to use as a savings account to save some money from his wages.

Identification verification issues

Andrew spoke with Anglicare NT on 24 August 2023 and saw a financial capability worker (FCW). He had a query about his inactive account at a certain bank. He wanted to use the inactive account to save part of his wages and keep the remainder of his wages in his account at another bank.

Andrew and the FCW called the Indigenous help line for the inactive account's bank on the FCW's mobile phone. The FCW introduced himself and explained he had a customer with him who wished to find out about his account. He also explained that he was calling from a remote community, English was not the customer's first language, the customer needed the FCW to assist with communication on the call and the phone was on speaker to assist with this.

The bank consultant on the help line told the FCW he could not be present while Andrew verified his identity. When the FCW explained this would make things difficult for Andrew, the consultant forcefully repeated the FCW could not be with Andrew and told Andrew to go to a private area to continue the conversation. The FCW advised Andrew he would step away and gestured that he was still close by if needed. As Andrew continued the call with the consultant, the FCW could see that Andrew was confused and was not understanding what the consultant was saying.

The FCW tried explaining to the consultant two or three times that Andrew was struggling to comprehend what he needed to provide to verify his identity, but the consultant again refused to have the FCW assist with the call. Eventually, the consultant told Andrew he would have to go to a bank branch.

The FCW interjected again to explain that the requirement was impossible for Andrew, as he lives at Galiwin'ku on Elcho Island in north-east Arnhem Land and the bank's nearest branch is in Darwin. The consultant then advised Andrew that he could email a form to verify his identity and insisted on emailing it to Andrew, not the FCW. The customer's email was not a valid account so he did not receive the form. The consultant sounded angry on the phone and Andrew was very stressed by the call. The FCW apologised to Andrew for being unable to assist him with his query.

After these events, the FCW escalated the customer experience through Anglicare NT's internal channels. The program manager and FCW then met with bank representatives to discuss Andrew's case. They raised the issues with the bank's Indigenous help line and lack of cultural competency in assisting First Nations customers.

Outcome

It took multiple calls and emails over three weeks between the FCW, the bank and Andrew to resolve Andrew's issue with his bank account. Andrew is now able to use the account as he intended. The bank has engaged with Anglicare NT's service team to learn from the issues. We understand they are making changes, including restructuring their Indigenous help line.

Case study 2: Inconsistent procedures and information provided for required cultural name change

Isaac, a resident of Yakanarra Community (located 135 kilometres outside Fitzroy Crossing, WA), sought assistance from the Fitzroy Financial Counselling Service provided by Marra Worra Worra on 20 March 2023. He needed support to change his name details with his bank (based interstate) due to a shift in circumstances aligned with cultural practices.

Identification verification issues

During the initial financial counselling session, Isaac recounted his previous attempt to contact the bank. The bank instructed him to complete change of particulars paperwork and mail it to the bank, along with certified copies of his identification. Uncertain about the requirements, Isaac requested assistance in clarifying the process.

Marcel (the financial counsellor) helped Isaac contact the bank over the phone. They confirmed the need for original identification to be presented at a branch or paperwork to be mailed with certified copies. Considering the logistical challenges of traveling to an interstate bank, Isaac opted to mail the paperwork. Marcel guided Isaac through the paperwork and emphasized the need for certified copies of the identification. Isaac planned to obtain these from the Fitzroy Crossing police station.

On 23 March, Isaac returned to the Fitzroy Financial Counselling Service with certified copies of his identification and paperwork to be mailed to the bank.

Isaac faced his first hurdle on 29 March when he sought assistance to confirm whether the documents had reached the bank. Marcel helped Isaac call the bank, which reported it had not received the documents. At a follow-up session on 6 April, Isaac learned that the bank had received the paperwork, but additional certified identification documents were required. With the bank's guidance, Isaac and Marcel opted to email the missing documents. Isaac visited the police station again to secure the necessary certifications.

On 7 April, Isaac returned to the Fitzroy Financial Counselling Service with the required documents, and Marcel facilitated the email submission. An email response from Emma – the bank representative – confirmed receipt of the documents. She also assured Isaac in the email that the name change process would be completed within five business days.

The process encountered another twist on 14 April. Despite Emma’s earlier confirmation, a bank representative named Dallas insisted that the documents had not been received by email. Dallas also added that bank procedure was to only accept documents by mail and that email was not an option. Marcel, in consultation with Isaac, decided to comply with the bank’s contradictory request to mail the documents. Isaac and Marcel mailed the documents to the bank.

On 20 and 27 April, and 2 May, Isaac and Marcel contacted the bank to ascertain the status of the mailed documents.

Outcome

The bank confirmed over the phone on 2 May that it had received the documents, and the name change process had been set in motion. Emma, in an email response, assured Isaac that a new card with updated details had been dispatched.

Isaac expressed satisfaction with the outcome on 2 May. He emphasized that, without Marcel’s guidance, he would have been in the dark about the necessary steps to update his details, especially considering the delay of over a month in processing his request.

Despite the setbacks and inconsistencies in the bank’s procedures, the collaborative efforts of Isaac and Marcel ultimately prevailed, highlighting the importance of persistence and adaptability in navigating bureaucratic processes.

Case study 3: Inconsistent instructions for identification verification when seeking to access superannuation

Helen lives in the remote community of Galiwin'ku. Anglicare NT visits Galiwin'ku once a month. Helen turned 62 years old (preservation age) and wished to withdraw some of her superannuation (\$50,000), primarily to pay for her grandson's funeral.

Identification verification issues

Helen requested assistance from Anglicare NT on 27 April 2023. The financial counsellor advised her of what identification was required by the super fund and that it would need to be certified. Helen took the next few weeks to organise these documents.

On 22 May, Helen provided her certified identification and a bank statement to the counsellor, who assisted Helen to upload these to the super fund's website. The certified identification consisted of Helen's birth certificate, Northern Territory evidence of age card (photo ID) and Medicare card. The bank statement was not certified as the police won't certify bank statements. Helen and the financial counsellor received an automated message from the super fund advising they would be contacted if anything further was needed.

On 13 June, Helen contacted the super fund as she had not received her money. Helen provided the reference numbers she received after lodging her documents. The super fund advised Helen she had not supplied enough identification, and that she needed to provide a certified copy of her pension card (health care card) and a certified letter from Centrelink. The police certified the copy of the pension card as they could sight the original. However, they would not certify the Centrelink letter. The financial counsellor uploaded the certified pension card to the super fund's website.

On 29 June, the financial counsellor called the super fund with Helen and discovered the super fund had not looked at all the attachments originally uploaded in May.

Helen had provided satisfactory identification along with the withdrawal application. The super fund then said the bank statement wasn't certified but that Helen just needed to submit the fund's Aboriginal and Torres Strait Islanders form to address the issue. Helen found this call very stressful and she told the super fund she needed the money quite urgently for her grandson's funeral. The super fund advised that once Helen provided the form, they would rush her withdrawal through. The financial counsellor lodged the form on 30 June.

On 18 July, the financial counsellor called the super fund to check her authority on Helen's account and to check on progress with Helen's withdrawal. Neither the authority nor the form had been processed by the super fund. The super fund advised the financial counsellor to call with Helen when she was next at Galiwin'ku and to ask for the specialist First Nations team to assist with the bank statement issue which was holding up the withdrawal.

On 26 July, the financial counsellor called the super fund again with Helen. The service representative advised that he could see all the notes and records of contact by both Helen and the financial counsellor. He tried to locate a case manager to assist, but none were available. The financial counsellor advised the service representative that the police at Galiwin'ku will not certify bank statements or Centrelink income statements as they are copies printed off computers and no-one gets bank statements in the mail anymore. The financial counsellor said she had explained this multiple times to the super fund. The service representative advised he would get a case manager to call Helen back.

Outcome

On 3 August 2023, Helen called the financial counsellor and advised she had not received a call back from the super fund but had contacted them herself. She also advised that she had finally received her money. The process took more than 2 months for Helen to simply withdraw from her own superannuation.

Helen and the financial counsellor were reluctant to lodge a complaint with the super fund during the process as they were concerned this would slow the withdrawal down and Helen needed the money quite urgently. The financial

counsellor intended to lodge a complaint with the Australian Financial Complaints Authority (AFCA) once Helen received her money. However, Helen expressed her fear that if she made a complaint, the super fund would not let her withdraw from her super in the future. The financial counsellor respected Helen's wishes.

Financial counsellor's feedback:

'This is extremely poor service to a First Nations lady who wants only to access funds that she is entitled to and for the reason of paying for her grandson's funeral.

'Now that the customer has received her funds, I will be placing a complaint with AFCA due to the length of time this took and that we did everything that the super company requested and kept coming up against roadblocks that were unnecessary.

'Thank goodness my customer had the skills and confidence to ring them herself several times over the last few months to push this withdrawal forward, however slowly and with disregard for my customer.

'This is not an inclusive way to communicate with members and action requests in a progressive respectful manner; any member of a super fund should be listened to regardless of their heritage or background. Some super funds have no concept of remote life and the challenges faced by many people in accessing funds that are rightfully theirs. Super funds need to be aware of the AUSTRAC guidelines and to implement them when dealing with members that these guidelines apply to.

'My feelings around this interaction with the super fund was one of not being believed, like I was trying to scam my customer. Some days it was like having to do battle with a company that never had any intention of releasing funds.

'The judgemental way my customer was treated shows the power imbalance between those that can speak up for themselves and be listened to and those that struggle with getting anyone to listen, due to cultural, language, ID, educational or geographical differences.

'Applying for a super payment which the customer is entitled to receive, **should not be this hard.**'

Case study 4: Inconsistencies, certification issues and overall delays raised in document reviews

Selina, a resident of the remote Wangkatjungka Community (located 120 kilometres outside Fitzroy Crossing, WA) sought assistance from the Fitzroy Financial Counselling Service provided by Marra Worra Worra on 24 August 2023, with an application for the early release of her superannuation due to financial hardship.

Identification verification issues

Marcel (the financial counsellor) initiated the application during the initial financial counselling session with Selina by exploring various options to address her financial circumstances. Marcel assisted Selina in contacting her super fund, outlining the due process for a hardship application and the required supporting documents. Selina expressed her intention to compile the necessary documents and sought Marcel's assistance in mailing them to the super fund.

On 25 August, Selina returned to the Fitzroy Financial Counselling Service with the required documents, which were promptly mailed to the super fund.

Selina faced her first setback on 4 September when she followed up on the progress of her hardship application. Despite the timely mailing of documents, the super fund reported that they had not received Selina's documents and application.

Selina returned to the Fitzroy Financial Counselling Service on 7 September, seeking further assistance in resolving the issue. Marcel facilitated a call to the super fund, which confirmed that the customer's documents had been received. However, a new challenge emerged: the documents could not be assessed because Selina's bank statements needed certification. The super fund representative advised that the certified bank statements must be mailed to proceed with the application. Marcel assisted Selina in printing the necessary bank statements to be certified.

On 8 September, Selina returned to the Fitzroy Financial Counselling Service with the certified bank statements, which were promptly emailed to the super fund.

Selina followed up her hardship application again on 14 and 21 September. Marcel aided her in making calls to the super fund, confirming that, as of 21 September 2023, the super fund had received Selina's documents in the mail.

However, there was another challenge when the date of birth on Selina's file did not match the date of birth on one of the forms of identification provided. The super fund sent new forms to the Fitzroy Financial Counselling Service for Selina to complete, initiating a change of details request before the hardship application could be processed. The representative advised that Selina needed to attach certified copies of her identification, similar to the initial request. Marcel assisted Selina in completing and mailing the required documents.

On 6 October, Selina followed up her application again. Marcel helped her call the super fund, which revealed that it had received the documents in the mail, but the certified copies of identification did not include the full name of the certifier. The representative advised that Selina needed to attach certified copies of her identification again, along with the certifier's full name.

On 9 October, Selina returned to the Fitzroy Financial Counselling Service with the documents requested by the super fund. She sought Marcel's assistance in mailing them to the super fund. Frustrated by the lengthy and costly process, Selina spoke with the super fund and confirmed the required documents for the pending request before mailing them to the super fund.

Outcome

On 20 October, Selina returned to the Fitzroy Financial Counselling Service to follow up with the super fund again. Marcel assisted her in calling the super fund, and this time, the news was positive. The super fund had received Selina's documents, and the representative informed her that the assessment process for her hardship request would be commenced. Selina was assured that she would be updated on the progress by phone and email.

The superannuation hardship application process was successfully closed on 30 October 2023, after Selina received a confirmation email for early release of money from her super fund.

Appendix 2: Organisations in attendance

ABA	AFCA	AMP Limited
Angle Auto Finance	AUSTRAC	Australia and New Zealand Banking Group Limited
Australian Finance Industry Association	Australian Financial Security Authority	Australian Payments Plus
Australian Retirement Trust	AustralianSuper	Aware Super
Bank Australia	Bank of Queensland	Block, Inc
Commonwealth Bank of Australia	Council of Australian Life Insurers	Customer Owned Banking Association
Deloitte Australia	Financial Services Council	Future Super
Great Southern Bank	Greenstone Financial Service	Heritage Bank
HESTA	Hostplus	HSBC Bank Australia Limited
IMB Bank	Impact Economics and Policy	ING Bank (Australia)

Insignia Financial	Insurance Australia Group	Insurance Council of Australia
IRESS	LINK Group	Macquarie Bank
Mercer Super	MinterEllison	MLC Insurance
Newcastle Permanent	NGS Super	Payright
People's Choice Credit Union	Perpetual Limited	QBE Insurance Group
Queensland Country Bank	Rest Super	Services Australia
Summerland Bank	Suncorp	Super Members Council of Australia
Swiss Re	TelstraSuper	Treasury
UniSuper	Westpac	Yamaha Financial Services
Zurich Financial Services Australia Limited		