

## Insurance in Superannuation Voluntary Code of Practice Transition Plan

Date: 24 December 2019  
Issue No: 2

### About our Transition Plan

The Insurance in Superannuation Voluntary Code of Practice (Code) applies to superannuation trustees. Equity Trustees Superannuation Limited, the Trustee, supports the Code and its objectives. We intend to adopt the Code which started on 1 July 2018.

It is our intention to comply with various sections of the Code by the target compliance dates set out in this transition plan. However, given current uncertainty surrounding the potential legislative changes impacting insurance provided through superannuation, it may be necessary to update the plan as outlined below.

### What super products will need to comply with the Code?

Insurance cover is provided to eligible members through the following superannuation products:

Superannuation Fund	Superannuation Products
Colonial Super Retirement Fund ('CSRF')	<ul style="list-style-type: none"><li>• Colonial Personal Superannuation Portfolio</li><li>• Colonial Select Personal Superannuation</li><li>• Commonwealth Personal Super and Rollover Plan</li><li>• Commonwealth SuperSelect</li><li>• CPSL Master Fund Superannuation</li><li>• Cypros - Super</li><li>• Managed Investment Super Plan</li><li>• Retirement Saver</li><li>• Retirement Saver Plus</li><li>• Super Money Plan</li><li>• Supercare, Superlink, Superunit</li><li>• Superwise (version 4 &amp; 5)</li><li>• Umbrella Financial Plan</li><li>• Umbrella Investment Plan</li><li>• Term Life Insurance Super</li><li>• Income Protection Super</li><li>• Cycle Term Assurance</li><li>• Cycle Umbrella Term Plan</li><li>• Umbrella Term Plan</li><li>• Super Term Life</li></ul>

Certain components within the Code relate to the provision of insurance to new members. CSRF is a closed fund that does not offer any insurance to new members. As such certain standards of the Code will not apply to the CSRF.

## How and when we will comply with the Code

We have commenced a review of our insurance arrangements member engagement and services, to determine which aspects require change to comply with the standards in the Code. We will, however, prioritise the best interests of members and any law or regulation where it is inconsistent with the Code.

Although we have commenced our review, due to the complexity and volume of changes required, we intend to undertake a phased compliance approach. Full compliance with the Code is expected, to the extent that it is in the best interests of members and consistent with the law, by the dates outlined in the table below.

Standards in the Code	How we'll comply	Target compliance date*	Status/Update
<b>Benefit design and premiums</b> (sections 4.1 to 4.17)	We have an insurance strategy, as required under superannuation law. We'll review and update our insurance strategy for the requirements of the Code. For automatically insured members, in assessing the level and type of cover provided, we'll consider several factors including member demographics, salary (actual or estimated) and how insurance premiums from super may reduce the money a member has to live on when the time comes to retire.	31 Dec 20	<ul style="list-style-type: none"> <li>Under review with full implementation to be aligned with pending Code requirement changes to section 4</li> </ul>
<b>Automatic end of cover and reinstatement</b> (sections 4.25(e) and (f), 4.27, 4.28-4.30)	These standards apply to automatic insurance members. We'll review our current end of cover processes and make amendments to meet the requirements of these standards. We believe potential changes to legislation commencing on 1 July 2019 will prevail over these standards.	31 Mar 20	<ul style="list-style-type: none"> <li>Protecting Your Super ('PYS') legislation commenced <u>1 July 2019</u> now superseded these standards.</li> <li>Putting Members' Interests First changes commence 1 April 2020</li> <li>90 days reinstatement option now available on all group insurance arrangements</li> </ul>
<b>Cancelling cover, communications about lack of contributions and duplicate cover</b> (sections 4.18 to 4.24, 4.25 (a) to (d) and (g), 4.26)	We'll review our current processes for cancelling insurance cover, communicating to members about not adding money (super contributions) and identifying whether members have duplicate insurance cover within the CSRF. We'll enhance our processes, and implement new ways, to meet the requirements of these standards.	30 Jun 20	<ul style="list-style-type: none"> <li>Protecting Your Super ('PYS') legislation commenced <u>1 July 2019</u> now supersedes lack of contribution standards.</li> </ul>
<b>Helping members make informed decisions</b> (section 5)	We'll review the quality and content of our current communications, and will create new communications, to meet the requirements of the standards to better help members make informed decisions.	30 Jun 20	<ul style="list-style-type: none"> <li>Under review</li> </ul>
<b>Supporting vulnerable customers</b> (section 6)	We'll review our current processes for supporting vulnerable members. We'll enhance our processes and implement new ways to meet the requirements of the standards to support members.	30 June 20	<ul style="list-style-type: none"> <li>Under review with full implementation to be aligned with Code Owners finalisation of vulnerable consumer policy</li> </ul>
<b>Handling claims</b> (section 7)	We'll review our current claims handling processes. We'll then enhance the way we do things with new processes to ensure we meet the requirements of the standards for handling claims. We'll also publish our claims philosophy on our website.	30 Jun 20	<ul style="list-style-type: none"> <li>Under review with full implementation to be aligned with changes required for vulnerable consumer in section 6</li> </ul>

<b>Standards in the Code</b>	<b>How we'll comply</b>	<b>Target compliance date*</b>	<b>Status/Update</b>
<b>Premium adjustments</b> (section 8)	We'll publish on our website any material benefits received from our insurer or any premium adjustment payments (if applicable).	30 Jun 19	• Not applicable to this fund
<b>Promoting our insurance cover</b> (section 9)	We'll review our insurance communications to ensure they meet the requirements of the standards in promoting insurance cover.	31 Dec 20	• Under review
<b>Changes to cover</b> (section 10)	We'll review our current processes to ensure they meet the requirements of the standards for changes to insurance cover.	30 Jun 20	• Under review
<b>Refunds</b> (section 11)	We'll review our current refund policies. We'll enhance our processes and implement new ways to meet the requirements of the standards for refunds.	30 Jun 20	• Under review
<b>Staff and Service Providers</b> (section 12)	We'll review our processes for the appointment and monitoring of staff and service providers. We'll enhance our processes and negotiate with our service providers where required to comply with the standards about staff and service providers.	30 Jun 20	• Under review
<b>Making enquiries and complaints</b> (section 13)	We'll review our enquiries and complaints handling processes and will make changes to meet the standards around enquiries and complaints.	30 June 20	• Under review with full implementation to be aligned with changes required for vulnerable consumers in section 6
<b>Promoting, monitoring and reporting on the Code</b> (section 14)	We'll prepare systems and processes to enable compliance with promoting, monitoring and reporting on the Code.	31 Dec 20	• Under review

\*Changes to regulations or law may impact the target compliance dates. If required, we will update our transition plan accordingly.

*Equity Trustees Superannuation Limited (ETSL)(the Trustee) is the Registrable Superannuation Entity Licensee for the Colonial Super Retirement Fund.*