

NOTICE OF FILING

Details of Filing

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| File Number: | VID289/2025 |
| File Title: | AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION v AUSTRALIANSUPER PTY LTD (ACN 006 457 987) |
| 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.



Statement of Claim

Federal Court of Australia
District Registry: Victoria
Division: General

No. VID289/2025

Australian Securities and Investments Commission

Plaintiff

AustralianSuper Pty Ltd (ACN 006 457 987)

Defendant

A. PARTIES

1. The plaintiff (**ASIC**), was at all material times:
 - (a) a body corporate established by section 8(1)(a) of the *Australian Securities and Investments Commission Act 2001* (Cth) (the **ASIC Act**);
 - (b) able to sue by operation of section 8(1)(d) of the ASIC Act;
 - (c) empowered to exercise the functions and powers conferred upon it under the ASIC Act and the *Corporations Act 2001* (Cth) (the **Corporations Act**), by operation of section 11 of the ASIC Act; and
 - (d) empowered to exercise the functions and powers conferred on it by other statutes identified in s 12A of the ASIC Act, including the *Superannuation Industry (Supervision) Act 1993* (Cth) (**SIS Act**).
2. The defendant (**AustralianSuper**):
 - (a) was at all material times:
 - (i) a corporation duly incorporated under the Corporations Act, and able to be sued;

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|---|---|-----|-----------------|
| Filed on behalf of (name & role of party) | Australian Securities and Investments Commission (the Plaintiff) | | |
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- (ii) the trustee of a regulated superannuation fund within the meaning of the SIS Act, known as AustralianSuper, and with Australian Prudential Regulation Authority (**APRA**) registration number R1001693 (the **Fund**);
 - (iii) the holder of a 'RSE licence' as that term is defined in section 10(1) of the SIS Act numbered L0000796 (**RSE Licence**) issued by APRA;
 - (iv) the holder of an Australian Financial Services Licence numbered 233788 (**AFS licence**);
 - (v) a "financial services licensee" for the purposes of section 912A of the Corporations Act;
 - (vi) authorised by its AFS licence to, amongst other things:
 - (A) provide financial product advice for, amongst other things, superannuation products to retail clients;
 - (B) deal in a financial product by issuing, applying for, acquiring, varying or disposing of a financial product in respect of superannuation to retail clients; and
 - (C) from 1 January 2021, provide a superannuation trustee service to retail clients;
 - (D) carry on a financial services business for the purposes of Part 7.6 of the Corporations Act; and
 - (vii) an issuer of superannuation products.
- (b) during the period between 1 July 2019 to 18 October 2024 (**Relevant Period**):
- (i) was responsible for making decisions about the payment of benefit entitlements pursuant to claims by and/or in respect of Fund members, including claims made by a member's legal personal representative, spouse, child or interdependent or some other individual(s) (**claimants**) after a member's death in respect of the member's accumulated superannuation account balance and any life insurance benefit payable in respect of a member (**Death Benefit Claims**), (**Claims Processing Services**); and
 - (ii) outsourced parts of the Claims Processing Services pursuant to the agreement pleaded in section B2 below.

B. FACTS AND REGULATORY BACKGROUND

B1. The Fund and the Trust Deed

3. The Fund is a 'regulated superannuation fund' and a 'registrable superannuation entity' as those terms are defined in ss 10(1) and 19 of the SIS Act.
4. AustralianSuper's relationship with members of the Fund was governed by a trust deed originally executed on or about 1 July 2006 and amended from time to time, including on 24 December 2021 (**Trust Deed**).
5. During the Relevant Period, the Trust Deed provided, among other things, that:
 - (a) any standard, covenant or other requirement under the SIS Act, the Corporations Act or any other statute or regulation of the Commonwealth of Australia or any State or Territory of Australia were incorporated into the Trust Deed to the extent that they apply to the Fund (clauses 1.1 and 2.2, definition of '**Relevant Requirements**');
 - (b) if there is a conflict between a provision of the Trust Deed and any of the Relevant Requirements, the Relevant Requirements shall prevail (clause 1.2); and
 - (c) the trustee of the Fund must pay any amount payable out of the Fund pursuant to the Trust Deed or the Relevant Requirements as a superannuation benefit when required by the Relevant Requirements (clause 23).

B2. AustralianSuper's outsourcing of claim processing services to Link

6. On or around 14 June 2019, AustralianSuper and Australian Administration Services Pty Limited ACN 003 429 114 (**Link**) entered into an administration and custody agreement (**Administration Agreement**).

Particulars

The Administration Agreement was in writing and was varied from time to time.

7. In the Relevant Period, pursuant to the Administration Agreement, Link was required to perform administration services in connection with the Fund including:
 - (a) customer contact via an inbound contact centre (phones, emails, online, mail or any other existing means or other means as agreed by the parties) focusing on a first call / contact resolution of the customer enquiry (Schedule 1, Clause 2.1);
 - (b) maintenance of proper and accurate customer records (Schedule 1, Clause 3.1);
 - (c) receipt, banking, processing and recording and application of contributions/proceeds remitted to the Fund (Schedule 1, Clause 3.2(a)(i));

- (d) management, calculation, processing and payment of all death, permanent incapacity, disability (total and permanent and salary continuance, i.e. income protection), terminal illness benefits, including any insurance claims (Schedule 1, Clause 3.2(a)(xvi));
- (e) calculation, processing and payment of all benefit payments (Schedule 1, Clause 3.2(a)(xvii));
- (f) administration of binding death benefit nominations (Schedule 1, Clause 3.2(a)(xx)); and
- (g) receipt, management (including approval of declination), processing and payment of death claims in accordance with the Business Rules, Relevant Requirements and agreed delegation process (Schedule 1, Clause 4.2(a)(iv)).

8. It was a term of the Administration Agreement that:

- (a) Link would provide services under the Administration Agreement in accordance with:
 - (i) any requirements that apply to AustralianSuper under any Law including the SIS Act and Corporations Act and its AFS licence;
 - (ii) the performance standards set out in Schedule 3 of the Administration Agreement (**Performance Standards**); and
 - (iii) AustralianSuper's Business Rules,

as amended from time to time by agreement in writing (clause 1.1 (definition of Performance Standards, Business Rules and Relevant Requirements) and clauses 7.2 and 7.9).
- (b) at the written request of AustralianSuper, Link would, at a time that is reasonable in the circumstances, allow AustralianSuper to, amongst other things:
 - (i) conduct on-site visits at Link's premises;
 - (ii) access, inspect and take copies of records, systems or other documents or information in respect of the Administration Agreement or the Fund;
 - (iii) meet directly with Link personnel (clause 11(e)(i), (vi), (vii) and (viii)).

9. In the Relevant Period, Link and AustralianSuper agreed to adopt certain service levels including:

- (a) all correspondence which requires a response or dispatch of documentation, to be answered or acknowledged within 5 business days (Schedule 3, Item 5.4 of the Administration Agreement); and
 - (b) at least 95% of Death Benefit Claims were to receive an appropriate response or referral to AustralianSuper within 5 business days of receipt of any notification, correspondence or contact regarding a claim (AustralianSuper's Business Rules as varied from time to time).
- 10. Pursuant to s 34C(1) of the SIS Act, APRA could determine standards relating to prudential matters that must be complied with by all 'RSE licensees'.
- 11. On 15 November 2012, APRA determined under s 34C(1) of the SIS Act that a prudential standard entitled 'Prudential Standard SPS 231 Outsourcing' applied to all 'RSE licensees' (**SPS 231**).
- 12. By reason of holding the RSE Licence, AustralianSuper was required to comply with SPS 231 from 1 July 2013, being the date that SPS 231 commenced.
- 13. As it applied to AustralianSuper, SPS 231 provided, among other things, that:
 - (a) AustralianSuper's Board was ultimately responsible for any outsourcing of a material business activity undertaken by a 'RSE licensee', and AustralianSuper was responsible for complying with all prudential requirements and all other non-delegable legal obligations relating to the outsourced business activity (paragraph 13);
 - (b) AustralianSuper's Board must approve AustralianSuper's outsourcing policy, which must set out its approach to outsourcing material business activities, including a detailed framework for managing all such outsourcing arrangements (paragraph 15);
 - (c) any outsourcing agreement must address minimum matters, including service levels and performance requirements, the form in which data is to be kept, clear provisions identifying ownership and control of the data, reporting requirements including the content and frequency of reporting, and audit and monitoring procedures (paragraph 21);
 - (d) AustralianSuper must ensure it has sufficient and appropriate resources to manage and monitor any outsourcing arrangement at all times (paragraph 30); and

- (e) AustralianSuper was required to advise APRA of any significant problems that have the potential to materially affect the outsourcing arrangement and, consequently, materially affect AustralianSuper's business operations or the interests of beneficiaries (paragraph 31),

(severally and collectively, the **SPS 231 Requirements**).

B3. Claims Processing Service for Death Benefit Claims

14. In the Relevant Period, as part of the outsourcing of the Claims Processing Services under the Administration Agreement, on the death of a member:

- (a) Link was notified of the member's death upon being contacted by a claimant;
- (b) Link was required to liaise with the claimant and provide them with the relevant documentation and forms (**Claims Pack**) necessary to process payments to the member's nominated or determined beneficiary or beneficiaries (**Necessary Information**);

Particulars

The Claims Pack contained information about applying for payment after the death of a member, a claim application form and a checklist.

- (c) upon receipt of the Necessary Information, Link was required to form a view and make a recommendation to AustralianSuper as to whom a death benefit should be paid (**Recommendation**);

Particulars

AustralianSuper's Business Rules.

- (d) AustralianSuper was required to review the Recommendation (the **Review**) and make a determination (**Determination**) to direct Link to:
 - (i) send a letter to the claimant and/or relevant parties informing them:
 - (A) of the Determination;
 - (B) if the claimant agreed with the Determination they may sign and return the attached acknowledgement form confirming their acceptance of the Determination (**Acknowledgement Form**);
 - (C) if they disagreed with the Determination they have 28 days from receipt of the letter to lodge an objection, in which case AustralianSuper would

- reconsider the Determination;
- (D) if no objection was received, the Death Benefit Claim would be processed in accordance with the Determination;
- (E) if EFT payment details were not provided, payment would be made by cheque (**28 Day Letter**);
- (ii) waive the requirement for a 28 Day Letter and progress the claim immediately to payment to the recipient/s of the death benefit in accordance with the Determination.
- (e) If a Determination was made to send a 28 Day Letter and a 28 Day Letter was sent:
 - (i) where there was no objection to the Determination, Link referred or ought to have referred the Death Benefit Claim for payment upon the earlier of:
 - 1. all claimants signing and returning the Acknowledgement Form; or
 - 2. if not all claimants signed and returned the Acknowledgement Form, 5 weeks after the 28 Days Letter was sent (or 7 weeks if the 28 Days Letter was sent overseas); or
 - (ii) where there was an objection received, Link referred or ought to have referred the Death Benefit Claim back to AustralianSuper to reconsider its Determination.
- (f) Once a Death Benefit Claim was referred for payment, the Death Benefit Claim was paid or ought to have been paid in accordance with the Determination to pay the member's nominated (or determined) beneficiaries within 5 business days (AustralianSuper's Business Rules).

B4. AustralianSuper's obligations under the Corporations Act

- 15. The Claims Processing Services were, during the Relevant Period:
 - (a) a 'financial service' within the meaning of section 766A(1) of the Corporations Act (**Financial Service**) as they comprised:
 - (i) from 1 January 2021, a 'superannuation trustee service' within the meaning of section 766H(1) of the Corporations Act;
 - (ii) at all times, 'dealing' in a 'superannuation product' within the meaning of section 766C(1) of the Corporations Act; and
 - (b) a Financial Service that AustralianSuper was required by s 912A(1)(a) of the

Corporations Act to provide efficiently, honestly and fairly.

16. At all times during the Relevant Period, AustralianSuper, as trustee of the Fund, remained legally responsible for the proper administration of the Fund and for the provision of the Claims Processing Services.
17. As a financial services licensee, AustralianSuper was required by s 912A(1)(c) of the Corporations Act to comply with the financial services laws, including the SIS Act to the extent it covered conduct relating to the provision of financial services.

B5. AustralianSuper's obligations under the SIS Act and Regulations

18. During the Relevant Period, AustralianSuper was required to cash death benefits as soon as practicable after the member dies in accordance with reg 6.21(1) of the *Superannuation Industry (Supervision) Regulations 1994* (Cth) (**Regulations**).

Particulars

Sections 31(1) and 34(1) of the SIS Act and regulation 6.21(1) of the Regulations.

B6. AustralianSuper's obligation to efficiently process Death Benefit Claims

19. By reason of the matters pleaded in paragraphs 17 and 18 above, AustralianSuper was, during the Relevant Period, required to make payment of a member's benefits as soon as practicable after the member dies.
20. By reason of the matters pleaded in paragraphs 11 to 13 and 15 to 19 above, AustralianSuper was required to:
 - (a) have systems in place that enabled and ensured the efficient processing of Death Benefit Claims, including by:
 - (i) maintaining accurate claims files readily accessible to all relevant staff;
 - (ii) ensuring that each claim file included all records of communications with or about a relevant claimant;
 - (iii) have sufficient and appropriate resources internally to oversee and manage Death Benefit Claims;
 - (b) adequately monitor and manage Link's performance under the Administration Agreement;
 - (c) ensure that AustralianSuper held accurate and complete data necessary to determine

the volume and age of all Death Benefit Claims, including by exercising its rights under the Administration Agreement referred to in paragraph 7 above to:

- (i) require Link to regularly report all information reasonably necessary to determine the volume and age of all Death Benefit Claims;
 - (ii) audit Link to verify the accuracy and completeness of all information provided by Link; and
 - (iii) if the outcome of any audit showed that AustralianSuper was not receiving accurate and complete information from Link, take all reasonable steps to ensure it received accurate and complete information from Link;
- (d) take all reasonable steps to ensure that Death Benefit Claims were being processed in compliance with reg 6.21(1) of the Regulations, including by:
- (i) adequately monitoring Link's processing of Death Benefit Claims, including the way in which Link maintained its data systems;
 - (ii) ensuring that Link complied with the Performance Standards, Relevant Requirements and AustralianSuper's Business Rules, including by taking all reasonable steps to correct any failure by Link to adhere to each of them;
 - (iii) ensuring that Link had sufficient and appropriate resources, including by AustralianSuper supplementing those resources if and when the need arose;
 - (iv) when appropriate, taking action to address Link's non-performance, including by:
 - a. issuing a formal letter to Link in relation to Link's non-performance; and
 - b. terminating its arrangements with Link and/or putting in place appropriate alternative or supplementary arrangements to process the Death Benefit Claims;
- (e) cease charging monthly administration fees from the deceased member's accounts during periods of unreasonable delay;
- (f) have records and systems in place that enabled and ensured the efficient identification and remediation of any claimants adversely affected by delayed processing of Death Benefit Claims.

C. AUSTRALIANSUPER'S FAILURES TO PAY DEATH BENEFITS AS SOON PRACTICABLE

21. During the Relevant Period, AustralianSuper took between four months and four years from the date the claim form was returned to pay or decline:

- (a) at least 6,699 Death Benefit Claims in respect of which no objection to the claim was received (**No Objection Claims**).

Particulars

By response to ASIC Notice NTC2527600 received from AustralianSuper on 5 February 2025, table 4, AustralianSuper identified 6,897 No Objection Claims.

In correspondence from AustralianSuper pursuant to paragraph 6 of the orders of the Honourable Justice O'Callaghan dated 5 May 2025, AustralianSuper updated the number of No Objection Claims to 6,699.

This number excludes claims made in the Relevant Period that remained open as at 22 January 2025.

- (b) at least 941 of the No Objection Claims in respect of members for which AustralianSuper held a valid binding death benefit nomination (**BDBN Members**).

Particulars

Response to ASIC Notice NTC2527600 received from AustralianSuper on 5 February 2025, table 8.

The numbers exclude claims made in the Relevant Period that remained open as at 22 January 2025.

22. AustralianSuper did not make payment in respect of:

- (a) each of the No Objection Claims; alternatively
- (b) each of the No Objection Claims for BDBN Members,

as soon as reasonably practicable.

Particulars

That AustralianSuper did not make payment in respect of each of the No Objection Claims, alternatively each of the No Objection Claims for BDBN Members, as soon as reasonably practicable is to be inferred from:

- (i) the fact that AustralianSuper is providing compensation to the claimants in respect of 6,561 of the No Objection Claims;
- (ii) the delays referred to in paragraphs 23 to 27 below in relation to claims that are subsets of the No Objection Claims; and
- (iii) the matters set out in section D below.

ASIC does not suggest that 4 months is an appropriate period in all cases. In many cases, the obligation to pay a member's benefit as soon as practicable after the member dies will only be satisfied if the benefit is paid in a much shorter period of time.

Further particulars may be provided following discovery.

23. During the Relevant Period, AustralianSuper took between 15 and 213 days from the date of first being informed of a member's death to provide a Claims Pack to the first claimant in respect of at least¹ 254 Death Benefit Claims.

Particulars

The deceased member's unique member identifier, the date AustralianSuper identifies as the date on which it was first notified of the Death Benefit Claim and the date of dispatch of the Claims Pack for each of the 254 members are enumerated in Schedule 1.

24. During the Relevant Period, AustralianSuper took between 15 and 92 days from the date Link made a Recommendation to review Link's Recommendation and make a Determination whether to pay the death benefit and/or request further information on at least 207 occasions.

Particulars

The deceased member's unique member identifier, the date AustralianSuper identifies that it received Link's Recommendation on the Death Benefit Claim and the date AustralianSuper identifies that it reviewed the Recommendation for each of the 207 Death Benefit Claims are enumerated in Schedule 2.

¹ AustralianSuper was unable to provide the data required to assess delay without a manual file review in most instances. ASIC refers to and repeats paragraphs 55 to 62 below. For this reason, the number of Death Benefit Claims referred to in paragraphs **Error! Reference source not found.** and **Error! Reference source not found.** – 27 of this Statement of Claim are only a sample of claims that are impacted by the types of delay referred to in those paragraphs, based on a manual review of a sample of claims files produced by AustralianSuper.

25. During the Relevant Period, AustralianSuper took between 15 and 368 days to notify claimants of a Determination after the Determination was made on at least 228 occasions.

Particulars

The deceased member's unique member identifier, the status of the claim as a No Objection Claim in relation to a BDBN Member, and the time between the Determination and the date the claimant was notified of the Determination are enumerated for each of the 228 Death Benefit Claims in Schedule 3.

26. During the Relevant Period, AustralianSuper took between 15 and 1,140 days from the date of receipt of all information required to pay the death benefit on at least 256 occasions.

Particulars

The deceased member's unique member identifier, the date by which all information required to pay the member's benefits was received and the date of payment are enumerated in Schedule 4.

27. During the Relevant Period, AustralianSuper took between 15 and 529 days to request from the claimant information or additional information required to further process the Death Benefit Claim or respond to enquiries from a claimant about the Death Benefit Claim on at least 88 occasions.

Particulars

Examples of instances where there was a failure to request information required to process the payment of a member's benefits are enumerated in Schedule 5.

28. By reason of the matters in paragraphs 23 to 27 above, AustralianSuper failed to make payment of a member's benefits as soon as practicable after the relevant member's death, in contravention of s 34(1) of the SIS Act and reg 6.21(1) of the Regulations on at least 700 occasions.

Particulars

The delays pleaded in paragraphs 23 to 27 above related to 700 members, of which 514 were BDBN Members.

A failure to:

- (i) dispatch a standard Claims Pack form to a claimant within 14 days of being notified of the relevant member's death;
- (ii) review a recommendation made by Link as to payment

of a death benefit and to make a decision on whether to pay the death benefit and/or seek further information within 14 days of the recommendation being made;

- (iii) notify claimants of a decision to pay a Death Benefit Claim within 14 days;
- (iv) request from the claimant information or additional information required to make a Determination within 14 days of the claim being received

was unreasonable in the context of the obligation to make payment as soon as practical after the member's death.

ASIC contends that each of the above delays had the necessary consequence that AustralianSuper failed to make payment of a member's benefits as soon as practicable after the relevant member's death.

ASIC does not suggest that 14 days to take each of the steps is an appropriate period in all cases. In many cases, the obligation to pay a member's benefit as soon as practicable after the member dies will only be satisfied if each of the steps is taken in a much shorter period of time.

Further particulars may be provided following discovery.

- 29. By reason of the matters pleaded in paragraphs 22 to 28 above, AustralianSuper contravened s 912A(1)(c) of the Corporations Act on at least 6,699 occasions.
- 30. Alternatively to paragraph 29, by reason of the matters pleaded in paragraph 28 above, AustralianSuper contravened s 912A(1)(c) of the Corporations Act on at least 700 occasions.

D. AUSTRALIANSUPER'S FAILURES TO PROCESS DEATH BENEFIT CLAIMS EFFICIENTLY, HONESTLY AND FAIRLY

- 31. From in or about May 2020, Link began to experience a delay in its processing of Death Benefit Claims (**Death Claims Backlog**).

Particulars

Death claims backlog internal audit review prepared by the Chief Audit Executive AustralianSuper (ASC.0001.0001.0036).

- 32. On or about June 2020, a recovery plan to address the Death Claims Backlog was prepared.

Particulars

The recovery plan was in writing (ASC.0001.0002.0046). This recovery plan sought to return Death Claims Processing to normal service levels by the week

commencing 17 August 2020.

33. In or about August 2020, a further recovery plan to address the Death Claims Backlog was prepared.

Particulars

The recovery plan was in writing (ASC.0001.0012.8593). This recovery plan revised the previous forecast to return Death Claims Processing to normal service levels by mid-October 2020.

34. From 10 November 2020, the issue of the Death Claims Backlog was reported to AustralianSuper's Member and Employer Services Committee (**MESC**), which reported directly to AustralianSuper's Board and included a Director.

Particulars

From at least 10 November 2020 until 30 November 2022, the Death Claims Backlog was referred to in MESC meetings and papers presented to MESC in general terms from time to time.

Minutes of meetings dated:

10 November 2020 (ASC.0104.1435.0052);
30 November 2021 (ASC.0001.0002.1282);
14 April 2021 (ASC.0001.0002.1401);
7 June 2022 (ASC.0001.0002.1436);
10 October 2022 (ASC.0001.0002.1310); and
30 November 2022 (ASC.0001.0002.1428).

Complaints Reports dated:

20 October 2020 (ASC.0001.0020.1697);
20 January 2022 (ASC.0001.0020.1742);
16 May 2022 (ASC.0001.0020.1881);
8 September 2022 (ASC.0001.0020.1918); and
10 November 2022 (ASC.0001.0020.1986).

Insurance Claims and Underwriting Reports dated:

20 May 2021 (ASC.0001.0021.0124);
8 November 2021 (ASC.0001.0020.1727);
17 January 2022 (ASC.0001.0020.1737); and
21 March 2022 (ASC.0001.0020.1831).

35. In January 2021, operational reporting from Link identified that service levels for Death Benefit Claim processing were falling further behind.

Particulars

AustralianSuper letter to ASIC dated 3 November 2023.

36. In or about April 2021, the Death Claims Backlog was recorded as an incident in AustralianSuper's Group Risk and Compliance System.

Particulars

INC-6083 recorded that "Link advised that the death benefits team was currently working on Day 17 (SLA is 5 days) and that there were between 700-800 items in the backlog."

37. In or about May 2021, a further recovery plan to address the Death Claims Backlog was prepared.

Particulars

The recovery plan was in writing (ASC.0001.0012.8807). This recovery plan revised the previous forecast to return Death Claims Processing to normal service levels. At this time AustralianSuper stated that it was "*confident work will be within service expectations by early June 2021*" (ASC.0001.0021.0124).

38. Between May 2021 and April 2022, the forecast to return Death Claims Processing to within service levels was revised several times.

Particulars

A report dated 8 October 2021 was provided to the AustralianSuper Board, which stated that the "*initial target to be within service expectations by early June 2021 did not eventuate ... The expectation is that the team will be within service standards by early November 2021*" (ASC.0001.0020.0408).

A report dated 8 November 2021 was provided to the MESC, which stated that "*...the new target of being within service expectations by early November 2021 did not eventuate... As a high proportion of the team are new starters training effort is required and a longer lead time for them to independently manage a full portfolio. This is expected to occur by the end of January 2022 and the Team to be within service expectations by this date at the latest*" (ASC.0001.0020.1727).

A report dated 21 March 2022 was provided to the MESC that stated "*Member/claimant complaints in relation to delays in decisions are increasing, as are service-related complaints. The matter is subject to escalation to Senior Management at Link and we are engaging and agreeing on sustainable recovery solutions*" (ASC.0001.0020.1831).

39. In or about April 2022, a further recovery plan to address the Death Claims Backlog was implemented.

Particulars

The recovery plan was in writing (ASC.0001.0012.8606). It was planned to return death claims to agreed service standards by 30 June 2022.

40. On or about 24 May 2022, AustralianSuper's Senior Manager, Member Advocacy & Dispute Resolution was informed by her direct report that AustralianSuper may be considered to be in breach of the Corporations Act and the SIS Act by reason of the Death Claims Backlog.

Particulars

AustralianSuper's Senior Manager, Member Advocacy & Dispute Resolution was informed by email from a Manager of Dispute Resolution that: *"The backlog does raise the issue that it may be considered that we are in breach of the corporations act and SIS act, however we are doing everything in our power to bring LINK back into SLA. There is a potential for more complaints and requests for compensation due to financial loss, particularly in a market that is volatile"* (ASC.0104.1206.8668).

41. From at least 25 May 2022, AustralianSuper's Incident Review Group (**IRG**) was informed from time to time about the Death Claims Backlog.

Particulars

Minutes of meeting of the IRG meetings held:
25 May 2022 (ASC.0001.0002.0203);
1 June 2022 (ASC.0001.0019.0124);
10 June 2022 (ASC.0001.0019.0129);
22 June 2022 (ASC.0001.0019.0134);
27 July 2022 (ASC.0001.0002.0207); and
16 November 2022 (ASC.0001.0019.0138).

42. Between approximately July 2019 and July 2022, the Fund experienced an approximate 26 percent growth in membership.
43. On or about 8 August 2022, AustralianSuper wrote to Link regarding the failures of its outsourcing arrangements with Link to deliver services on time and to the required standard.

Particulars

Letter from AustralianSuper to Link dated 8 August 2022 (ASC.0104.1380.7116).

44. On or about 27 September 2022, AustralianSuper requested Link provide a written proposal

outlining the steps Link will take to restore and maintain the Performance Standards by 30 October 2022.

Particulars

The request was in writing by letter from the then Group Executive – Member Experience of AustralianSuper to Link (ASC.0001.0021.0671).

45. As at 11 October 2022, the target date for completion of the April 2022 recovery plan was revised to 31 December 2022.

Particulars

The Annual Claims and Underwriting Report prepared by AustralianSuper's Senior Manager, Insurance Claims stated at item 7.6:

"The commitment from LINK to be operating within timeliness and quality expectations by 30 June 2022 did not occur. While the Claims Assessment Teams are now meeting their targets, the revised forecast for recovery of the Death Claims Team is 31 December 2022" (ASC.0001.0015.0034).

46. As at 24 October 2022, there were approximately 4,658 Death Benefit Claims in the Death Claims Backlog.

Particulars

Overview of AustralianSuper Death Claims prepared by the Head of Customer Operations Transition stated at item 8.1:

"The remaining Pods working on the backlog will gradually pivot from the current task-based approach to a case management model, with a focus on contacting claimants and progressing active claims to the most up-to-date status, including closure. Approximately 4,658 claims (as of 24 October 2022) were split across the remaining Pods of approximately 25 Case Managers in total. Work items for these claims were and are still being allocated based on escalations, priority and oldest items." (ASC.0001.0020.2314)

47. On or about 30 November 2022, the Death Claims Backlog was raised at a MESC meeting as an emerging risk.

Particulars

Death claims backlog internal audit review prepared by the Chief Audit Executive stated at item 6.2 (ASC.0001.0001.0036):

"An emerging risk relating to a backlog in death claims was raised by Group Risk at the MESC meeting held on 30 November 2022."

MESC minutes of meeting dated 30 November 2022 (ASC.0001.0002.1428).

48. On or about 15 December 2022, AustralianSuper's Breach Reporting Panel was informed that there were approximately 2,628 active Death Benefit Claim cases, many of which were well over a four-month timeframe, and 1,349 pending Death Benefit Claim cases.

Particulars

BRP meeting minutes (ASC.0001.0002.0227).

49. On or about 15 December 2022, the Death Claims Backlog was raised with the Board of AustralianSuper.

Particulars

Minutes of Board of Directors dated 15 December 2022 (ASC.0001.0002.0842).

50. As at December 2022, there were 4,017 Death Benefit Claims in the Death Claims Backlog.

Particulars

AustralianSuper Insurance Report prepared by Link dated 16 January 2023 (ASC.0001.0011.6693).

51. In or about late January 2023, there were 4,427 Death Benefit Claims in the Death Claims Backlog.

Particulars

Risk and Compliance Report to MESC dated 14 February 2022 (ASC.0001.0020.1781).

Death claims backlog internal audit review prepared by the Chief Audit Executive (ASC.0001.0001.0036).

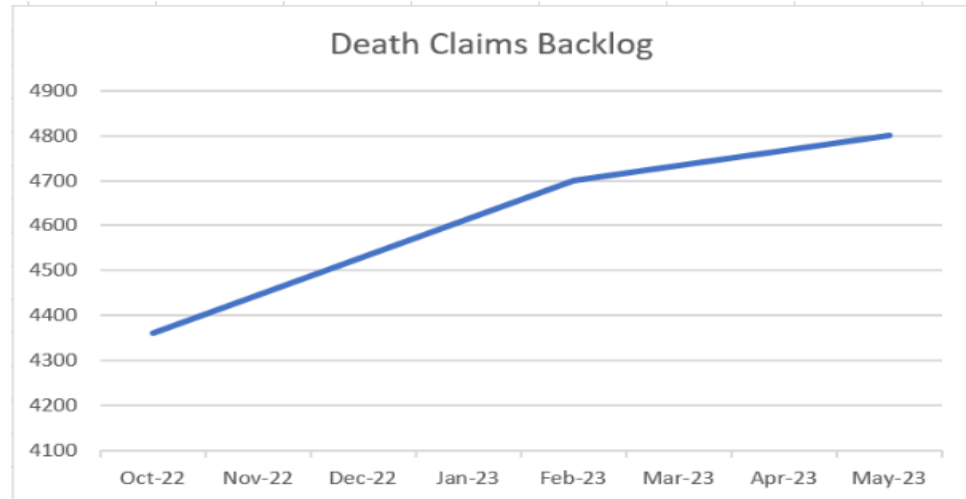
52. On or about 23 June 2023, AustralianSuper prepared an internal report on the Death Benefit Claims processes, which recorded that:

- (a) there had been an increase in the Death Claims Backlog since it was "*highlighted as a problem*" in October 2022;

Particulars

The report was in writing and was entitled "Death Claims – AUXO Analysis". (ASC.0104.1339.2714)

The increase was depicted in the following table at page 14.



- (b) the work practices were highly inefficient as a result of many different technology platforms in use, which required manual emails to be sent back and forth to access necessary information to process Death Benefit Claims.

Particulars

Table 7 on page 16 of the report stated:

"The work practices hold unnecessary administrative overhead because of many different technology platforms in use (28 different technologies used to deliver 1 or 2 Services). One type of technology to transfer documents, another to store documents, another to communicate, another to track workflow, prioritise/manage workload and more. Additionally, each of the participating organisations (TAL Link Group AustralianSuper) use their own in-house technology for many of these activities. Many manual emails are sent back and forth between these systems to request information, ask for progress updates, and seek outcomes that are in technology that is not accessible to all involved. This creates unnecessary administrative overhead.

Link Group manually rename all the documents received from a claimant so that they are searchable in RM8. Because of the volumes this is not always done, and the manual effort creates risk of typo's further complicating the ability to search efficiently."

53. On or about 16 August 2023, AustralianSuper commenced a formal investigation into the Death Claims Backlog.

54. On or about 15 September 2023, AustralianSuper lodged a reportable situation report with ASIC (**September 2023 Reportable Situation Report**) notifying ASIC that:
- (a) it had commenced an investigation into the Death Claims Backlog on 16 August 2023;
 - (b) as at 25 August 2023, there were:
 - (i) 2,792 Death Claims greater than six months old; and
 - (ii) 1,591 Death Claims greater than twelve months old.
 - (c) from in or about March 2020 to 15 September 2023, AustralianSuper received at least 3,857 complaints in relation to the delayed processing of Death Benefit Claims.

Particulars

Reportable situation report lodged by AustralianSuper with ASIC on 15 September 2023 (ASC.0104.1153.1417).

55. Throughout the Relevant Period AustralianSuper did not maintain a central repository of claims data and documentation on a member-by-member basis.

Particulars

On 18 October 2024, ASIC issued to AustralianSuper a notice under section 33 of the *Australian Securities and Investments Commission Act* (Cth), bearing barcode NTC2425922, requiring production of certain claims files.

On 25 October 2024, AustralianSuper indicated that Link *"estimates that it will take, on average, approximately 10 hours per claim to identify those documents, including internal and external emails, letters, forms, call recordings, and notes from internal claims systems (PEGA and Aaspire). This estimate of 10 hours per claim already factors in potential 'shortcuts' that can be used in their collection process."*

On 30 October 2024, AustralianSuper further stated *"...call recordings, file notes, internal and external communications and other claim documents are each stored in different systems, and the same document type (e.g., call recordings) can span over multiple systems depending on the date of the claim... call data is stored by staff member and is not organised by member number or claim number... [Link] does not hold a single 'claim file' in relation to AustralianSuper members. Therefore, searches are required to be conducted across multiple systems to identify responsive records, adding complexity to the process for collecting each of the documents required by this Notice."*

On 11 November 2024, AustralianSuper further stated that *"documents that are relevant to each Death Benefit Claim and that are responsive to the Notice are stored across numerous IT systems that mostly require manual extraction."*

56. On 3 November 2023, AustralianSuper responded to a request from ASIC for further information regarding the September 2023 Reportable Situation Report, in which AustralianSuper:
- (a) provided data pertaining to Death Benefit Claim volumes and durations for the period from June 2020 to September 2023 (**Death Claim Data**);
 - (b) acknowledged “inconsistencies with the [Death Claim Data] where total claims outstanding at the end of the month cannot be reconciled using the ‘Total received’ and ‘Total closed’ columns”; and
 - (c) stated that some of the reasons for the inconsistencies included that “[a] minority of dates from Link’s workflow system (PEGA) cases don’t flow through to the data and are manually identified.”
57. On 20 September 2024, ASIC issued a notice under section 912C(1) of the Corporations Act, seeking production of information (**September notice**).

Particulars

The notice bore barcode NTC2425448. The information sought included information relating to the Death Benefit Claims that AustralianSuper failed to pay as soon as practicable after the member died that were identified as a result of the investigation commenced on 16 August 2023 in connection with INC-10355 and the reportable situation report lodged by AustralianSuper with ASIC on 15 September 2023 (updated around 17 November 2023) (**category 2**).

58. By letter to ASIC dated 25 September 2024, AustralianSuper stated that some of the information sought in the September notice was not “‘readily available (in whole or part)’ from electronic systems maintained by AustralianSuper or its agents” (including Link), including in relation to category 2.
59. The data produced by AustralianSuper in response to the September notice:
- (a) recorded some Death Benefit Claims as pending, meaning no response had been received from the claimant despite follow up from AustralianSuper, when in fact documents had been received from claimants but these documents had not been recorded in the relevant systems so as to re-open the claim (**pending claims issue**);

Particulars

AustralianSuper reportable situation report dated 13 May 2025.

- (b) contained duplicate and/or inconsistent entries for numerous members (**multiple entries issue**); and
 - (c) was missing data identifying the date the first claim application form was received for each deceased member (**first application form date**).
60. By letter to ASIC dated 15 November 2024, AustralianSuper stated that the multiple entries issue was 'mainly' created where:
- (a) a claim was closed but new information was received, and instead of re-opening the closed record, a new claim record was started;
 - (b) documents were received, and a new claim record was created, instead of linking the documents to the existing claim record; or
 - (c) the initial contact was an enquiry (ie, a request for information which did not contain sufficient detail to be formalised as a claim) which was closed, and a new claim record was created once formal notification was received rather than notification.
61. By email to ASIC sent 5 December 2024, AustralianSuper explained that in order to identify the date that the first application form was received for a Death Benefit Claim, where it was not recorded in its systems:
- (a) the case management team have manually reviewed all imaged documents stored in RM8 (Link's imaging system) to identify the relevant date;
 - (b) the date identified by the relevant case manager was recorded in an Excel workbook; and
 - (c) a comprehensive peer review process was undertaken to ensure the date recorded for each death benefit (as per step 2) was correct.

Particulars

Email from AustralianSuper's General Counsel to ASIC sent at or about 10.57 am on 5 December 2024.

62. AustralianSuper was unable to readily and accurately identify how many claims for a death benefit payment were made after 30 June 2019 where the claim was not paid within four months of the claim first being notified, the member had provided a binding death benefit nomination and no objection was received by AustralianSuper (**No Objection BDBN Claims**).

Particulars

On 18 October 2024, ASIC issued to AustralianSuper a notice under section 33 of the Australian Securities and Investments Commission Act (Cth), bearing barcode NTC2425922, requiring production of No Objection BDBN Claim files.

On 22 October 2024, AustralianSuper estimated that there would be 2,000 responsive claim files.

On 25 October 2024, AustralianSuper indicated that there were 736 responsive claim files.

On 30 October 2024, AustralianSuper indicated that it now considered that there were 794 responsive claim files.

On 8 November 2024, AustralianSuper indicated that it had identified that objections were raised in relation to a number of those claims and that, therefore, those claims fall outside the relevant definition and there were only 763 responsive claims.

On 18 December 2024, AustralianSuper informed ASIC that it had identified an additional 174 claims that met the relevant definition.

63. Despite the Death Claims Backlog, AustralianSuper continued charging monthly administration fees from deceased member's accounts during periods of unreasonable delay.

Particulars

The matter alleged is to be inferred from the fact that AustralianSuper has commenced a program to compensate beneficiaries for inter alia, the monthly administration fees charged during periods of unreasonable delay.

Further particulars will be provided following discovery.

As at 30 May 2025 compensation had not been paid to all of the No Objection Claims.

64. It was not until December 2024 that AustralianSuper commenced a program to compensate beneficiaries for loss suffered because of periods of unreasonable delay which occurred after a claim form was returned (**Remediation Program**).
65. As at 2 December 2024, AustralianSuper expected to compensate approximately 7,000 beneficiaries a total amount of approximately \$4,200,000 through the Remediation Program.

Particulars

AustralianSuper website:
<https://www.australiansuper.com/about-us/newsroom/2024/12/compensation-for-delayed-death->

benefit-claims

66. By reason of the matters set out in paragraphs 31 to 65 above, AustralianSuper:

- (a) failed to have records and systems in place that enabled and ensured the efficient processing of Death Benefit Claims;
- (b) failed to adequately monitor and manage Link's performance under the Administration Agreement;
- (c) failed to ensure that Link had sufficient and appropriate resources to process Death Benefit Claims within a reasonable time and to comply with reg 6.21(1) of the Regulations;
- (d) failed to ensure that it held accurate and complete data necessary to determine the volume and age of all Death Benefit Claims, including by exercising its rights under the Administration Agreement alleged in paragraph 7 above to:
 - (i) require Link to regularly report all information reasonably necessary to determine the volume and age of all Death Benefit Claims;
 - (ii) audit Link to verify the accuracy and completeness of all information provided by Link; and
 - (iii) if the outcome of any audit showed that it was not receiving accurate and complete information from Link, take all reasonable steps to ensure it received accurate and complete information from Link;
- (e) failed to take all reasonable steps to ensure that Death Benefit Claims were being processed within a reasonable period of time, including by:
 - (i) adequately monitoring Link's processing of Death Benefit Claims, including the way in which Link maintained its data systems;
 - (ii) ensuring that Link complied with the Performance Standards, Relevant Requirements and AustralianSuper's Business Rules including by taking all reasonable steps to correct any failure by Link to adhere to each of them;
 - (iii) ensuring that Link had sufficient and appropriate resources;
 - (iv) issuing a formal letter to Link in relation to Link's continued non-performance relating to the management of Death Benefit Claims prior to 8 August 2022, and between the letters sent on 27 September 2022 and 27 July 2023;
 - (v) terminating its arrangements with Link and/or putting in place appropriate

alternative or supplementary arrangements to process the Death Benefit Claims;

- (f) failed to cease charging monthly administration fees from the deceased member's accounts during periods of unreasonable delay;
- (g) failed to have records and systems in place that enabled and ensured the efficient identification and remediation of claimants; and/or
- (h) failed to provide suitable and timely remediation to claimants adversely affected by the Death Claims Backlog.

67. By reason of the matters pleaded in paragraph 21 to 66 above, during the Relevant Period, AustralianSuper failed to provide the Claims Processing Services for Death Benefit Claims efficiently, honestly and fairly in contravention of s 912A(1)(a) of the Corporations Act.

68. By reason of the above contraventions of s 912A(1)(a), AustralianSuper contravened s 912A(5A) of the Corporations Act.

AND THE PLAINTIFF SEEKS:

ASIC claims the relief set out in the Originating Process filed on 11 March 2025.

Date: 30 May 2025

Catherine Macrae

.....
Signed by Catherine Macrae
Lawyer for the plaintiff

This pleading was prepared by Jonathon Moore KC, Christina Klemis and Vicki Bell of Counsel

Schedule 1 – Delay in sending claims packs

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies as the first notification of claim | First date claims pack sent | Days taken to send claims pack after claim notification |
|----|--------------------------|-----------------------------|--|-----------------------------|---|
| 1 | 238 | N | 04/01/2022 | 05/08/2022 | 213 |
| 2 | 187 | Y | 25/01/2022 | 16/08/2022 | 203 |
| 3 | 146 | Y | 04/02/2022 | 05/07/2022 | 151 |
| 4 | 544 | Y | 11/01/2022 | 24/05/2022 | 133 |
| 5 | 574 | Y | 12/05/2023 | 14/09/2023 | 125 |
| 6 | 304 | N | 04/12/2023 | 27/03/2024 | 114 |
| 7 | 220 | Y | 16/07/2021 | 27/10/2021 | 103 |
| 8 | 367 | Y | 12/10/2022 | 12/01/2023 | 92 |
| 9 | 097 | Y | 12/10/2022 | 07/01/2023 | 87 |
| 10 | 063 | Y | 30/12/2021 | 24/03/2022 | 84 |
| 11 | 130 | Y | 01/09/2022 | 24/11/2022 | 84 |
| 12 | 641 | Y | 29/11/2022 | 15/02/2023 | 78 |
| 13 | 101 | Y | 08/06/2022 | 19/08/2022 | 72 |
| 14 | 625 | Y | 22/07/2022 | 30/09/2022 | 70 |
| 15 | 646 | Y | 29/11/2022 | 06/02/2023 | 69 |
| 16 | 376 | N | 16/11/2022 | 24/01/2023 | 69 |
| 17 | 226 | Y | 11/11/2022 | 18/01/2023 | 68 |
| 18 | 466 | Y | 12/09/2022 | 15/11/2022 | 64 |
| 19 | 061 | Y | 03/03/2023 | 04/05/2023 | 62 |
| 20 | 470 | Y | 08/04/2022 | 09/06/2022 | 62 |
| 21 | 015 | Y | 10/06/2022 | 10/08/2022 | 61 |
| 22 | 005 | Y | 14/10/2022 | 13/12/2022 | 60 |
| 23 | 500 | N | 13/09/2022 | 11/11/2022 | 59 |
| 24 | 330 | Y | 16/08/2022 | 13/10/2022 | 58 |
| 25 | 464 | Y | 06/06/2023 | 03/08/2023 | 58 |
| 26 | 380 | Y | 29/08/2022 | 24/10/2022 | 56 |
| 27 | 083 | Y | 29/08/2022 | 24/10/2022 | 56 |
| 28 | 346 | N | 29/09/2022 | 24/11/2022 | 56 |
| 29 | 206 | Y | 16/08/2022 | 10/10/2022 | 55 |
| 30 | 345 | Y | 12/09/2022 | 02/11/2022 | 51 |
| 31 | 597 | Y | 17/08/2022 | 07/10/2022 | 51 |
| 32 | 020 | Y | 12/05/2020 | 02/07/2020 | 51 |
| 33 | 632 | Y | 26/07/2023 | 14/09/2023 | 50 |
| 34 | 201 | Y | 26/09/2022 | 15/11/2022 | 50 |
| 35 | 522 | Y | 12/09/2022 | 01/11/2022 | 50 |
| 36 | 197 | N | 04/10/2022 | 23/11/2022 | 50 |
| 37 | 469 | N | 09/06/2022 | 29/07/2022 | 50 |
| 38 | 151 | Y | 22/02/2023 | 11/04/2023 | 48 |
| 39 | 644 | Y | 22/08/2022 | 09/10/2022 | 48 |
| 40 | 365 | Y | 08/04/2022 | 26/05/2022 | 48 |
| 41 | 567 | Y | 28/07/2022 | 13/09/2022 | 47 |
| 42 | 472 | Y | 28/03/2022 | 14/05/2022 | 47 |
| 43 | 590 | Y | 07/04/2022 | 23/05/2022 | 46 |
| 44 | 051 | Y | 05/10/2022 | 20/11/2022 | 46 |
| 45 | 578 | Y | 25/11/2022 | 09/01/2023 | 45 |
| 46 | 611 | Y | 03/08/2022 | 16/09/2022 | 44 |
| 47 | 070 | N | 17/05/2022 | 29/06/2022 | 43 |
| 48 | 321 | N | 12/05/2022 | 24/06/2022 | 43 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies as the first notification of claim | First date claims pack sent | Days taken to send claims pack after claim notification |
|----|--------------------------|-----------------------------|--|-----------------------------|---|
| 49 | 658 | Y | 02/08/2023 | 14/09/2023 | 43 |
| 50 | 495 | Y | 01/12/2022 | 13/01/2023 | 43 |
| 51 | 653 | Y | 08/09/2022 | 20/10/2022 | 42 |
| 52 | 626 | Y | 14/10/2022 | 25/11/2022 | 42 |
| 53 | 655 | Y | 16/05/2023 | 27/06/2023 | 42 |
| 54 | 349 | Y | 17/05/2022 | 28/06/2022 | 42 |
| 55 | 159 | Y | 18/10/2022 | 29/11/2022 | 42 |
| 56 | 123 | Y | 18/09/2023 | 30/10/2023 | 42 |
| 57 | 366 | Y | 15/09/2022 | 26/10/2022 | 41 |
| 58 | 519 | Y | 16/06/2022 | 27/07/2022 | 41 |
| 59 | 213 | Y | 17/03/2022 | 26/04/2022 | 40 |
| 60 | 249 | Y | 08/06/2023 | 18/07/2023 | 40 |
| 61 | 511 | Y | 14/09/2022 | 24/10/2022 | 40 |
| 62 | 379 | Y | 13/10/2022 | 21/11/2022 | 39 |
| 63 | 263 | Y | 30/03/2022 | 07/05/2022 | 38 |
| 64 | 600 | Y | 17/10/2022 | 24/11/2022 | 38 |
| 65 | 355 | Y | 05/12/2022 | 12/01/2023 | 38 |
| 66 | 269 | Y | 24/05/2022 | 01/07/2022 | 38 |
| 67 | 571 | Y | 20/04/2023 | 28/05/2023 | 38 |
| 68 | 065 | Y | 11/04/2022 | 19/05/2022 | 38 |
| 69 | 436 | Y | 09/05/2022 | 15/06/2022 | 37 |
| 70 | 214 | Y | 13/06/2023 | 20/07/2023 | 37 |
| 71 | 124 | Y | 31/05/2022 | 07/07/2022 | 37 |
| 72 | 505 | Y | 09/08/2023 | 15/09/2023 | 37 |
| 73 | 732 | N | 16/01/2023 | 21/02/2023 | 36 |
| 74 | 575 | Y | 12/09/2022 | 18/10/2022 | 36 |
| 75 | 112 | Y | 20/09/2022 | 26/10/2022 | 36 |
| 76 | 221 | Y | 05/04/2022 | 11/05/2022 | 36 |
| 77 | 034 | Y | 12/09/2022 | 18/10/2022 | 36 |
| 78 | 381 | Y | 24/05/2022 | 29/06/2022 | 36 |
| 79 | 082 | N | 05/09/2022 | 10/10/2022 | 35 |
| 80 | 491 | Y | 25/05/2022 | 29/06/2022 | 35 |
| 81 | 262 | Y | 09/03/2023 | 13/04/2023 | 35 |
| 82 | 480 | Y | 23/05/2022 | 27/06/2022 | 35 |
| 83 | 176 | Y | 27/05/2022 | 01/07/2022 | 35 |
| 84 | 373 | Y | 04/07/2022 | 08/08/2022 | 35 |
| 85 | 284 | Y | 11/04/2023 | 15/05/2023 | 34 |
| 86 | 091 | Y | 30/06/2023 | 03/08/2023 | 34 |
| 87 | 650 | Y | 27/03/2023 | 30/04/2023 | 34 |
| 88 | 300 | Y | 26/08/2022 | 29/09/2022 | 34 |
| 89 | 705 | Y | 20/12/2022 | 23/01/2023 | 34 |
| 90 | 281 | Y | 21/12/2022 | 23/01/2023 | 33 |
| 91 | 190 | Y | 20/06/2022 | 23/07/2022 | 33 |
| 92 | 196 | N | 20/01/2020 | 21/02/2020 | 32 |
| 93 | 407 | Y | 01/08/2022 | 02/09/2022 | 32 |
| 94 | 199 | Y | 05/09/2022 | 07/10/2022 | 32 |
| 95 | 336 | Y | 23/03/2023 | 24/04/2023 | 32 |
| 96 | 557 | Y | 14/06/2022 | 16/07/2022 | 32 |
| 97 | 628 | N | 21/08/2023 | 21/09/2023 | 31 |
| 98 | 285 | N | 28/04/2023 | 29/05/2023 | 31 |
| 99 | 458 | Y | 28/03/2023 | 28/04/2023 | 31 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies as the first notification of claim | First date claims pack sent | Days taken to send claims pack after claim notification |
|-----|--------------------------|-----------------------------|--|-----------------------------|---|
| 100 | 585 | Y | 11/10/2022 | 11/11/2022 | 31 |
| 101 | 100 | Y | 04/07/2022 | 04/08/2022 | 31 |
| 102 | 296 | Y | 03/07/2023 | 03/08/2023 | 31 |
| 103 | 325 | Y | 22/05/2023 | 22/06/2023 | 31 |
| 104 | 484 | Y | 03/06/2022 | 04/07/2022 | 31 |
| 105 | 014 | Y | 29/08/2022 | 29/09/2022 | 31 |
| 106 | 103 | Y | 03/05/2022 | 03/06/2022 | 31 |
| 107 | 329 | Y | 23/05/2022 | 23/06/2022 | 31 |
| 108 | 514 | Y | 17/06/2022 | 18/07/2022 | 31 |
| 109 | 404 | Y | 13/06/2023 | 13/07/2023 | 30 |
| 110 | 234 | Y | 07/06/2022 | 07/07/2022 | 30 |
| 111 | 282 | Y | 21/12/2022 | 20/01/2023 | 30 |
| 112 | 592 | Y | 17/10/2023 | 16/11/2023 | 30 |
| 113 | 492 | Y | 18/05/2022 | 17/06/2022 | 30 |
| 114 | 613 | N | 20/10/2022 | 18/11/2022 | 29 |
| 115 | 437 | Y | 20/10/2022 | 18/11/2022 | 29 |
| 116 | 579 | Y | 21/06/2021 | 20/07/2021 | 29 |
| 117 | 280 | Y | 03/08/2022 | 01/09/2022 | 29 |
| 118 | 041 | Y | 30/05/2022 | 28/06/2022 | 29 |
| 119 | 465 | Y | 19/09/2022 | 18/10/2022 | 29 |
| 120 | 094 | Y | 18/08/2022 | 16/09/2022 | 29 |
| 121 | 370 | Y | 22/08/2022 | 20/09/2022 | 29 |
| 122 | 531 | Y | 31/08/2022 | 29/09/2022 | 29 |
| 123 | 394 | N | 26/08/2022 | 23/09/2022 | 28 |
| 124 | 649 | N | 13/06/2023 | 11/07/2023 | 28 |
| 125 | 583 | N | 01/05/2023 | 29/05/2023 | 28 |
| 126 | 526 | Y | 31/03/2023 | 28/04/2023 | 28 |
| 127 | 037 | Y | 03/03/2023 | 31/03/2023 | 28 |
| 128 | 090 | Y | 09/08/2022 | 06/09/2022 | 28 |
| 129 | 301 | Y | 23/08/2022 | 20/09/2022 | 28 |
| 130 | 068 | Y | 20/05/2022 | 17/06/2022 | 28 |
| 131 | 135 | Y | 19/09/2022 | 17/10/2022 | 28 |
| 132 | 111 | Y | 29/06/2022 | 27/07/2022 | 28 |
| 133 | 013 | Y | 19/05/2022 | 16/06/2022 | 28 |
| 134 | 537 | Y | 28/09/2022 | 26/10/2022 | 28 |
| 135 | 025 | Y | 18/05/2022 | 15/06/2022 | 28 |
| 136 | 086 | Y | 12/05/2022 | 09/06/2022 | 28 |
| 137 | 229 | N | 10/05/2023 | 06/06/2023 | 27 |
| 138 | 276 | Y | 21/04/2022 | 18/05/2022 | 27 |
| 139 | 133 | Y | 09/09/2022 | 06/10/2022 | 27 |
| 140 | 409 | Y | 18/05/2022 | 14/06/2022 | 27 |
| 141 | 181 | Y | 09/08/2022 | 05/09/2022 | 27 |
| 142 | 523 | Y | 01/07/2022 | 28/07/2022 | 27 |
| 143 | 570 | Y | 03/04/2023 | 30/04/2023 | 27 |
| 144 | 096 | Y | 02/06/2022 | 28/06/2022 | 26 |
| 145 | 438 | Y | 30/09/2022 | 26/10/2022 | 26 |
| 146 | 638 | Y | 23/12/2022 | 18/01/2023 | 26 |
| 147 | 486 | Y | 08/06/2022 | 04/07/2022 | 26 |
| 148 | 563 | Y | 31/03/2022 | 26/04/2022 | 26 |
| 149 | 378 | Y | 29/03/2023 | 24/04/2023 | 26 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies as the first notification of claim | First date claims pack sent | Days taken to send claims pack after claim notification |
|-----|--------------------------|-----------------------------|--|-----------------------------|---|
| 150 | 260 | Y | 23/06/2022 | 19/07/2022 | 26 |
| 151 | 640 | Y | 12/04/2022 | 07/05/2022 | 25 |
| 152 | 064 | Y | 03/06/2022 | 28/06/2022 | 25 |
| 153 | 059 | Y | 16/05/2022 | 10/06/2022 | 25 |
| 154 | 405 | Y | 18/07/2022 | 12/08/2022 | 25 |
| 155 | 194 | Y | 01/04/2022 | 26/04/2022 | 25 |
| 156 | 450 | N | 27/02/2023 | 23/03/2023 | 24 |
| 157 | 651 | Y | 04/04/2023 | 28/04/2023 | 24 |
| 158 | 095 | Y | 06/05/2022 | 30/05/2022 | 24 |
| 159 | 324 | Y | 05/06/2023 | 29/06/2023 | 24 |
| 160 | 595 | Y | 11/10/2022 | 03/11/2022 | 23 |
| 161 | 568 | Y | 15/05/2023 | 07/06/2023 | 23 |
| 162 | 340 | Y | 21/02/2023 | 16/03/2023 | 23 |
| 163 | 364 | Y | 13/09/2022 | 06/10/2022 | 23 |
| 164 | 432 | Y | 16/08/2022 | 08/09/2022 | 23 |
| 165 | 200 | Y | 21/03/2023 | 13/04/2023 | 23 |
| 166 | 098 | Y | 08/05/2023 | 31/05/2023 | 23 |
| 167 | 525 | Y | 06/05/2022 | 29/05/2022 | 23 |
| 168 | 529 | Y | 27/07/2022 | 19/08/2022 | 23 |
| 169 | 633 | N | 29/03/2023 | 20/04/2023 | 22 |
| 170 | 250 | N | 09/06/2022 | 01/07/2022 | 22 |
| 171 | 489 | Y | 20/09/2022 | 12/10/2022 | 22 |
| 172 | 587 | Y | 20/02/2023 | 14/03/2023 | 22 |
| 173 | 170 | Y | 24/04/2023 | 16/05/2023 | 22 |
| 174 | 462 | Y | 20/04/2023 | 12/05/2023 | 22 |
| 175 | 576 | Y | 01/08/2022 | 23/08/2022 | 22 |
| 176 | 599 | Y | 17/05/2022 | 08/06/2022 | 22 |
| 177 | 076 | Y | 29/09/2022 | 21/10/2022 | 22 |
| 178 | 273 | Y | 23/06/2022 | 15/07/2022 | 22 |
| 179 | 044 | Y | 24/12/2020 | 15/01/2021 | 22 |
| 180 | 243 | Y | 02/06/2022 | 23/06/2022 | 21 |
| 181 | 558 | Y | 27/07/2022 | 17/08/2022 | 21 |
| 182 | 114 | Y | 24/01/2022 | 14/02/2022 | 21 |
| 183 | 137 | Y | 06/06/2023 | 27/06/2023 | 21 |
| 184 | 502 | Y | 16/05/2023 | 06/06/2023 | 21 |
| 185 | 524 | Y | 19/04/2022 | 10/05/2022 | 21 |
| 186 | 629 | Y | 01/02/2022 | 22/02/2022 | 21 |
| 187 | 084 | Y | 26/05/2022 | 16/06/2022 | 21 |
| 188 | 045 | Y | 18/07/2022 | 08/08/2022 | 21 |
| 189 | 564 | Y | 29/03/2023 | 19/04/2023 | 21 |
| 190 | 311 | Y | 19/04/2023 | 10/05/2023 | 21 |
| 191 | 073 | Y | 11/05/2022 | 01/06/2022 | 21 |
| 192 | 347 | Y | 12/10/2022 | 02/11/2022 | 21 |
| 193 | 573 | Y | 08/11/2022 | 29/11/2022 | 21 |
| 194 | 072 | Y | 04/07/2022 | 25/07/2022 | 21 |
| 195 | 271 | Y | 16/08/2022 | 06/09/2022 | 21 |
| 196 | 239 | Y | 16/05/2023 | 05/06/2023 | 20 |
| 197 | 028 | Y | 05/07/2022 | 25/07/2022 | 20 |
| 198 | 164 | Y | 17/05/2023 | 06/06/2023 | 20 |
| 199 | 328 | Y | 23/08/2022 | 12/09/2022 | 20 |
| 200 | 530 | Y | 08/06/2022 | 28/06/2022 | 20 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies as the first notification of claim | First date claims pack sent | Days taken to send claims pack after claim notification |
|-----|--------------------------|-----------------------------|--|-----------------------------|---|
| 201 | 012 | Y | 14/03/2023 | 03/04/2023 | 20 |
| 202 | 634 | Y | 18/04/2023 | 08/05/2023 | 20 |
| 203 | 358 | Y | 26/05/2022 | 15/06/2022 | 20 |
| 204 | 017 | Y | 21/09/2022 | 11/10/2022 | 20 |
| 205 | 488 | Y | 24/02/2023 | 16/03/2023 | 20 |
| 206 | 602 | Y | 14/09/2022 | 04/10/2022 | 20 |
| 207 | 317 | Y | 10/05/2023 | 30/05/2023 | 20 |
| 208 | 131 | Y | 10/06/2022 | 30/06/2022 | 20 |
| 209 | 092 | Y | 07/10/2022 | 27/10/2022 | 20 |
| 210 | 554 | Y | 23/08/2022 | 12/09/2022 | 20 |
| 211 | 217 | Y | 12/11/2020 | 01/12/2020 | 19 |
| 212 | 247 | Y | 29/06/2022 | 18/07/2022 | 19 |
| 213 | 552 | Y | 02/05/2022 | 21/05/2022 | 19 |
| 214 | 021 | Y | 27/07/2022 | 15/08/2022 | 19 |
| 215 | 174 | Y | 09/05/2022 | 28/05/2022 | 19 |
| 216 | 019 | Y | 06/10/2022 | 25/10/2022 | 19 |
| 217 | 031 | Y | 15/06/2022 | 04/07/2022 | 19 |
| 218 | 423 | Y | 08/09/2022 | 27/09/2022 | 19 |
| 219 | 393 | Y | 17/09/2021 | 05/10/2021 | 18 |
| 220 | 648 | N | 22/08/2022 | 09/09/2022 | 18 |
| 221 | 303 | Y | 29/07/2022 | 16/08/2022 | 18 |
| 222 | 501 | Y | 19/08/2022 | 06/09/2022 | 18 |
| 223 | 581 | Y | 14/07/2022 | 01/08/2022 | 18 |
| 224 | 430 | Y | 01/08/2022 | 19/08/2022 | 18 |
| 225 | 248 | Y | 25/08/2022 | 12/09/2022 | 18 |
| 226 | 744 | N | 26/07/2022 | 12/08/2022 | 17 |
| 227 | 443 | Y | 20/12/2021 | 06/01/2022 | 17 |
| 228 | 654 | Y | 09/09/2022 | 26/09/2022 | 17 |
| 229 | 016 | Y | 18/01/2022 | 04/02/2022 | 17 |
| 230 | 215 | Y | 01/05/2023 | 18/05/2023 | 17 |
| 231 | 652 | Y | 13/06/2023 | 30/06/2023 | 17 |
| 232 | 006 | Y | 14/06/2022 | 01/07/2022 | 17 |
| 233 | 171 | Y | 15/07/2022 | 01/08/2022 | 17 |
| 234 | 356 | Y | 31/05/2023 | 16/06/2023 | 16 |
| 235 | 452 | Y | 20/09/2023 | 06/10/2023 | 16 |
| 236 | 656 | Y | 11/12/2023 | 27/12/2023 | 16 |
| 237 | 240 | Y | 19/12/2023 | 04/01/2024 | 16 |
| 238 | 125 | Y | 10/05/2022 | 26/05/2022 | 16 |
| 239 | 485 | N | 02/11/2022 | 18/11/2022 | 16 |
| 240 | 266 | Y | 07/07/2022 | 22/07/2022 | 15 |
| 241 | 624 | Y | 27/06/2022 | 12/07/2022 | 15 |
| 242 | 635 | Y | 29/06/2022 | 14/07/2022 | 15 |
| 243 | 528 | Y | 29/06/2022 | 14/07/2022 | 15 |
| 244 | 231 | Y | 05/07/2022 | 20/07/2022 | 15 |
| 245 | 580 | Y | 07/09/2021 | 22/09/2021 | 15 |
| 246 | 077 | Y | 04/05/2022 | 19/05/2022 | 15 |
| 247 | 543 | Y | 15/09/2021 | 30/09/2021 | 15 |
| 248 | 608 | Y | 06/07/2022 | 21/07/2022 | 15 |
| 249 | 406 | Y | 29/06/2022 | 14/07/2022 | 15 |
| 250 | 075 | Y | 21/04/2022 | 06/05/2022 | 15 |
| 251 | 104 | Y | 20/06/2022 | 05/07/2022 | 15 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies as the first notification of claim | First date claims pack sent | Days taken to send claims pack after claim notification |
|------------|--------------------------|-----------------------------|--|-----------------------------|---|
| 252 | 223 | Y | 13/10/2020 | 28/10/2020 | 15 |
| 253 | 245 | Y | 14/07/2022 | 29/07/2022 | 15 |
| 254 | 047 | N | 03/03/2022 | 18/03/2022 | 15 |

Schedule 2 – Delay in reviewing recommendation

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies that it received a recommendation on claim | Date AustralianSuper identifies that it reviewed a recommendation | Days taken to review recommendation |
|----|--------------------------|-----------------------------|--|---|-------------------------------------|
| 1 | 225 | N | 10/05/2022 | 10/08/2022 | 92 |
| 2 | 291 | N | 29/05/2020 | 27/08/2020 | 90 |
| 3 | 586 | N | 03/12/2021 | 01/03/2022 | 88 |
| 4 | 637 | N | 08/09/2023 | 20/11/2023 | 73 |
| 5 | 075 | Y | 16/03/2023 | 17/05/2023 | 62 |
| 6 | 126 | N | 08/11/2022 | 09/01/2023 | 62 |
| 7 | 394 | N | 17/07/2023 | 17/09/2023 | 62 |
| 8 | 032 | N | 16/11/2022 | 17/01/2023 | 62 |
| 9 | 357 | N | 04/07/2023 | 28/08/2023 | 55 |
| 10 | 487 | N | 03/08/2023 | 26/09/2023 | 54 |
| 11 | 030 | N | 23/10/2021 | 15/12/2021 | 53 |
| 12 | 155 | N | 11/03/2021 | 29/04/2021 | 49 |
| 13 | 138 | N | 20/06/2023 | 07/08/2023 | 48 |
| 14 | 485 | N | 15/08/2023 | 30/09/2023 | 46 |
| 15 | 615 | N | 15/08/2023 | 30/09/2023 | 46 |
| 16 | 616 | N | 25/05/2022 | 10/07/2022 | 46 |
| 17 | 332 | N | 10/07/2023 | 25/08/2023 | 46 |
| 18 | 490 | Y | 07/08/2023 | 20/09/2023 | 44 |
| 19 | 142 | N | 11/09/2023 | 25/10/2023 | 44 |
| 20 | 195 | Y | 05/10/2021 | 17/11/2021 | 43 |
| 21 | 303 | Y | 11/04/2023 | 23/05/2023 | 42 |
| 22 | 065 | Y | 08/11/2022 | 16/12/2022 | 38 |
| 23 | 536 | Y | 28/06/2023 | 04/08/2023 | 37 |
| 24 | 101 | Y | 03/04/2023 | 09/05/2023 | 36 |
| 25 | 146 | Y | 04/04/2023 | 09/05/2023 | 35 |
| 26 | 038 | Y | 13/04/2023 | 18/05/2023 | 35 |
| 27 | 025 | Y | 30/03/2023 | 03/05/2023 | 34 |
| 28 | 096 | Y | 30/03/2023 | 03/05/2023 | 34 |
| 29 | 130 | Y | 06/04/2023 | 10/05/2023 | 34 |
| 30 | 224 | Y | 29/03/2023 | 02/05/2023 | 34 |
| 31 | 011 | Y | 30/03/2023 | 03/05/2023 | 34 |
| 32 | 581 | Y | 14/04/2023 | 17/05/2023 | 33 |
| 33 | 619 | Y | 28/08/2023 | 30/09/2023 | 33 |
| 34 | 518 | Y | 31/03/2023 | 03/05/2023 | 33 |
| 35 | 032 | N | 05/08/2022 | 07/09/2022 | 33 |
| 36 | 700 | Y | 20/04/2023 | 22/05/2023 | 32 |
| 37 | 198 | Y | 20/04/2023 | 22/05/2023 | 32 |
| 38 | 021 | Y | 20/04/2023 | 22/05/2023 | 32 |
| 39 | 183 | Y | 24/08/2023 | 25/09/2023 | 32 |
| 40 | 095 | Y | 23/08/2022 | 23/09/2022 | 31 |
| 41 | 506 | Y | 27/03/2023 | 27/04/2023 | 31 |
| 42 | 639 | Y | 03/04/2023 | 04/05/2023 | 31 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies that it received a recommendation on claim | Date AustralianSuper identifies that it reviewed a recommendation | Days taken to review recommendation |
|----|--------------------------|-----------------------------|--|---|-------------------------------------|
| 43 | 679 | Y | 03/04/2023 | 04/05/2023 | 31 |
| 44 | 697 | Y | 10/04/2023 | 11/05/2023 | 31 |
| 45 | 642 | Y | 18/04/2023 | 19/05/2023 | 31 |
| 46 | 055 | Y | 21/04/2023 | 22/05/2023 | 31 |
| 47 | 252 | Y | 21/04/2023 | 22/05/2023 | 31 |
| 48 | 611 | Y | 05/12/2022 | 04/01/2023 | 30 |
| 49 | 600 | Y | 27/03/2023 | 26/04/2023 | 30 |
| 50 | 303 | Y | 11/04/2023 | 11/05/2023 | 30 |
| 51 | 194 | Y | 19/04/2023 | 19/05/2023 | 30 |
| 52 | 082 | N | 05/04/2023 | 05/05/2023 | 30 |
| 53 | 289 | Y | 31/01/2022 | 01/03/2022 | 29 |
| 54 | 629 | Y | 08/09/2022 | 07/10/2022 | 29 |
| 55 | 206 | Y | 11/04/2023 | 10/05/2023 | 29 |
| 56 | 405 | Y | 20/04/2023 | 19/05/2023 | 29 |
| 57 | 513 | Y | 09/08/2023 | 07/09/2023 | 29 |
| 58 | 290 | Y | 18/09/2023 | 17/10/2023 | 29 |
| 59 | 097 | Y | 24/04/2023 | 23/05/2023 | 29 |
| 60 | 306 | Y | 24/04/2023 | 23/05/2023 | 29 |
| 61 | 232 | N | 12/08/2020 | 10/09/2020 | 29 |
| 62 | 363 | N | 17/12/2019 | 15/01/2020 | 29 |
| 63 | 398 | N | 23/12/2020 | 21/01/2021 | 29 |
| 64 | 672 | Y | 08/08/2023 | 05/09/2023 | 28 |
| 65 | 338 | N | 19/12/2019 | 16/01/2020 | 28 |
| 66 | 343 | N | 03/02/2020 | 02/03/2020 | 28 |
| 67 | 207 | Y | 11/05/2021 | 07/06/2021 | 27 |
| 68 | 135 | Y | 21/03/2023 | 17/04/2023 | 27 |
| 69 | 501 | Y | 26/04/2023 | 23/05/2023 | 27 |
| 70 | 602 | Y | 26/04/2023 | 23/05/2023 | 27 |
| 71 | 226 | Y | 12/07/2023 | 08/08/2023 | 27 |
| 72 | 525 | Y | 23/03/2023 | 19/04/2023 | 27 |
| 73 | 486 | Y | 27/01/2023 | 22/02/2023 | 26 |
| 74 | 211 | Y | 24/03/2023 | 19/04/2023 | 26 |
| 75 | 411 | Y | 28/04/2023 | 24/05/2023 | 26 |
| 76 | 604 | Y | 28/04/2023 | 24/05/2023 | 26 |
| 77 | 463 | Y | 04/02/2022 | 01/03/2022 | 25 |
| 78 | 551 | Y | 23/03/2023 | 17/04/2023 | 25 |
| 79 | 221 | Y | 24/03/2023 | 18/04/2023 | 25 |
| 80 | 682 | Y | 28/04/2023 | 23/05/2023 | 25 |
| 81 | 419 | Y | 28/04/2023 | 23/05/2023 | 25 |
| 82 | 312 | Y | 12/04/2022 | 07/05/2022 | 25 |
| 83 | 704 | Y | 19/09/2022 | 13/10/2022 | 24 |
| 84 | 662 | Y | 20/09/2022 | 14/10/2022 | 24 |
| 85 | 269 | Y | 20/09/2022 | 14/10/2022 | 24 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies that it received a recommendation on claim | Date AustralianSuper identifies that it reviewed a recommendation | Days taken to review recommendation |
|-----|--------------------------|-----------------------------|--|---|-------------------------------------|
| 86 | 470 | Y | 10/10/2022 | 03/11/2022 | 24 |
| 87 | 627 | Y | 10/10/2022 | 03/11/2022 | 24 |
| 88 | 314 | Y | 24/04/2023 | 18/05/2023 | 24 |
| 89 | 684 | Y | 25/08/2023 | 18/09/2023 | 24 |
| 90 | 667 | Y | 16/10/2023 | 09/11/2023 | 24 |
| 91 | 447 | N | 24/12/2019 | 17/01/2020 | 24 |
| 92 | 344 | N | 10/12/2019 | 03/01/2020 | 24 |
| 93 | 610 | Y | 09/06/2022 | 02/07/2022 | 23 |
| 94 | 064 | Y | 05/09/2022 | 28/09/2022 | 23 |
| 95 | 706 | Y | 19/09/2022 | 12/10/2022 | 23 |
| 96 | 538 | Y | 20/09/2022 | 13/10/2022 | 23 |
| 97 | 657 | Y | 27/03/2023 | 19/04/2023 | 23 |
| 98 | 333 | Y | 01/05/2023 | 24/05/2023 | 23 |
| 99 | 099 | Y | 11/12/2019 | 03/01/2020 | 23 |
| 100 | 539 | Y | 27/03/2023 | 19/04/2023 | 23 |
| 101 | 283 | Y | 05/02/2020 | 27/02/2020 | 22 |
| 102 | 702 | Y | 05/09/2022 | 27/09/2022 | 22 |
| 103 | 590 | Y | 06/09/2022 | 28/09/2022 | 22 |
| 104 | 163 | Y | 20/03/2023 | 11/04/2023 | 22 |
| 105 | 537 | Y | 02/05/2023 | 24/05/2023 | 22 |
| 106 | 589 | Y | 19/09/2023 | 11/10/2023 | 22 |
| 107 | 550 | Y | 02/05/2023 | 24/05/2023 | 22 |
| 108 | 353 | Y | 03/02/2020 | 24/02/2020 | 21 |
| 109 | 709 | Y | 07/09/2022 | 28/09/2022 | 21 |
| 110 | 041 | Y | 12/09/2022 | 03/10/2022 | 21 |
| 111 | 555 | Y | 14/09/2022 | 05/10/2022 | 21 |
| 112 | 062 | Y | 15/09/2022 | 06/10/2022 | 21 |
| 113 | 601 | Y | 16/09/2022 | 07/10/2022 | 21 |
| 114 | 248 | Y | 23/09/2022 | 14/10/2022 | 21 |
| 115 | 484 | Y | 03/10/2022 | 24/10/2022 | 21 |
| 116 | 015 | Y | 04/10/2022 | 25/10/2022 | 21 |
| 117 | 084 | Y | 13/10/2022 | 03/11/2022 | 21 |
| 118 | 063 | Y | 18/10/2022 | 08/11/2022 | 21 |
| 119 | 535 | Y | 22/03/2023 | 12/04/2023 | 21 |
| 120 | 597 | Y | 04/05/2023 | 25/05/2023 | 21 |
| 121 | 671 | Y | 07/08/2023 | 28/08/2023 | 21 |
| 122 | 067 | N | 22/01/2020 | 12/02/2020 | 21 |
| 123 | 237 | N | 06/02/2020 | 27/02/2020 | 21 |
| 124 | 024 | N | 03/02/2020 | 24/02/2020 | 21 |
| 125 | 527 | Y | 24/08/2022 | 13/09/2022 | 20 |
| 126 | 191 | Y | 13/09/2022 | 03/10/2022 | 20 |
| 127 | 335 | Y | 28/09/2022 | 18/10/2022 | 20 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies that it received a recommendation on claim | Date AustralianSuper identifies that it reviewed a recommendation | Days taken to review recommendation |
|-----|--------------------------|-----------------------------|--|---|-------------------------------------|
| 128 | 389 | Y | 28/09/2022 | 18/10/2022 | 20 |
| 129 | 442 | Y | 28/09/2022 | 18/10/2022 | 20 |
| 130 | 553 | Y | 30/09/2022 | 20/10/2022 | 20 |
| 131 | 158 | Y | 05/10/2022 | 25/10/2022 | 20 |
| 132 | 558 | Y | 19/10/2022 | 08/11/2022 | 20 |
| 133 | 624 | Y | 03/11/2022 | 23/11/2022 | 20 |
| 134 | 233 | Y | 30/03/2023 | 19/04/2023 | 20 |
| 135 | 651 | Y | 04/08/2023 | 24/08/2023 | 20 |
| 136 | 409 | Y | 13/09/2022 | 03/10/2022 | 20 |
| 137 | 150 | N | 05/02/2020 | 25/02/2020 | 20 |
| 138 | 100 | Y | 27/10/2022 | 15/11/2022 | 19 |
| 139 | 507 | Y | 06/09/2023 | 25/09/2023 | 19 |
| 140 | 424 | Y | 02/03/2023 | 21/03/2023 | 19 |
| 141 | 562 | Y | 07/04/2023 | 26/04/2023 | 19 |
| 142 | 141 | N | 19/08/2020 | 07/09/2020 | 19 |
| 143 | 257 | N | 19/08/2020 | 07/09/2020 | 19 |
| 144 | 399 | Y | 05/05/2023 | 23/05/2023 | 18 |
| 145 | 324 | Y | 04/08/2023 | 22/08/2023 | 18 |
| 146 | 474 | Y | 07/03/2022 | 25/03/2022 | 18 |
| 147 | 272 | Y | 02/03/2023 | 20/03/2023 | 18 |
| 148 | 329 | Y | 12/09/2022 | 30/09/2022 | 18 |
| 149 | 236 | Y | 12/09/2023 | 30/09/2023 | 18 |
| 150 | 227 | N | 27/06/2022 | 15/07/2022 | 18 |
| 151 | 016 | Y | 13/05/2022 | 30/05/2022 | 17 |
| 152 | 563 | Y | 15/07/2022 | 01/08/2022 | 17 |
| 153 | 730 | Y | 15/07/2022 | 01/08/2022 | 17 |
| 154 | 599 | Y | 22/08/2022 | 08/09/2022 | 17 |
| 155 | 095 | Y | 23/08/2022 | 09/09/2022 | 17 |
| 156 | 244 | Y | 23/08/2022 | 09/09/2022 | 17 |
| 157 | 640 | Y | 29/08/2022 | 15/09/2022 | 17 |
| 158 | 263 | Y | 03/10/2022 | 20/10/2022 | 17 |
| 159 | 491 | Y | 04/10/2022 | 21/10/2022 | 17 |
| 160 | 273 | Y | 24/04/2023 | 11/05/2023 | 17 |
| 161 | 103 | Y | 05/05/2023 | 22/05/2023 | 17 |
| 162 | 239 | Y | 22/12/2023 | 08/01/2024 | 17 |
| 163 | 476 | Y | 01/05/2023 | 18/05/2023 | 17 |
| 164 | 557 | Y | 03/10/2022 | 20/10/2022 | 17 |
| 165 | 730 | Y | 15/07/2022 | 01/08/2022 | 17 |
| 166 | 080 | N | 02/06/2020 | 19/06/2020 | 17 |
| 167 | 362 | Y | 12/04/2022 | 28/04/2022 | 16 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper identifies that it received a recommendation on claim | Date AustralianSuper identifies that it reviewed a recommendation | Days taken to review recommendation |
|-----|--------------------------|-----------------------------|--|---|-------------------------------------|
| 168 | 607 | Y | 18/07/2022 | 03/08/2022 | 16 |
| 169 | 254 | Y | 25/07/2022 | 10/08/2022 | 16 |
| 170 | 497 | Y | 25/07/2022 | 10/08/2022 | 16 |
| 171 | 699 | Y | 18/10/2022 | 03/11/2022 | 16 |
| 172 | 689 | Y | 31/10/2022 | 16/11/2022 | 16 |
| 173 | 435 | Y | 06/03/2023 | 22/03/2023 | 16 |
| 174 | 676 | Y | 06/03/2023 | 22/03/2023 | 16 |
| 175 | 493 | Y | 17/08/2022 | 02/09/2022 | 16 |
| 176 | 147 | N | 13/01/2020 | 29/01/2020 | 16 |
| 177 | 144 | Y | 23/01/2020 | 07/02/2020 | 15 |
| 178 | 412 | Y | 19/07/2022 | 03/08/2022 | 15 |
| 179 | 136 | Y | 20/07/2022 | 04/08/2022 | 15 |
| 180 | 204 | Y | 26/07/2022 | 10/08/2022 | 15 |
| 181 | 122 | Y | 28/07/2022 | 12/08/2022 | 15 |
| 182 | 153 | Y | 11/10/2022 | 26/10/2022 | 15 |
| 183 | 432 | Y | 31/10/2022 | 15/11/2022 | 15 |
| 184 | 585 | Y | 14/02/2023 | 01/03/2023 | 15 |
| 185 | 603 | Y | 27/02/2023 | 14/03/2023 | 15 |
| 186 | 003 | Y | 27/02/2023 | 14/03/2023 | 15 |
| 187 | 172 | Y | 28/02/2023 | 15/03/2023 | 15 |
| 188 | 396 | Y | 01/03/2023 | 16/03/2023 | 15 |
| 189 | 674 | Y | 07/03/2023 | 22/03/2023 | 15 |
| 190 | 622 | Y | 08/03/2023 | 23/03/2023 | 15 |
| 191 | 596 | Y | 08/03/2023 | 23/03/2023 | 15 |
| 192 | 281 | Y | 21/03/2023 | 05/04/2023 | 15 |
| 193 | 605 | Y | 05/04/2023 | 20/04/2023 | 15 |
| 194 | 264 | Y | 01/09/2023 | 16/09/2023 | 15 |
| 195 | 171 | Y | 24/09/2023 | 09/10/2023 | 15 |
| 196 | 459 | Y | 21/12/2023 | 05/01/2024 | 15 |
| 197 | 121 | Y | 21/12/2023 | 05/01/2024 | 15 |
| 198 | 379 | Y | 08/03/2023 | 23/03/2023 | 15 |
| 199 | 086 | Y | 01/03/2023 | 16/03/2023 | 15 |
| 200 | 393 | Y | 19/07/2022 | 03/08/2022 | 15 |
| 201 | 224 | Y | 25/07/2023 | 09/08/2023 | 15 |
| 202 | 102 | Y | 19/11/2019 | 04/12/2019 | 15 |
| 203 | 499 | Y | 02/03/2022 | 17/03/2022 | 15 |
| 204 | 413 | Y | 06/03/2023 | 21/03/2023 | 15 |
| 205 | 440 | N | 15/01/2020 | 30/01/2020 | 15 |
| 206 | 473 | N | 12/02/2020 | 27/02/2020 | 15 |
| 207 | 008 | N | 05/12/2019 | 20/12/2019 | 15 |

Schedule 3 – Delay in notifying claimant of determination

| | Unique member Identifier | BDBN and no objection [Y/N] | Date of AustralianSuper determination | Date claimant notified of determination | Days taken to notify claimant of determination |
|----|--------------------------|-----------------------------|---------------------------------------|---|--|
| 1 | 009 | Y | 12/08/2022 | 15/08/2023 | 368 |
| 2 | 204 | Y | 10/08/2022 | 26/04/2023 | 259 |
| 3 | 060 | Y | 15/08/2022 | 20/04/2023 | 248 |
| 4 | 251 | Y | 30/08/2022 | 04/05/2023 | 247 |
| 5 | 073 | Y | 29/11/2022 | 20/07/2023 | 233 |
| 6 | 065 | Y | 16/12/2022 | 30/06/2023 | 196 |
| 7 | 752 | Y | 19/05/2023 | 29/11/2023 | 194 |
| 8 | 715 | Y | 28/11/2022 | 02/06/2023 | 186 |
| 9 | 172 | Y | 15/03/2023 | 07/09/2023 | 176 |
| 10 | 544 | Y | 31/05/2023 | 17/11/2023 | 170 |
| 11 | 528 | Y | 17/11/2022 | 23/04/2023 | 157 |
| 12 | 177 | Y | 20/10/2021 | 10/03/2022 | 141 |
| 13 | 431 | Y | 16/11/2021 | 05/04/2022 | 140 |
| 14 | 515 | Y | 26/05/2022 | 11/10/2022 | 138 |
| 15 | 407 | Y | 20/01/2023 | 01/06/2023 | 132 |
| 16 | 534 | Y | 21/07/2023 | 29/11/2023 | 131 |
| 17 | 558 | Y | 08/11/2022 | 09/03/2023 | 121 |
| 18 | 567 | Y | 31/05/2023 | 27/09/2023 | 119 |
| 19 | 399 | Y | 23/05/2023 | 18/09/2023 | 118 |
| 20 | 157 | Y | 22/11/2022 | 13/03/2023 | 111 |
| 21 | 713 | Y | 22/12/2022 | 12/04/2023 | 111 |
| 22 | 222 | Y | 13/02/2023 | 02/06/2023 | 109 |
| 23 | 187 | Y | 17/01/2024 | 02/05/2024 | 106 |
| 24 | 624 | Y | 23/11/2022 | 07/03/2023 | 104 |
| 25 | 439 | N | 14/01/2021 | 26/04/2021 | 102 |
| 26 | 465 | Y | 21/02/2023 | 01/06/2023 | 100 |
| 27 | 279 | Y | 05/04/2022 | 13/07/2022 | 99 |
| 28 | 330 | Y | 23/02/2023 | 02/06/2023 | 99 |
| 29 | 234 | Y | 22/12/2022 | 29/03/2023 | 97 |
| 30 | 339 | Y | 25/06/2022 | 28/09/2022 | 95 |
| 31 | 042 | Y | 15/04/2022 | 17/07/2022 | 93 |
| 32 | 534 | Y | 02/08/2023 | 01/11/2023 | 91 |
| 33 | 517 | Y | 03/12/2021 | 04/03/2022 | 91 |
| 34 | 104 | Y | 07/02/2023 | 09/05/2023 | 91 |
| 35 | 384 | Y | 11/03/2021 | 09/06/2021 | 90 |
| 36 | 154 | Y | 19/08/2022 | 16/11/2022 | 89 |
| 37 | 297 | Y | 16/06/2022 | 12/09/2022 | 88 |
| 38 | 486 | Y | 22/02/2023 | 19/05/2023 | 86 |
| 39 | 320 | Y | 09/05/2023 | 02/08/2023 | 85 |
| 40 | 489 | Y | 29/11/2022 | 21/02/2023 | 84 |
| 41 | 014 | Y | 14/06/2023 | 06/09/2023 | 84 |
| 42 | 479 | Y | 10/08/2022 | 02/11/2022 | 84 |
| 43 | 351 | Y | 25/05/2023 | 16/08/2023 | 83 |
| 44 | 704 | Y | 13/10/2022 | 04/01/2023 | 83 |
| 45 | 561 | Y | 03/05/2022 | 25/07/2022 | 83 |
| 46 | 593 | Y | 26/11/2021 | 17/02/2022 | 83 |
| 47 | 369 | Y | 07/04/2022 | 28/06/2022 | 82 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date of AustralianSuper determination | Date claimant notified of determination | Days taken to notify claimant of determination |
|----|--------------------------|-----------------------------|---------------------------------------|---|--|
| 48 | 685 | Y | 15/12/2022 | 07/03/2023 | 82 |
| 49 | 255 | Y | 15/04/2022 | 06/07/2022 | 82 |
| 50 | 312 | Y | 07/05/2022 | 25/07/2022 | 79 |
| 51 | 074 | Y | 14/06/2022 | 31/08/2022 | 78 |
| 52 | 243 | Y | 16/12/2022 | 03/03/2023 | 77 |
| 53 | 521 | Y | 07/12/2021 | 21/02/2022 | 76 |
| 54 | 387 | Y | 12/08/2022 | 25/10/2022 | 74 |
| 55 | 670 | Y | 21/05/2022 | 02/08/2022 | 73 |
| 56 | 057 | Y | 21/05/2022 | 02/08/2022 | 73 |
| 57 | 663 | Y | 16/11/2021 | 28/01/2022 | 73 |
| 58 | 410 | Y | 11/01/2023 | 24/03/2023 | 72 |
| 59 | 556 | Y | 27/05/2022 | 06/08/2022 | 71 |
| 60 | 716 | Y | 28/03/2022 | 07/06/2022 | 71 |
| 61 | 707 | Y | 15/08/2022 | 25/10/2022 | 71 |
| 62 | 078 | Y | 24/06/2022 | 02/09/2022 | 70 |
| 63 | 425 | Y | 08/05/2023 | 17/07/2023 | 70 |
| 64 | 289 | Y | 01/03/2022 | 10/05/2022 | 70 |
| 65 | 131 | Y | 20/09/2022 | 29/11/2022 | 70 |
| 66 | 687 | Y | 24/05/2022 | 02/08/2022 | 70 |
| 67 | 412 | Y | 04/08/2022 | 13/10/2022 | 70 |
| 68 | 540 | Y | 16/09/2022 | 24/11/2022 | 69 |
| 69 | 271 | Y | 29/12/2022 | 08/03/2023 | 69 |
| 70 | 472 | Y | 11/08/2022 | 19/10/2022 | 69 |
| 71 | 319 | N | 23/01/2020 | 31/03/2020 | 68 |
| 72 | 496 | Y | 04/07/2022 | 09/09/2022 | 67 |
| 73 | 145 | Y | 25/06/2023 | 30/08/2023 | 66 |
| 74 | 390 | Y | 19/11/2021 | 24/01/2022 | 66 |
| 75 | 477 | Y | 25/06/2022 | 30/08/2022 | 66 |
| 76 | 113 | Y | 28/07/2022 | 01/10/2022 | 65 |
| 77 | 569 | Y | 23/02/2021 | 29/04/2021 | 65 |
| 78 | 224 | Y | 08/09/2023 | 11/11/2023 | 64 |
| 79 | 115 | Y | 10/07/2022 | 12/09/2022 | 64 |
| 80 | 698 | Y | 11/07/2022 | 13/09/2022 | 64 |
| 81 | 084 | Y | 03/11/2022 | 06/01/2023 | 64 |
| 82 | 730 | Y | 01/08/2022 | 03/10/2022 | 63 |
| 83 | 348 | Y | 12/07/2022 | 13/09/2022 | 63 |
| 84 | 345 | Y | 15/05/2023 | 17/07/2023 | 63 |
| 85 | 143 | Y | 24/08/2022 | 26/10/2022 | 63 |
| 86 | 228 | Y | 12/07/2022 | 12/09/2022 | 62 |
| 87 | 504 | Y | 07/07/2022 | 06/09/2022 | 61 |
| 88 | 474 | Y | 25/03/2022 | 25/05/2022 | 61 |
| 89 | 293 | Y | 18/10/2021 | 17/12/2021 | 60 |
| 90 | 563 | Y | 01/08/2022 | 30/09/2022 | 60 |
| 91 | 703 | Y | 26/03/2021 | 25/05/2021 | 60 |
| 92 | 118 | Y | 07/04/2022 | 06/06/2022 | 60 |
| 93 | 026 | N | 13/07/2020 | 11/09/2020 | 60 |
| 94 | 430 | Y | 03/02/2023 | 03/04/2023 | 59 |
| 95 | 501 | Y | 23/05/2023 | 21/07/2023 | 59 |
| 96 | 101 | Y | 09/05/2023 | 07/07/2023 | 59 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date of AustralianSuper determination | Date claimant notified of determination | Days taken to notify claimant of determination |
|-----|--------------------------|-----------------------------|---------------------------------------|---|--|
| 97 | 268 | Y | 28/04/2021 | 25/06/2021 | 58 |
| 98 | 064 | Y | 28/09/2022 | 24/11/2022 | 57 |
| 99 | 702 | Y | 28/09/2022 | 24/11/2022 | 57 |
| 100 | 699 | Y | 03/11/2022 | 29/12/2022 | 56 |
| 101 | 443 | Y | 02/05/2022 | 27/06/2022 | 56 |
| 102 | 342 | Y | 30/11/2021 | 25/01/2022 | 56 |
| 103 | 191 | Y | 03/10/2022 | 28/11/2022 | 56 |
| 104 | 471 | Y | 23/02/2022 | 19/04/2022 | 55 |
| 105 | 373 | Y | 01/12/2022 | 24/01/2023 | 54 |
| 106 | 680 | Y | 24/03/2022 | 16/05/2022 | 53 |
| 107 | 710 | Y | 30/04/2022 | 22/06/2022 | 53 |
| 108 | 572 | Y | 03/10/2022 | 24/11/2022 | 52 |
| 109 | 002 | Y | 07/06/2023 | 28/07/2023 | 51 |
| 110 | 216 | Y | 26/07/2021 | 15/09/2021 | 51 |
| 111 | 577 | Y | 28/09/2023 | 17/11/2023 | 50 |
| 112 | 694 | Y | 18/08/2022 | 07/10/2022 | 50 |
| 113 | 463 | Y | 01/03/2022 | 19/04/2022 | 49 |
| 114 | 263 | Y | 20/10/2023 | 08/12/2023 | 49 |
| 115 | 020 | Y | 26/08/2020 | 13/10/2020 | 48 |
| 116 | 256 | Y | 20/06/2023 | 07/08/2023 | 48 |
| 117 | 282 | Y | 18/05/2023 | 05/07/2023 | 48 |
| 118 | 370 | Y | 31/05/2023 | 17/07/2023 | 47 |
| 119 | 075 | Y | 17/05/2023 | 03/07/2023 | 47 |
| 120 | 651 | Y | 24/08/2023 | 10/10/2023 | 47 |
| 121 | 094 | Y | 08/12/2022 | 23/01/2023 | 46 |
| 122 | 272 | Y | 20/03/2023 | 05/05/2023 | 46 |
| 123 | 413 | Y | 21/03/2023 | 05/05/2023 | 45 |
| 124 | 246 | Y | 14/05/2023 | 28/06/2023 | 45 |
| 125 | 212 | Y | 30/01/2023 | 16/03/2023 | 45 |
| 126 | 668 | Y | 27/07/2022 | 09/09/2022 | 44 |
| 127 | 198 | Y | 22/05/2023 | 05/07/2023 | 44 |
| 128 | 220 | Y | 30/03/2022 | 13/05/2022 | 44 |
| 129 | 058 | Y | 28/01/2021 | 12/03/2021 | 43 |
| 130 | 292 | Y | 12/06/2022 | 25/07/2022 | 43 |
| 131 | 635 | Y | 22/11/2022 | 04/01/2023 | 43 |
| 132 | 538 | Y | 13/10/2022 | 25/11/2022 | 43 |
| 133 | 371 | Y | 12/05/2023 | 24/06/2023 | 43 |
| 134 | 606 | Y | 01/11/2023 | 14/12/2023 | 43 |
| 135 | 003 | Y | 14/03/2023 | 26/04/2023 | 43 |
| 136 | 182 | Y | 24/08/2021 | 06/10/2021 | 43 |
| 137 | 079 | Y | 13/01/2022 | 24/02/2022 | 42 |
| 138 | 241 | Y | 02/03/2021 | 12/04/2021 | 41 |
| 139 | 642 | Y | 20/10/2023 | 30/11/2023 | 41 |
| 140 | 607 | Y | 03/08/2022 | 12/09/2022 | 40 |
| 141 | 553 | Y | 20/10/2022 | 29/11/2022 | 40 |
| 142 | 420 | Y | 13/02/2023 | 24/03/2023 | 39 |
| 143 | 323 | Y | 05/03/2021 | 12/04/2021 | 38 |
| 144 | 221 | Y | 18/04/2023 | 26/05/2023 | 38 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date of AustralianSuper determination | Date claimant notified of determination | Days taken to notify claimant of determination |
|-----|--------------------------|-----------------------------|---------------------------------------|---|--|
| 145 | 072 | Y | 22/11/2022 | 30/12/2022 | 38 |
| 146 | 691 | Y | 24/06/2024 | 01/08/2024 | 38 |
| 147 | 549 | Y | 22/05/2023 | 29/06/2023 | 38 |
| 148 | 542 | Y | 11/10/2023 | 17/11/2023 | 37 |
| 149 | 508 | Y | 12/10/2021 | 18/11/2021 | 37 |
| 150 | 374 | Y | 05/06/2023 | 12/07/2023 | 37 |
| 151 | 331 | Y | 29/11/2022 | 03/01/2023 | 35 |
| 152 | 106 | Y | 17/04/2024 | 22/05/2024 | 35 |
| 153 | 302 | Y | 29/05/2024 | 03/07/2024 | 35 |
| 154 | 566 | Y | 09/09/2021 | 14/10/2021 | 35 |
| 155 | 203 | Y | 13/10/2021 | 17/11/2021 | 35 |
| 156 | 244 | Y | 09/09/2022 | 14/10/2022 | 35 |
| 157 | 102 | Y | 04/12/2019 | 07/01/2020 | 34 |
| 158 | 442 | Y | 18/10/2022 | 21/11/2022 | 34 |
| 159 | 237 | N | 27/02/2020 | 31/03/2020 | 33 |
| 160 | 475 | Y | 29/08/2022 | 01/10/2022 | 33 |
| 161 | 516 | Y | 07/04/2022 | 09/05/2022 | 32 |
| 162 | 438 | Y | 21/03/2023 | 21/04/2023 | 31 |
| 163 | 673 | Y | 16/08/2022 | 16/09/2022 | 31 |
| 164 | 174 | Y | 30/01/2023 | 01/03/2023 | 30 |
| 165 | 021 | Y | 22/05/2023 | 21/06/2023 | 30 |
| 166 | 437 | Y | 15/05/2023 | 14/06/2023 | 30 |
| 167 | 006 | Y | 30/11/2022 | 30/12/2022 | 30 |
| 168 | 491 | Y | 24/10/2022 | 23/11/2022 | 30 |
| 169 | 185 | N | 19/10/2020 | 18/11/2020 | 30 |
| 170 | 418 | Y | 21/01/2022 | 20/02/2022 | 30 |
| 171 | 498 | N | 10/03/2020 | 09/04/2020 | 30 |
| 172 | 242 | Y | 20/03/2024 | 18/04/2024 | 29 |
| 173 | 473 | N | 27/02/2020 | 27/03/2020 | 29 |
| 174 | 594 | Y | 02/06/2022 | 01/07/2022 | 29 |
| 175 | 015 | Y | 25/10/2022 | 23/11/2022 | 29 |
| 176 | 381 | Y | 06/03/2023 | 04/04/2023 | 29 |
| 177 | 095 | Y | 28/09/2022 | 26/10/2022 | 28 |
| 178 | 281 | Y | 12/04/2023 | 10/05/2023 | 28 |
| 179 | 011 | Y | 02/05/2023 | 30/05/2023 | 28 |
| 180 | 273 | Y | 11/05/2023 | 08/06/2023 | 28 |
| 181 | 503 | N | 12/03/2020 | 09/04/2020 | 28 |
| 182 | 511 | Y | 22/03/2023 | 19/04/2023 | 28 |
| 183 | 499 | Y | 17/03/2022 | 13/04/2022 | 27 |
| 184 | 533 | Y | 26/02/2022 | 25/03/2022 | 27 |
| 185 | 107 | Y | 15/11/2023 | 11/12/2023 | 26 |
| 186 | 258 | Y | 05/10/2023 | 30/10/2023 | 25 |
| 187 | 677 | Y | 21/06/2021 | 16/07/2021 | 25 |
| 188 | 140 | Y | 13/01/2022 | 07/02/2022 | 25 |
| 189 | 446 | Y | 05/08/2022 | 30/08/2022 | 25 |
| 190 | 354 | N | 24/02/2020 | 20/03/2020 | 25 |
| 191 | 193 | Y | 30/03/2021 | 23/04/2021 | 24 |
| 192 | 333 | Y | 21/07/2023 | 14/08/2023 | 24 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date of AustralianSuper determination | Date claimant notified of determination | Days taken to notify claimant of determination |
|-----|--------------------------|-----------------------------|---------------------------------------|---|--|
| 193 | 350 | Y | 17/11/2021 | 10/12/2021 | 23 |
| 194 | 666 | Y | 29/06/2021 | 22/07/2021 | 23 |
| 195 | 610 | Y | 02/07/2022 | 25/07/2022 | 23 |
| 196 | 105 | N | 26/10/2020 | 18/11/2020 | 23 |
| 197 | 152 | Y | 18/10/2021 | 09/11/2021 | 22 |
| 198 | 689 | Y | 16/11/2022 | 08/12/2022 | 22 |
| 199 | 240 | Y | 13/05/2024 | 03/06/2024 | 21 |
| 200 | 130 | Y | 15/01/2024 | 05/02/2024 | 21 |
| 201 | 062 | Y | 06/10/2022 | 27/10/2022 | 21 |
| 202 | 253 | Y | 15/09/2021 | 06/10/2021 | 21 |
| 203 | 039 | N | 27/11/2020 | 18/12/2020 | 21 |
| 204 | 089 | N | 28/10/2020 | 18/11/2020 | 21 |
| 205 | 547 | N | 28/01/2021 | 18/02/2021 | 21 |
| 206 | 582 | Y | 21/04/2023 | 11/05/2023 | 20 |
| 207 | 031 | Y | 23/06/2023 | 13/07/2023 | 20 |
| 208 | 033 | Y | 24/08/2021 | 13/09/2021 | 20 |
| 209 | 659 | Y | 09/02/2022 | 01/03/2022 | 20 |
| 210 | 018 | N | 16/10/2020 | 05/11/2020 | 20 |
| 211 | 388 | N | 23/12/2020 | 12/01/2021 | 20 |
| 212 | 049 | N | 03/03/2021 | 22/03/2021 | 19 |
| 213 | 598 | Y | 02/11/2023 | 21/11/2023 | 19 |
| 214 | 385 | Y | 03/08/2022 | 22/08/2022 | 19 |
| 215 | 696 | Y | 07/03/2024 | 26/03/2024 | 19 |
| 216 | 034 | Y | 28/04/2023 | 16/05/2023 | 18 |
| 217 | 270 | Y | 29/05/2020 | 16/06/2020 | 18 |
| 218 | 288 | Y | 26/11/2021 | 14/12/2021 | 18 |
| 219 | 536 | Y | 04/08/2023 | 22/08/2023 | 18 |
| 220 | 427 | Y | 25/07/2022 | 09/08/2022 | 15 |
| 221 | 623 | Y | 27/08/2024 | 11/09/2024 | 15 |
| 222 | 460 | Y | 14/05/2023 | 29/05/2023 | 15 |
| 223 | 546 | Y | 16/01/2023 | 31/01/2023 | 15 |
| 224 | 645 | Y | 23/01/2023 | 07/02/2023 | 15 |
| 225 | 233 | Y | 19/04/2023 | 04/05/2023 | 15 |
| 226 | 327 | Y | 27/05/2021 | 11/06/2021 | 15 |
| 227 | 023 | N | 12/10/2020 | 27/10/2020 | 15 |
| 228 | 180 | Y | 13/10/2020 | 28/10/2020 | 15 |

Schedule 4 – Delay in making payment

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper had all the information required to make a payment | Date payment was made | Days taken to make payment |
|----|--------------------------|-----------------------------|---|-----------------------|----------------------------|
| 1 | 457 | N | 01/10/2020 | 15/11/2023 | 1140 |
| 2 | 392 | N | 22/09/2022 | 04/12/2023 | 438 |
| 3 | 672 | Y | 19/08/2022 | 05/10/2023 | 412 |
| 4 | 298 | N | 07/02/2023 | 08/02/2024 | 366 |
| 5 | 736 | N | 13/12/2022 | 07/11/2023 | 329 |
| 6 | 736 | N | 13/12/2022 | 31/10/2023 | 322 |
| 7 | 257 | N | 06/01/2021 | 27/09/2021 | 264 |
| 8 | 192 | N | 19/01/2023 | 27/09/2023 | 251 |
| 9 | 286 | N | 10/01/2020 | 10/08/2020 | 213 |
| 10 | 376 | N | 19/04/2023 | 14/11/2023 | 209 |
| 11 | 050 | N | 03/05/2023 | 27/10/2023 | 177 |
| 12 | 144 | Y | 17/03/2020 | 07/09/2020 | 174 |
| 13 | 504 | Y | 11/10/2022 | 30/03/2023 | 170 |
| 14 | 084 | Y | 07/06/2023 | 16/11/2023 | 162 |
| 15 | 572 | Y | 29/11/2022 | 26/04/2023 | 148 |
| 16 | 535 | Y | 30/05/2023 | 23/10/2023 | 146 |
| 17 | 120 | Y | 03/04/2020 | 17/08/2020 | 136 |
| 18 | 297 | Y | 10/10/2022 | 20/02/2023 | 133 |
| 19 | 730 | Y | 31/08/2023 | 29/12/2023 | 120 |
| 20 | 709 | Y | 12/01/2023 | 12/05/2023 | 120 |
| 21 | 308 | N | 16/02/2021 | 11/06/2021 | 115 |
| 22 | 470 | Y | 28/12/2022 | 21/04/2023 | 114 |
| 23 | 494 | N | 12/11/2020 | 05/03/2021 | 113 |
| 24 | 750 | Y | 20/07/2023 | 09/11/2023 | 112 |
| 25 | 203 | Y | 22/12/2021 | 07/04/2022 | 106 |
| 26 | 397 | N | 18/11/2020 | 04/03/2021 | 106 |
| 27 | 699 | Y | 02/02/2023 | 19/05/2023 | 106 |
| 28 | 445 | Y | 27/07/2022 | 09/11/2022 | 105 |
| 29 | 670 | Y | 06/09/2022 | 20/12/2022 | 105 |
| 30 | 287 | N | 11/09/2020 | 23/12/2020 | 103 |
| 31 | 663 | Y | 04/03/2022 | 15/06/2022 | 103 |
| 32 | 456 | N | 25/01/2023 | 08/05/2023 | 103 |
| 33 | 132 | N | 08/06/2023 | 18/09/2023 | 102 |
| 34 | 331 | Y | 07/02/2023 | 19/05/2023 | 101 |
| 35 | 624 | Y | 13/03/2024 | 21/06/2024 | 100 |
| 36 | 500 | N | 04/04/2023 | 13/07/2023 | 100 |
| 37 | 299 | N | 01/03/2021 | 08/06/2021 | 99 |
| 38 | 134 | N | 09/11/2020 | 09/02/2021 | 92 |
| 39 | 234 | Y | 03/05/2023 | 31/07/2023 | 89 |
| 40 | 383 | N | 05/08/2020 | 02/11/2020 | 89 |
| 41 | 117 | N | 14/12/2020 | 11/03/2021 | 87 |
| 42 | 037 | Y | 18/09/2023 | 13/12/2023 | 86 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper had all the information required to make a payment | Date payment was made | Days taken to make payment |
|----|--------------------------|-----------------------------|---|-----------------------|----------------------------|
| 43 | 271 | Y | 02/05/2023 | 27/07/2023 | 86 |
| 44 | 359 | N | 09/11/2020 | 02/02/2021 | 85 |
| 45 | 747 | Y | 09/11/2020 | 29/01/2021 | 81 |
| 46 | 084 | Y | 10/02/2023 | 01/05/2023 | 80 |
| 47 | 320 | Y | 09/08/2023 | 27/10/2023 | 79 |
| 48 | 442 | Y | 26/12/2022 | 15/03/2023 | 79 |
| 49 | 274 | N | 05/06/2023 | 23/08/2023 | 79 |
| 50 | 565 | Y | 18/09/2022 | 05/12/2022 | 78 |
| 51 | 094 | Y | 27/02/2023 | 16/05/2023 | 78 |
| 52 | 066 | Y | 30/07/2021 | 15/10/2021 | 77 |
| 53 | 084 | Y | 10/02/2023 | 28/04/2023 | 77 |
| 54 | 704 | Y | 08/02/2023 | 26/04/2023 | 77 |
| 55 | 064 | Y | 29/12/2022 | 15/03/2023 | 76 |
| 56 | 162 | N | 01/12/2020 | 15/02/2021 | 76 |
| 57 | 368 | N | 19/07/2022 | 03/10/2022 | 76 |
| 58 | 718 | Y | 13/05/2022 | 27/07/2022 | 75 |
| 59 | 723 | Y | 09/06/2023 | 23/08/2023 | 75 |
| 60 | 246 | Y | 13/08/2023 | 27/10/2023 | 75 |
| 61 | 377 | N | 23/04/2021 | 06/07/2021 | 74 |
| 62 | 630 | N | 17/11/2023 | 30/01/2024 | 74 |
| 63 | 079 | Y | 09/08/2022 | 20/10/2022 | 72 |
| 64 | 687 | Y | 06/09/2022 | 17/11/2022 | 72 |
| 65 | 515 | Y | 06/09/2022 | 16/11/2022 | 71 |
| 66 | 407 | Y | 06/07/2023 | 14/09/2023 | 70 |
| 67 | 334 | N | 09/07/2020 | 17/09/2020 | 70 |
| 68 | 109 | N | 26/02/2021 | 05/05/2021 | 68 |
| 69 | 058 | Y | 21/02/2021 | 29/04/2021 | 67 |
| 70 | 467 | N | 14/12/2023 | 19/02/2024 | 67 |
| 71 | 453 | Y | 29/01/2024 | 04/04/2024 | 66 |
| 72 | 297 | Y | 16/12/2022 | 20/02/2023 | 66 |
| 73 | 645 | Y | 14/03/2023 | 18/05/2023 | 65 |
| 74 | 143 | Y | 12/01/2023 | 16/03/2023 | 63 |
| 75 | 640 | Y | 04/11/2022 | 05/01/2023 | 62 |
| 76 | 532 | N | 14/01/2021 | 16/03/2021 | 61 |
| 77 | 681 | Y | 17/02/2023 | 18/04/2023 | 60 |
| 78 | 383 | N | 28/05/2020 | 27/07/2020 | 60 |
| 79 | 235 | Y | 09/02/2024 | 08/04/2024 | 59 |
| 80 | 101 | Y | 12/07/2023 | 08/09/2023 | 58 |
| 81 | 154 | Y | 14/08/2023 | 11/10/2023 | 58 |
| 82 | 743 | Y | 18/03/2020 | 14/05/2020 | 57 |
| 83 | 157 | Y | 17/04/2023 | 13/06/2023 | 57 |
| 84 | 711 | N | 08/04/2021 | 04/06/2021 | 57 |
| 85 | 342 | Y | 20/04/2022 | 16/06/2022 | 57 |
| 86 | 281 | Y | 29/05/2023 | 24/07/2023 | 56 |
| 87 | 440 | N | 07/04/2020 | 01/06/2020 | 55 |
| 88 | 275 | Y | 05/06/2020 | 30/07/2020 | 55 |
| 89 | 160 | Y | 02/05/2022 | 26/06/2022 | 55 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper had all the information required to make a payment | Date payment was made | Days taken to make payment |
|-----|--------------------------|-----------------------------|---|-----------------------|----------------------------|
| 90 | 717 | N | 10/08/2023 | 04/10/2023 | 55 |
| 91 | 396 | Y | 27/04/2023 | 20/06/2023 | 54 |
| 92 | 521 | Y | 28/03/2022 | 20/05/2022 | 53 |
| 93 | 695 | Y | 11/05/2023 | 03/07/2023 | 53 |
| 94 | 221 | Y | 30/06/2023 | 21/08/2023 | 52 |
| 95 | 680 | Y | 20/06/2022 | 11/08/2022 | 52 |
| 96 | 745 | N | 23/12/2020 | 12/02/2021 | 51 |
| 97 | 046 | N | 01/11/2023 | 22/12/2023 | 51 |
| 98 | 169 | Y | 21/03/2022 | 10/05/2022 | 50 |
| 99 | 448 | N | 29/10/2020 | 18/12/2020 | 50 |
| 100 | 481 | Y | 19/01/2023 | 10/03/2023 | 50 |
| 101 | 352 | N | 15/10/2023 | 04/12/2023 | 50 |
| 102 | 025 | Y | 15/06/2023 | 03/08/2023 | 49 |
| 103 | 668 | Y | 07/03/2023 | 24/04/2023 | 48 |
| 104 | 060 | Y | 06/02/2024 | 25/03/2024 | 48 |
| 105 | 011 | Y | 04/07/2023 | 21/08/2023 | 48 |
| 106 | 740 | Y | 17/05/2023 | 03/07/2023 | 47 |
| 107 | 461 | N | 08/04/2021 | 25/05/2021 | 47 |
| 108 | 339 | Y | 02/11/2022 | 19/12/2022 | 47 |
| 109 | 421 | Y | 06/07/2023 | 21/08/2023 | 46 |
| 110 | 715 | Y | 07/07/2023 | 22/08/2023 | 46 |
| 111 | 668 | Y | 14/10/2022 | 29/11/2022 | 46 |
| 112 | 413 | Y | 09/06/2023 | 25/07/2023 | 46 |
| 113 | 115 | Y | 17/10/2022 | 01/12/2022 | 45 |
| 114 | 383 | N | 25/09/2020 | 09/11/2020 | 45 |
| 115 | 545 | N | 19/10/2020 | 03/12/2020 | 45 |
| 116 | 168 | Y | 22/08/2023 | 05/10/2023 | 44 |
| 117 | 656 | Y | 19/06/2024 | 02/08/2024 | 44 |
| 118 | 205 | N | 07/04/2021 | 20/05/2021 | 43 |
| 119 | 337 | Y | 15/03/2022 | 27/04/2022 | 43 |
| 120 | 074 | Y | 05/10/2022 | 16/11/2022 | 42 |
| 121 | 104 | Y | 04/08/2023 | 15/09/2023 | 42 |
| 122 | 174 | Y | 01/06/2023 | 13/07/2023 | 42 |
| 123 | 512 | N | 28/09/2023 | 09/11/2023 | 42 |
| 124 | 724 | Y | 15/04/2021 | 26/05/2021 | 41 |
| 125 | 661 | Y | 07/07/2022 | 17/08/2022 | 41 |
| 126 | 739 | N | 19/01/2021 | 01/03/2021 | 41 |
| 127 | 105 | N | 23/12/2020 | 02/02/2021 | 41 |
| 128 | 517 | Y | 06/10/2022 | 16/11/2022 | 41 |
| 129 | 410 | Y | 28/04/2023 | 08/06/2023 | 41 |
| 130 | 116 | Y | 20/08/2020 | 29/09/2020 | 40 |
| 131 | 079 | Y | 31/03/2022 | 10/05/2022 | 40 |
| 132 | 746 | N | 05/08/2020 | 14/09/2020 | 40 |
| 133 | 664 | N | 15/04/2020 | 25/05/2020 | 40 |
| 134 | 704 | Y | 26/04/2023 | 05/06/2023 | 40 |
| 135 | 631 | Y | 26/07/2024 | 03/09/2024 | 39 |
| 136 | 704 | Y | 27/04/2023 | 05/06/2023 | 39 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper had all the information required to make a payment | Date payment was made | Days taken to make payment |
|-----|--------------------------|-----------------------------|---|-----------------------|----------------------------|
| 137 | 307 | N | 22/12/2023 | 30/01/2024 | 39 |
| 138 | 650 | Y | 30/07/2024 | 06/09/2024 | 38 |
| 139 | 430 | Y | 08/05/2023 | 15/06/2023 | 38 |
| 140 | 751 | N | 07/09/2020 | 15/10/2020 | 38 |
| 141 | 729 | N | 06/04/2020 | 14/05/2020 | 38 |
| 142 | 664 | N | 17/04/2020 | 25/05/2020 | 38 |
| 143 | 009 | Y | 19/09/2023 | 26/10/2023 | 37 |
| 144 | 169 | Y | 30/03/2022 | 06/05/2022 | 37 |
| 145 | 721 | N | 19/01/2021 | 25/02/2021 | 37 |
| 146 | 178 | Y | 19/06/2024 | 25/07/2024 | 36 |
| 147 | 167 | Y | 11/01/2024 | 16/02/2024 | 36 |
| 148 | 713 | Y | 17/05/2023 | 22/06/2023 | 36 |
| 149 | 511 | Y | 23/05/2023 | 28/06/2023 | 36 |
| 150 | 027 | N | 29/10/2020 | 04/12/2020 | 36 |
| 151 | 322 | N | 03/03/2021 | 08/04/2021 | 36 |
| 152 | 272 | Y | 04/07/2023 | 09/08/2023 | 36 |
| 153 | 068 | Y | 26/07/2023 | 30/08/2023 | 35 |
| 154 | 713 | Y | 17/05/2023 | 21/06/2023 | 35 |
| 155 | 111 | Y | 10/02/2023 | 17/03/2023 | 35 |
| 156 | 273 | Y | 13/07/2023 | 17/08/2023 | 35 |
| 157 | 540 | Y | 03/02/2022 | 10/03/2022 | 35 |
| 158 | 447 | N | 05/03/2020 | 09/04/2020 | 35 |
| 159 | 117 | N | 05/02/2021 | 12/03/2021 | 35 |
| 160 | 071 | Y | 27/01/2021 | 03/03/2021 | 35 |
| 161 | 709 | Y | 12/01/2023 | 16/02/2023 | 35 |
| 162 | 298 | N | 07/02/2023 | 14/03/2023 | 35 |
| 163 | 429 | N | 13/10/2020 | 16/11/2020 | 34 |
| 164 | 733 | N | 14/05/2021 | 14/06/2021 | 31 |
| 165 | 375 | N | 12/10/2020 | 12/11/2020 | 31 |
| 166 | 443 | Y | 02/08/2022 | 01/09/2022 | 30 |
| 167 | 373 | Y | 28/02/2023 | 29/03/2023 | 29 |
| 168 | 198 | Y | 29/08/2023 | 27/09/2023 | 29 |
| 169 | 479 | Y | 07/12/2022 | 05/01/2023 | 29 |
| 170 | 573 | Y | 06/04/2023 | 05/05/2023 | 29 |
| 171 | 073 | Y | 24/08/2023 | 22/09/2023 | 29 |
| 172 | 310 | N | 06/05/2020 | 04/06/2020 | 29 |
| 173 | 361 | N | 12/11/2020 | 11/12/2020 | 29 |
| 174 | 196 | N | 14/10/2020 | 12/11/2020 | 29 |
| 175 | 665 | N | 18/06/2020 | 17/07/2020 | 29 |
| 176 | 033 | Y | 11/01/2022 | 08/02/2022 | 28 |
| 177 | 204 | Y | 31/05/2023 | 28/06/2023 | 28 |
| 178 | 004 | N | 12/10/2020 | 09/11/2020 | 28 |
| 179 | 468 | N | 29/10/2020 | 26/11/2020 | 28 |
| 180 | 255 | Y | 10/08/2022 | 07/09/2022 | 28 |
| 181 | 660 | Y | 27/05/2020 | 23/06/2020 | 27 |
| 182 | 088 | N | 28/09/2023 | 25/10/2023 | 27 |
| 183 | 498 | N | 30/04/2020 | 26/05/2020 | 26 |
| 184 | 278 | N | 26/03/2021 | 21/04/2021 | 26 |
| 185 | 372 | N | 01/01/2021 | 27/01/2021 | 26 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper had all the information required to make a payment | Date payment was made | Days taken to make payment |
|-----|--------------------------|-----------------------------|---|-----------------------|----------------------------|
| 186 | 431 | Y | 19/04/2023 | 15/05/2023 | 26 |
| 187 | 482 | Y | 02/10/2021 | 27/10/2021 | 25 |
| 188 | 691 | Y | 05/09/2024 | 30/09/2024 | 25 |
| 189 | 716 | Y | 07/07/2022 | 01/08/2022 | 25 |
| 190 | 617 | Y | 30/03/2023 | 24/04/2023 | 25 |
| 191 | 107 | Y | 15/01/2024 | 09/02/2024 | 25 |
| 192 | 149 | N | 21/03/2021 | 15/04/2021 | 25 |
| 193 | 730 | Y | 07/11/2022 | 02/12/2022 | 25 |
| 194 | 237 | N | 29/06/2020 | 23/07/2020 | 24 |
| 195 | 734 | N | 14/05/2021 | 07/06/2021 | 24 |
| 196 | 548 | N | 26/04/2021 | 20/05/2021 | 24 |
| 197 | 491 | Y | 28/12/2022 | 20/01/2023 | 23 |
| 198 | 230 | Y | 13/12/2021 | 05/01/2022 | 23 |
| 199 | 085 | N | 04/08/2020 | 27/08/2020 | 23 |
| 200 | 147 | N | 12/05/2020 | 04/06/2020 | 23 |
| 201 | 113 | Y | 16/01/2023 | 08/02/2023 | 23 |
| 202 | 069 | N | 10/10/2023 | 02/11/2023 | 23 |
| 203 | 386 | N | 27/12/2023 | 19/01/2024 | 23 |
| 204 | 015 | Y | 28/12/2022 | 19/01/2023 | 22 |
| 205 | 128 | Y | 25/11/2021 | 17/12/2021 | 22 |
| 206 | 018 | N | 17/12/2020 | 08/01/2021 | 22 |
| 207 | 516 | Y | 15/12/2022 | 06/01/2023 | 22 |
| 208 | 667 | Y | 02/07/2024 | 23/07/2024 | 21 |
| 209 | 078 | Y | 14/09/2022 | 05/10/2022 | 21 |
| 210 | 263 | Y | 12/01/2023 | 02/02/2023 | 21 |
| 211 | 631 | Y | 15/08/2024 | 05/09/2024 | 21 |
| 212 | 547 | N | 21/05/2021 | 11/06/2021 | 21 |
| 213 | 294 | N | 06/01/2021 | 27/01/2021 | 21 |
| 214 | 048 | N | 15/07/2020 | 05/08/2020 | 21 |
| 215 | 267 | N | 30/07/2020 | 20/08/2020 | 21 |
| 216 | 277 | N | 11/10/2023 | 01/11/2023 | 21 |
| 217 | 547 | N | 25/03/2021 | 14/04/2021 | 20 |
| 218 | 398 | N | 23/03/2021 | 12/04/2021 | 20 |
| 219 | 288 | Y | 18/01/2022 | 07/02/2022 | 20 |
| 220 | 154 | Y | 13/06/2024 | 03/07/2024 | 20 |
| 221 | 551 | Y | 29/06/2023 | 18/07/2023 | 19 |
| 222 | 232 | N | 19/11/2020 | 08/12/2020 | 19 |
| 223 | 316 | N | 24/12/2020 | 12/01/2021 | 19 |
| 224 | 184 | Y | 15/07/2020 | 03/08/2020 | 19 |
| 225 | 272 | Y | 09/06/2023 | 28/06/2023 | 19 |
| 226 | 020 | Y | 07/10/2020 | 26/10/2020 | 19 |
| 227 | 630 | N | 17/11/2023 | 06/12/2023 | 19 |
| 228 | 321 | N | 26/10/2023 | 14/11/2023 | 19 |
| 229 | 631 | Y | 15/07/2024 | 02/08/2024 | 18 |
| 230 | 165 | N | 12/07/2020 | 30/07/2020 | 18 |
| 231 | 049 | N | 17/05/2021 | 04/06/2021 | 18 |
| 232 | 451 | Y | 21/05/2024 | 07/06/2024 | 17 |
| 233 | 001 | Y | 20/06/2022 | 07/07/2022 | 17 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Date AustralianSuper had all the information required to make a payment | Date payment was made | Days taken to make payment |
|-----|--------------------------|-----------------------------|---|-----------------------|----------------------------|
| 234 | 686 | Y | 04/08/2023 | 21/08/2023 | 17 |
| 235 | 426 | Y | 26/02/2021 | 15/03/2021 | 17 |
| 236 | 186 | N | 12/02/2021 | 01/03/2021 | 17 |
| 237 | 688 | Y | 13/04/2022 | 29/04/2022 | 16 |
| 238 | 748 | N | 29/09/2020 | 15/10/2020 | 16 |
| 239 | 433 | N | 13/01/2021 | 29/01/2021 | 16 |
| 240 | 322 | N | 08/06/2021 | 24/06/2021 | 16 |
| 241 | 218 | Y | 08/11/2022 | 24/11/2022 | 16 |
| 242 | 031 | Y | 19/06/2024 | 05/07/2024 | 16 |
| 243 | 265 | Y | 02/12/2020 | 18/12/2020 | 16 |
| 244 | 029 | Y | 26/12/2022 | 10/01/2023 | 15 |
| 245 | 021 | Y | 15/08/2023 | 30/08/2023 | 15 |
| 246 | 158 | Y | 20/12/2022 | 04/01/2023 | 15 |
| 247 | 498 | N | 11/05/2020 | 26/05/2020 | 15 |
| 248 | 354 | N | 28/04/2020 | 13/05/2020 | 15 |
| 249 | 087 | N | 17/03/2021 | 01/04/2021 | 15 |
| 250 | 110 | N | 29/04/2020 | 14/05/2020 | 15 |
| 251 | 188 | Y | 11/11/2020 | 26/11/2020 | 15 |
| 252 | 010 | Y | 27/09/2022 | 12/10/2022 | 15 |
| 253 | 379 | Y | 02/11/2023 | 17/11/2023 | 15 |
| 254 | 344 | N | 01/04/2020 | 16/04/2020 | 15 |
| 255 | 318 | N | 11/09/2023 | 26/09/2023 | 15 |
| 256 | 487 | N | 11/10/2023 | 26/10/2023 | 15 |

Schedule 5 – Delay in requesting or providing information

| | Unique member Identifier | BDBN and no objection [Y/N] | Details of delay | Days taken to request information |
|---|--------------------------|-----------------------------|---|-----------------------------------|
| 1 | 510 | N | Information was requested from the claimant on 19/05/2022. No follow up request was sent to the claimant until 30/10/2023. | 529 |
| 2 | 392 | N | Claimant provided claim forms and certified documents to AustralianSuper on 29/12/2021, but a re-certified death certificate was only requested on 21/12/2022. | 357 |
| 3 | 455 | N | Claimant provided completed claim forms to AustralianSuper on 02/06/2022, but a certified copy of the death certificate and identification was only requested on 17/04/2023. | 319 |
| 4 | 411 | Y | Claimant's solicitor provided completed claim forms to AustralianSuper on 14/12/2022, but a clearer copy of the completed form was only requested on 6/10/2023. | 296 |
| 5 | 449 | N | Claimant provided claim forms to AustralianSuper on 31/01/2022, further documents required to progress the claim were not requested until 16/09/2022. | 228 |
| 6 | 056 | N | Claimant provided claim forms to AustralianSuper on 09/07/2021, further documents required to progress the claim were not requested until 01/02/2022. | 207 |
| 7 | 559 | Y | Claimant's solicitor provided claim form and supporting documents to AustralianSuper on 24/08/2022, further information required to progress the claim was not requested until 16/03/2023. | 203 |
| 8 | 444 | N | The claims form was sent to an incorrect email address on 12/07/2022. Claimant's solicitor sent 7 follow up emails requesting that the claims forms be resent (first follow up being on 18/08/2022). The claim forms were only provided to the correct email address on 14/02/2023. | 180 |
| 9 | 007 | N | Claimant provided claim forms to AustralianSuper on 28/03/2023. No acknowledgement of receipt was provided. Claimant followed up regarding the progress of the claim on 19/04/2023 and 3/05/2023. Further documents required to progress the claim were not requested until 19/09/2023. | 175 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Details of delay | Days taken to request information |
|----|--------------------------|-----------------------------|--|-----------------------------------|
| 10 | 250 | N | Claimant provided claim forms to AustralianSuper on 14/07/2022, further documents required to progress the claim were not requested until 04/01/2023. | 174 |
| 11 | 209 | N | Claimant provided completed claim forms to AustralianSuper on 23/03/2022, further documents required to progress the claim were not requested until 27/07/2022. | 154 |
| 12 | 683 | Y | On 30/3/22, a recommendation on the claim was made. However, it took AustralianSuper until 29/8/2022 to locate a copy of the BDBN from AustralianSuper's records in order for signoff of the recommendation to take place. | 152 |
| 13 | 046 | N | Claimant provided completed claim forms to AustralianSuper on 03/12/2022. The claimant was only notified that the third party authority form was invalid and a new form requested on 03/05/2023. | 151 |
| 14 | 717 | N | Claimant provided claim forms to AustralianSuper on 17/06/2022, further documents required to progress the claim were not requested until 14/11/2022. | 150 |
| 15 | 416 | N | Claimant provided documents to AustralianSuper on 15/11/2021, further documents required to progress the claim were not requested until 21/03/2022. | 136 |
| 16 | 395 | N | Initial claim pack sent to claimant on 14/07/2021, but AustralianSuper did not follow up on claim forms until 23/11/2021. | 132 |
| 17 | 341 | N | Claimant provided claim forms on 06/06/2023, but no action taken to progress claim until 12/10/2023. | 128 |
| 18 | 313 | Y | Further information was requested from member's employer on 23/11/2021, but no follow up email was sent until 26/03/2022. | 123 |
| 19 | 043 | N | Claimant provided claim forms and supporting documents to AustralianSuper on 16/06/2023, a TFN form was only requested on 12/10/2023. | 118 |
| 20 | 591 | N | Claimant provided claim forms to AustralianSuper on 14/10/2022, further documents required to progress the claim were not requested until 08/02/2023. | 117 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Details of delay | Days taken to request information |
|----|--------------------------|-----------------------------|---|-----------------------------------|
| 21 | 148 | N | Claimant's solicitor provided claim forms to AustralianSuper on 10/04/2023, but a statutory declaration was not requested until 02/08/2023. This request had previously been sent to the wrong person. | 114 |
| 22 | 753 | N | Claimant provided documents to AustralianSuper on 15/11/2021, further information required to progress the claim was not requested until 07/03/2022. | 112 |
| 23 | 261 | Y | Claimant provided claim forms and supporting documents on 27/10/2022 and 4/11/2022, further information required to progress claim was not requested until 17/02/2023. | 105 |
| 24 | 108 | N | Claimant's solicitor provided requested third party authority form on 08/07/2020, and AustralianSuper requested this form again on 16/10/2020. | 100 |
| 25 | 512 | N | Claimant's solicitor provided claim forms to AustralianSuper on 10/02/2022, no contact was made with the claimant's solicitors until 18/05/2022. During this time the solicitors attempted to contact AustralianSuper on 24/03/2022 and 26/04/2022. | 98 |
| 26 | 315 | Y | Claimant provided copy of death certificate by around 15/05/2020. AustralianSuper did not inform the claimant that the death certificate was not certified properly until 21/08/2020. | 98 (at least) |
| 27 | 054 | N | Claimant provided documents to AustralianSuper on 13/01/2023, further documents required to progress the claim were not requested until 18/04/2023. | 95 |
| 28 | 298 | N | Claimant provided claim forms to AustralianSuper on 17/08/2022, there was no acknowledge of receipt of documents until 16/11/2022. | 91 |
| 29 | 478 | N | Claimant's solicitor provided claim form and supporting documents to AustralianSuper on 01/05/2020, further information required to progress the claim was not requested until 28/07/2020. | 88 |
| 30 | 422 | N | Claimant provided documents to AustralianSuper on 17/03/2023, further documents required to progress the claim were not requested until 13/06/2023. | 88 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Details of delay | Days taken to request information |
|----|--------------------------|-----------------------------|---|-----------------------------------|
| 31 | 648 | N | Claimant provided documents to AustralianSuper on 18/08/2023, further information required to progress the claim was not requested until 14/11/2023. | 88 |
| 32 | 307 | N | Claimant provided documents to AustralianSuper on 16/08/2022, further information required to progress the claim was not requested until 10/11/2022. | 86 |
| 33 | 050 | N | Claimant provided claim form and documents to AustralianSuper on 10/03/2022, further information required to progress the claim was not requested until 03/06/2022. | 85 |
| 34 | 088 | N | Claimant provided documents to AustralianSuper on 16/02/2022, further information required to progress the claim was not requested until 12/05/2022. | 85 |
| 35 | 219 | N | Initial claim pack sent to claimant on 04/03/2022, but AustralianSuper did not follow up on claim forms until 26/05/2022. | 83 |
| 36 | 040 | N | Claimant provided documents to AustralianSuper on 18/08/2022, further documents required to progress the claim were not requested until 07/11/2022. | 81 |
| 37 | 175 | N | Claimant provided documents to AustralianSuper on 09/06/2023, further documents required to progress the claim were not requested until 29/08/2023. | 81 |
| 38 | 069 | N | Claimant provided documents to AustralianSuper on 10/02/2022, further information required to progress the claim was not requested until 02/05/2022. | 81 |
| 39 | 541 | N | Claimant provided claim forms on 13/04/2022, but no action was taken by AustralianSuper to progress claim until 30/06/2022. | 78 |
| 40 | 238 | N | Claimant provided documents to AustralianSuper on 01/03/2023, further information required to progress the claim was not requested until 16/05/2023. | 76 |
| 41 | 156 | N | Claimant provided documents to AustralianSuper on 05/05/2022, further information required to progress the claim was not requested until 19/07/2022. | 75 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Details of delay | Days taken to request information |
|----|--------------------------|-----------------------------|--|-----------------------------------|
| 42 | 132 | N | Claimant provided documents to AustralianSuper on 21/06/2022, further information required to progress the claim was not requested until 02/09/2022. | 73 |
| 43 | 414 | N | AustralianSuper requested claimant to provide new certified identification documents in 28 day letter on 14/09/2020, as identification previously provided was not dated. AustralianSuper did not follow up claimant for this until 24/11/2020 and claimant provided the identification one day later. | 71 |
| 44 | 295 | Y | The claimant was requested to provide new certified identification documents on 14/09/2020. This request was not followed up until 24/11/2020. | 71 |
| 45 | 483 | N | Claimant provided claim forms to AustralianSuper on 28/04/2022, further documents required to progress the claim were not requested until 05/07/2022. | 68 |
| 46 | 036 | N | Claimant provided signed trust deed to AustralianSuper on 3/10/2022. No attempt was made to access these documents, and then notify claimant that they could not access the documents, until 6/12/2022. | 64 |
| 47 | 274 | N | Claimant provided documents to AustralianSuper on 23/09/2022, further information required to progress the claim was not requested until 25/11/2022. | 63 |
| 48 | 047 | N | Claimant provided documents to AustralianSuper on 11/08/2023, further information required to progress the claim was not requested until 13/10/2023. | 63 |
| 49 | 179 | N | Claimant provided GreenID form on 19/08/2020, but AustralianSuper only requested new certified identification on 19/10/2020. | 61 |
| 50 | 754 | N | AustralianSuper emailed claimant on 17/04/2020 to return acceptance form for benefit to be paid out but did not request further information necessary to progress claim until 12/06/2020. | 57 |
| 51 | 119 | N | Claimant provided documents to AustralianSuper on 27/07/2023, but no action taken to progress claim until 21/09/2023. | 56 |
| 52 | 391 | N | Claimant provided documents to AustralianSuper on 21/03/2023, further information required to progress the | 56 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Details of delay | Days taken to request information |
|----|--------------------------|-----------------------------|--|-----------------------------------|
| | | | claim was not requested until 16/05/2023. | |
| 53 | 428 | N | Claimant provided claim form to AustralianSuper on 01/12/2021, further documents required to progress the claim were not requested until 25/01/2022. | 55 |
| 54 | 669 | N | Claimant provided information to AustralianSuper on 17/08/2021, further documents required to progress the claim were not requested until 08/10/2021. | 52 |
| 55 | 583 | N | Claimant provided documents to AustralianSuper on 08/06/2023, AustralianSuper did not acknowledge receipt of documents until after claimant followed up on 28/07/2023. | 51 |
| 56 | 030 | N | The claim was referred to the insurer on 26/07/2021. Insurer requested further information on 28/07/2021 and sent 4 separate follow up emails until 09/09/2021. These emails were not responded to until 11/09/2021. | 45 |
| 57 | 755 | N | AustralianSuper sent the 28 day letter on 05/01/2021 but did not request further documents required to finalise the claim from the claimant's solicitors until 16/02/2021. | 43 |
| 58 | 081 | N | The recommendation regarding the claim was completed and signed on 27/06/2023, but not submitted for review until 9/08/2023. | 43 |
| 59 | 120 | Y | 28 day letter requesting that Trust Deed be signed by the claimant (as trustee) provided by AustralianSuper to claimant on 13/02/2020. AustralianSuper did not inform claimant that further details and documents were required to make payment (including the details of a trust account) until 24/03/2020. | 40 |
| 60 | 434 | Y | AustralianSuper informed the claimant that their file was under review on 25/06/2020 and they will provide an update shortly, but no update is provided until 31/07/2020. | 36 |
| 61 | 457 | N | Claimant provided documents to AustralianSuper on 16/06/2020, further information required to progress the claim was not requested until 20/07/2020. | 34 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Details of delay | Days taken to request information |
|----|--------------------------|-----------------------------|--|-----------------------------------|
| 62 | 756 | Y | Claimant requested the benefit be deposited into an income stream on 3/05/2020. AustralianSuper did not respond to this request for additional information until 2/06/2020. The claimant's power of attorney requested further information regarding the process on 10/06/2020. AustralianSuper did not respond to the request for further information until 17/07/2020. | 31 and 38 |
| 63 | 309 | N | Claimant notified AustralianSuper of the death of the member on 05/07/2019. AustralianSuper did not send claims pack until 31/07/2019. | 26 |
| 64 | 757 | N | Claimant provided documents to AustralianSuper on 23/04/2021, further information required to progress the claim was not requested until 17/05/2021. Claimant provided further documents as requested on 26/06/2022, further information required to progress claim was not requested until 07/09/2022. | 25 and 76 |
| 65 | 052 | Y | Claimant provided claim forms to AustralianSuper on 20/07/2020, further information required to progress the claim was not requested until 10/08/2020. An email from the claimant's LPR was sent to AustralianSuper on 10/09/2020, but no response was provided by AustralianSuper until 2/10/2020. A trustee determination was made on 8/12/2020 but 28 day letters were not sent until 29/12/2020. | 21, 22 and 21 |
| 66 | 022 | Y | Trustee determination made on 5/06/2020 but 28 day letters were not sent until 25/06/2020. | 20 |
| 67 | 093 | Y | Claimant provided documents to AustralianSuper on 11/08/2020, further information required to progress the claim was not requested until 28/08/2020. The claimant sent an email on 18/10/2020, and no response was provided by AustralianSuper until 13/11/2020. | 17 and 26 |
| 68 | 035 | Y | Claimant provided information to AustralianSuper on 30/10/2019, further documents required to progress the claim were not requested until 14/11/2019. | 15 |

| | Unique member Identifier | BDBN and no objection [Y/N] | Details of delay | Days taken to request information |
|----|--------------------------|-----------------------------|---|-----------------------------------|
| 69 | 178 | Y | Trust account details for claimants who were minors were not requested until after the claim staking period had expired, despite it being apparent the claimant was a minor. This led to delays in payments being made, where AustralianSuper requested that claimants set up and provide details for trust accounts (despite it being possible for AustralianSuper to make payment by cheque). | Various |
| 70 | 161 | Y | | |
| 71 | 139 | Y | | |
| 72 | 157 | Y | | |
| 73 | 397 | N | | |
| 74 | 299 | N | | |
| 75 | 547 | N | | |
| 76 | 027 | N | | |
| 77 | 134 | N | | |
| 78 | 162 | N | | |
| 79 | 322 | N | | |
| 80 | 532 | N | | |
| 81 | 192 | N | | |
| 82 | 594 | Y | Claimants requested payments be made via income stream. There were delays by AustralianSuper in sending the necessary forms for the claimant to complete in order for this to be processed. Forms were only sent after the claim staking period expired, despite claimants notifying AustralianSuper of the request for payment via income stream earlier in the claims process. | Various |
| 83 | 407 | Y | | |
| 84 | 417 | Y | | |
| 85 | 421 | Y | | |
| 86 | 516 | Y | | |
| 87 | 509 | Y | | |
| 88 | 758 | Y | | |

Notes to schedules to Concise Statement

1. The tables set out in schedules 1 – 5 on pages 26 to 55 above reflect the following information (collectively, the **Schedules**):
 - (a) Column 1 of each Schedule numbers sequentially the instances of delay itemised in separate rows in that Schedule.
 - (b) Column 2 of each Schedule (titled 'Unique member identifier') identifies a unique member number allocated to the AustralianSuper member in relation to whom there was delay.
 - (c) Column 3 of each Schedule is titled 'BDBN and no objection [Y/N]'. This column identifies whether:
 - (i) the member had given a binding death benefit nomination (**BDBN**); *and*
 - (ii) AustralianSuper did not receive any objections to its decision.

This column is populated 'Y' where the relevant member was included in a response by AustralianSuper to a notice issued under s 33 of the *Australian Securities and Investments Commission Act 2001* (**ASIC Act**) requiring it to produce claims file documentation in relation to BDBN and no objection claims only.¹ The column is otherwise populated 'N'.
2. The tables immediately below on pages 56 to 58 identify and describe the balance of columns appearing in each Schedule.

Notes for Schedule 1 – Delay in sending claims pack

| Column | Description |
|--|--|
| Column 4: Date AustralianSuper identifies as the first notification of claim | The information in this column reflects data that AustralianSuper produced to ASIC in response to a notice issued under s912C of the <i>Corporations Act 2001</i> (the Act). ² AustralianSuper explained in correspondence to ASIC that this field represents the date when Link first received notification of a claim. ³ |
| Column 5: First date claims pack sent | The information in this column reflects the date a claims pack was sent to a claimant on behalf of AustralianSuper. ⁴ Where AustralianSuper issued multiple claims packs, the date the first claims pack was sent is identified in the Schedule. |
| Column 6: Days taken to send claims pack after claim notification | The information in this column reflects the number of days between the dates shown in the prior two columns. |

¹ Being notice bearing barcode NTC2425922.

² Being notice bearing barcode NTC2425927. The relevant data is contained within AustralianSuper's response to the notice at ft 2 (ARS.1024.0001.0005; ARS.1026.0001.0012) (**AS & Link Systems Data**), see sheets titled 'Category 5 (Accum)' and 'Category 5 (Pension)', column 'Date claim first notified'. Where a member did not appear in 'Category 5 (Accum)' or 'Category 5 (Pension)', data was sourced from sheet titled 'Category 4' column 'Notification Date'. Where multiple conflicting dates were included in the data provided by AustralianSuper under notice in respect of a single member, only the earliest in time date has been included in the Schedule.

³ Schedule 2 and Annexure A of Schedule 2 of AustralianSuper letter to ASIC dated 9 October 2024.

⁴ These claims packs, and (where applicable) the covering email that sent the claims packs, were produced by AustralianSuper to ASIC under notices bearing barcodes NTC2425922, NTC2426914 and NTC2422856.

Notes for Schedule 2 – Delay in reviewing recommendation and making determination

| Column | Description |
|--|--|
| Column 4: Date AustralianSuper identifies that it received a recommendation on claim | The information in this column is drawn from data that AustralianSuper produced to ASIC in response to a notice issued under s 912C of the Act. ⁵ AustralianSuper explained in correspondence to ASIC that this field represents the date on which 'the AustralianSuper Trustee claims team received a recommendation, based on email notification'. ⁶ |
| Column 5: Date AustralianSuper identifies that it reviewed a recommendation | The information in this column is drawn from data that AustralianSuper produced to ASIC in response to a notice issued under s 912C of the Act. ⁷ AustralianSuper explained in correspondence to ASIC that this field represents the date on which 'the AustralianSuper Trustee Claims team has either reviewed and made a decision on the death distribution or requested further information'. ⁸ |
| Column 6: Days taken to review recommendation | The information in this column reflects the number of days between the dates shown in the prior two columns. |

Notes for Schedule 3 – Delay in notifying claimant of determination

| Column | Description |
|--|--|
| Column 4: Date AustralianSuper made a determination | The date identified in this column is the date that AustralianSuper made its determination based on a review of documents produced by AustralianSuper in response to notices issued under s 33 of the ASIC Act. ⁹ |
| Column 5: Date claimant notified of determination | The date identified in this column is the date that AustralianSuper notified a claimant of its decision, either by way of claim-staking letter or other correspondence when claim-staking was waived, based on a review of documents produced by AustralianSuper in response to notices issued under s 33 of the ASIC Act. ¹⁰ |
| Column 6: Days taken to notify claimant of determination | The information in this column reflects the number of days between the dates shown in the prior two columns. |

Notes for Schedule 4 – Delay in making payment

| Column | Description |
|---|--|
| Column 4: Date AustralianSuper had all the information required to make a payment | <p>The date identified in this column is the later of:</p> <ul style="list-style-type: none"> the date when AustralianSuper received all necessary information to make a payment to a claimant;¹¹ or the date when the claim staking period expired for that claimant. <p>Members were identified following the review of documents relevant to 360 members, being documents produced by AustralianSuper in response to notices issued under s 33 of the ASIC Act.¹²</p> |

⁵ The relevant data is contained within the AS & Link Systems Data, sheet titled 'Category 1(a)', column 'Date Received'.

⁶ AustralianSuper letter to ASIC dated 31 October 2024.

⁷ The relevant data is contained within the AS & Link Systems Data, sheet titled 'Category 1(a)', column 'Review Date'.

⁸ AustralianSuper letter to ASIC dated 31 October 2024.

⁹ Being notices bearing barcodes NTC2425922, NTC2426914 and NTC2422856.

¹⁰ Being notices bearing barcodes NTC2425922, NTC2426914 and NTC2422856.

¹¹ Necessary information does not include documents that AustralianSuper did not require to make payment, such as EFT payment forms, TFN forms or acknowledgments of AustralianSuper's decision.

¹² Being notices bearing barcodes NTC2425922, NTC2426914 and NTC2422856.

| | |
|--------------------------------------|---|
| Column 5: Date payment was made | The date identified in this column is the date payment was made to a claimant, or alternatively where documents produced by AustralianSuper in response to notices issued under s 33 of the ASIC Act ¹³ was insufficient to enable that date to be identified the date recorded as the date of payment within data that AustralianSuper produced in response to a notice issued under s 912C of the Act. ¹⁴ |
| Column 6: Days taken to make payment | The information in this column reflects the number of days between the dates shown in the prior two columns. |

¹³ Being notices bearing barcodes NTC2425922, NTC2426914 and NTC2422856.

¹⁴ Being notice bearing barcode NTC2426919.