Vanguard **Super**

Vanguard

Complaints Handling Policy

External

Vanguard Super Pty Ltd.

ABN 73 643 614 386

October 2025

We are committed to delivering exceptional client service and care to you, including the resolution of Complaints in a fair, equitable and timely manner. We take all Complaints seriously. We handle your concerns confidentially, respectfully and with professionalism.

How to make a Complaint

If you have a Complaint about any Vanguard Super products or services, you should contact our Client Services Team and tell us about your Complaint so we can work together towards a resolution. You can lodge a Complaint via the following methods:

Phone: 1300 655 101 (between 8am to 6pm Monday to Friday AET)

Secure message: via Vanguard Online account

Mail: Vanguard Super
PO Box 18031
Collins Street East VIC 8003
Email: complaints@super.vanguard.com.au

Complaints about insurance in superannuation may be lodged with us via any of the above methods, or with our insurer, AIA Australia Limited, directly.

To lodge a Complaint with AIA Australia Limited, please email your Complaint to: au.customerresolutions@aia.com

We can accept a Complaint made by a representative on your behalf, where you have authorised the representative to act for you. If you require any assistance to lodge a Complaint or during the resolution process, please contact our Client Services Team on 1300 655 101.

There are also a range of accessibility options and this Policy, upon request, can be made available in large print and in other languages.

A "Complaint" is:

> an expression of dissatisfaction made to or about Vanguard Super, related to its products, services, staff or the handling of a Complaint, where a response or resolution is explicitly or implicitly expected or legally required.

We do not deal with the following issues under this Policy:

- Employee/employment related complaints or grievances or work-related problems raised by staff.
- Simple requests for information.
- Comments made about us where a response is not required such as feedback provided in survey.
- Complaints commenced by litigation.
- Whistle-blower incidents.

You can lodge a Complaint if you are:

- a member or former member of Vanguard Super.
- an employer making contributions on behalf of a member of Vanguard Super.
- an authorised third party or Power of Attorney, acting on the behalf of a member or former member of Vanguard Super.
- a person acting for the estate of a member or former member of Vanguard Super.
- a person with an interest in a death benefit.
- a party (and intending party) to an agreement under the *Family Law Act 1975* or order affecting superannuation.

What information do you need to provide with your Complaint?

When you lodge your Complaint, please provide us with:

- your full name and contact details.
- your Vanguard Super Member number (if available).
- details of your Complaint, and where possible, provide a timeline of events.
- copies of any supporting documents in relation to your Complaint.
- your suggestions for how you would like us to resolve your Complaint.
- your preferred method of communication.

Providing us with as much supporting information as you can, will help us resolve your Complaint as quickly as possible.

Internal Dispute Resolution (IDR) Process

Acknowledgment

When you lodge your Complaint, we will acknowledge it, generally within one to two business days. Acknowledgment may be verbally or in writing. We understand your time is valuable, so we are keen to act promptly and respond as soon as possible.

Investigation and Assessment

Our Client Services Team will try and resolve your Complaint at the initial point of contact with you. However, we know that this is not always possible. Where it is not possible, our Complaints Team will undertake a comprehensive investigation. We will keep you informed of the progress of your Complaint and may contact you for further information to assist with our investigation.

Providing you with the outcome ("Response")

If your Complaint is resolved within five (5) business days, we may not provide you with a written IDR Response.

For all other complaints, we will provide you with a written response setting out the outcome of your Complaint.

The following timeframes apply for providing you with our response:

- for a Complaint not related to a superannuation death benefit distribution – no later than 45 calendar days after receiving the Complaint.

- for a superannuation death benefit distribution Complaint – no later than 90 calendar days after the expiry of the 28-calendar day period for objecting to a proposed death benefit distribution (the government regulated death benefits complaints procedure is explained in the section below on *Complaints about proposed superannuation death benefit distributions*).

Our response will advise you of your right to take your Complaint to the Australian Financial Complaints Authority (AFCA) if you are not satisfied with the outcome, along with the contact details of AFCA (refer to page 4 for more information about AFCA).

If any part of your Complaint is rejected, we will give you the reasons for our decision.

If there is a delay - Delay notice

In limited circumstances, we may not be able to send your Response within the 45 or 90 calendar day timeframe above.

This may occur if:

- resolution of the Complaint is particularly complex; or
- circumstances beyond our control are causing Complaint management delays.

If there is going to be a delay, we will give you a "Delay notice" that informs you about the reasons for the delay, your right to make a Complaint to AFCA if you are dissatisfied, and the contact details of AFCA. We will keep you up to date and remain in contact with you until we have an outcome for you.

Complaints about proposed superannuation death benefit distributions

If you object to, or have a Complaint about, the initial proposed payment of a death benefit, you must object to us within 28 calendar days of being notified of the initial proposed death benefit distribution (this is referred to as the "28-day objection period").

An objection will be treated as a complaint and will trigger the start of our IDR Process. If a person objects to an initial proposed death benefit distribution, we will provide the Response within 90 calendar days from the end of the 28-calendar day objection period. However, if in response to the initial objection we provide a further proposal for the payment of the death benefit, another 28-day objection period will start, and we will provide the Response within 90 calendar days from the end of that new 28-calendar day objection period. This will repeat with each new payment proposal until we make a final decision.

We will give written reasons for our decision regarding a superannuation death benefit payment to you, as well as non-complaining potential beneficiaries, subject to any privacy and confidentiality requirements.

Refer to the section below on External Dispute Resolution for more details about death benefit distribution complaints to AFCA.

Privacy Complaints

Complaints about the collection, use or disclosure of your personal information are handled differently to superannuation and death benefit complaints. We will seek to provide an IDR Response to these complaints as soon as practicable and, in general, no later than 30 days.

If you are not happy with the outcome of your Privacy complaint, the matter may be referred to the Office of the Australian Information Commissioner (OAIC). The OAIC may be contacted at www.oaic.gov.au or by phone at 1300 363 992.

Please refer to the Vanguard Australia Privacy Policy available on the Vanguard Super website for further information about our privacy complaints process.

External Dispute Resolution (EDR)

If you are not satisfied with the outcome of your Complaint, or if you have not received a response within the above timeframes, you may take your Complaint to AFCA.

AFCA is an independent external body, whose role is to assist consumers and small businesses to reach agreements with financial firms about how to resolve their Complaints. If a Complaint is not resolved under our Dispute Resolution Process, AFCA will decide an appropriate outcome. AFCA provides a free service.

You can make a Complaint to AFCA online, by letter, email, or by phone.

AFCA's contact details are:

Website: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Mail: Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

There are specific rules around who can make a superannuation Complaint. AFCA will let you know if your dispute falls within its rules and whether they are able to review it. If it is outside AFCA's rules, you can seek independent legal advice or any other external dispute resolution options that may be available to you.

If you lodge your Complaint directly with AFCA before you have raised it with us, AFCA will generally refer your Complaint to us to consider within timeframes specified by AFCA.

It is important to note that time limits apply to some types of Complaints lodged with AFCA.

If you require a hard copy version of this Policy, please contact us and we will provide you with one.

Information about IDR process is also available in a range of Vanguard Super disclosure materials including the , Product Disclosure Statements and Periodic Statements (including exit statements). You can also find out more information about our IDR process by contacting our Client Services Team on 1300 655 101.