

LEGAL & REGULATORY UPDATE

PENSIONS AND SUPERANNUATION

INSIDE THIS EDITION

- ASIC Product Intervention Power
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- Early Release Scheme




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IN BRIEF

*A busy month from both Parliament and the regulators has brought a financial year which turned out quite different to what anybody could have expected to a close. Parliament passed laws which were largely technical in nature (the **2019 Measure No. 3 Bill** really is one for superannuation policy works).*

*We also saw the **More Flexible Superannuation, Your Super, Your Choice, and Reuniting More Superannuation Bills** all stuck in Parliament to be considered in August.*

*Regulators have started to focus on post-pandemic matters, with important guidance on ASIC's **Product Intervention Power** released, and guidance on **Internal Dispute Resolution** and the **Design & Distribution Obligations** expected soon.*

*There was also plenty more to keep technocrats busy, with a swathe of technical instruments related to the **Superannuation Guarantee, Term Allocated Pensions and supervisory levies** also released.*

MAJOR UPDATES



Parliamentary Agenda & Sittings

30 June 2020
Parliamentary
business

Parliament sat between 10 to 18 June before going into recess until 4 August. There were a couple of superannuation related Bills which managed to pass into law:

- [Treasury Laws Amendment \(2019 Measures No.3\) Bill 2019](#)
- [Superannuation Supervisory Levy Imposition Amendment Bill 2020](#)

There were also important superannuation related Bills which failed to pass before 30 June or did not make it onto the Parliamentary agenda. There are likely to be some amendments to the following Bills in relation to commencement dates:

- [Treasury Laws Amendment \(Reuniting More Superannuation\) Bill 2020](#)
- [Treasury Laws Amendment \(More Flexible Superannuation\) Bill 2020](#)
- [Treasury Laws Amendment \(Your Superannuation, Your Choice\) Bill 2019](#)
- [Family Law Amendment \(Western Australia De Facto Superannuation Splitting and Bankruptcy\) Bill 2019](#)

Superannuation trustees should note the status of these Bills, and revise any implementation planning to ensure that adequate resources are in place to implement if passed into law.



Product Intervention Power (RG 272)

17 June 2020
Regulatory Guide

[LINK TO DETAILS](#)

ASIC released a new regulatory guide on the administration of its product intervention power – *Regulatory Guide 272*. The power enables ASIC to make a product intervention order when it determines that a financial product, such as a superannuation product, (or class of products) has resulted in, or is likely to result in significant consumer detriment.

The guidance highlights that ASIC can exercise this power whether or not there has been a breach of the law, i.e. even if a person has complied with disclosure requirements and approaching design and distribution obligations of the *Corporations Act*.

The RG 272 sets out:

- The scope of power, including the types of orders ASIC may consider making;
- When and how ASIC may exercise the power, including how it may determine when consumer detriment is significant and how it may intervene;
- The process for making an intervention order, including how ASIC may consult with affected parties when an order will commence, the process by which an order can be extended, amended or revoked, and the consequences of breaching an order.

Superannuation trustees should ensure that employees involved in the design, distribution, and management of products are aware of the circumstances in which ASIC may use its intervention power to protect consumers and ensure that risks associated with product intervention (and consumer detriment) are appropriately managed.



Internal Dispute Resolution

25 June 2020
Legislative Instrument

[LINK TO DETAILS](#)

ASIC made *ASIC Corporations, Superannuation and Credit (Amendment) Instrument 2020/99*, which amends *ASIC Corporations and Credit (Internal Dispute Resolution - Transitional) Instrument 2019/965* to preserve ASIC's existing internal dispute resolution policy in relation to complaints received by financial firms (including superannuation trustees) before 5 October 2021.

The transitional instrument preserved the existing internal dispute resolution policy through a single instrument for a short transitional period, until 30 June 2020, pending the expected finalisation of ASIC's new internal dispute resolution standards and requirements.

The release of ASIC's new internal dispute resolution standards and requirements was delayed due to the impacts of the pandemic. ASIC has announced that the new standards and requirements will be publicly released in July 2020 and will apply to complaints received on or after 5 October 2021.

Superannuation trustees should update their transition planning to implement the new regime from 5 October 2021. Complaint handling functions should also be made aware of the new transition dates and expected release of information in July 2020.



ASIC Revised Timetable of Ongoing Work

11 June 2020
Update

[LINK TO DETAILS](#)

ASIC released a revised timetable of ongoing work as part of its [Interim Corporate Plan for 2020-21](#), that includes important updates:

- **Royal Commission Recommendations:** ASIC will consult in late 2020 on changes to *Regulatory Guide 38 The hawking prohibitions* to expand the hawking prohibition to superannuation and insurance products, and will release an update to *Regulatory Guide 245 Fee disclosure statements* and make the relevant legislative instruments in December 2020, subject to passage of legislation. Also, in Q1 and Q2 2021, respectively, ASIC intends to consult on an update to *Regulatory Guide 78 Breach reporting by AFS licensees* and a draft update to *Regulatory Guide 183 Approval of financial services sector codes of conduct*.
- **Internal Dispute Resolution:** ASIC will publish *RG 271 Internal dispute resolution*, outlining updated IDR standards and requirements in July 2020 to allow industry to make the necessary changes ahead of commencement on 5 October 2021.
- **Design and Distribution:** ASIC plans to publish regulatory guidance on product design and distribution obligations in Q3 2020, responding to industry requests for guidance to be finalised as soon as possible.
- **Insurance in Super:** ASIC is continuing work and anticipates being in a position to publish a report by December 2020.
- **Product Intervention:** ASIC will publish a regulatory guide in June 2020 on how it will use the product intervention power.

Superannuation trustees should note the revised implementation timelines for these key activities and reforms.



Jobkeeper & SG

2 June 2020
Regulations made

[LINK TO DETAILS](#)

Treasury made the *Superannuation Guarantee (Administration) Amendment (Jobkeeper Payment) Regulations 2020*, a couple of months after announcing the JobKeeper package as part of the economic response to the coronavirus related pandemic.

The initial announcement didn't shed much light on how the JobKeeper subsidy for wages and employee support would interact with obligations that employers have to contribute to a superannuation fund for the benefit of their employees.

The announcement simply stated that "no superannuation guarantee payments are required to be paid on any additional payment made because of the JobKeeper Payment."

The Regulations provide clarity, in that salary or wages that do not relate to the **performance of work** and are only paid to an employee to satisfy the wage condition for getting JobKeeper payment are prescribed as excluded salary or wages for the purposes of calculating the SG Charge Shortfall Amount.

Importantly, performance of work includes employees on paid leave.

Superannuation trustees which receive employer contributions under a contractual, modern award or other arrangement should consider ensuring that any contributions payable which exceed those payable under the SG law. Close attention may also be warranted where a total remuneration package is referred to in such arrangements.



TECHNICAL CHANGES AND UPDATES



Protecting Your Super & Putting Members' Interests First

22 June 2020
Royal Assent

[LINK TO DETAILS](#)

The *Treasury Laws Amendment (2019 Measures No. 3) Bill 2019* received royal assent, making a range of technical amendments, including in relation to the *Protecting Your Superannuation Package* and *Putting Members Interests' First* reforms. The amendments include:

- expanding the **application of the fee cap** in s 99G(1)(b) of the Superannuation Industry (Supervision) Act 1993 (SIS Act) to include when a member ceases holding the product part way through the fund's income year where the balance of the product is less than \$6,000;
- amending sections 16, 20QB and 24C of the *Superannuation (Unclaimed Money and Lost Members) Act 1999* to remove the requirement for **lost member reporting** to the ATO of information about money that ceases to be unclaimed or accounts that cease to be in-active low balance or lost member accounts during the period;
- amending the definition of '**inactive low balance account**' so that an account is not an 'inactive low balance account' if the member has elected to maintain insurance on that account by making an election under subsection 68AAA(2) of the SIS Act on or after 30 June 2019;
- providing that a **member election** that the account is not an inactive lost account is to be made to the trustee rather than the Commissioner. The exception is amended so that the member makes this election directly to the superannuation provider rather than the ATO;
- providing a new way of calculating the debit which arises in a member's **transfer balance account** when a member commutes a market linked pension which is a capped defined benefit income stream (for which the ATO has issued [CRT Alert 031/2020](#) with more guidance).

Superannuation trustees are unlikely to be required to make many substantive changes arising from PYSP and PMIF technical changes. Trustees should, however, review the ATO's CRT alert to ensure that information already reported to the ATO is accurate or whether an amendment is necessary.



APRA Industry Funding Bill

22 June 2020
Bill passed

[LINK TO DETAILS](#)

The *Superannuation Supervisory Levy Imposition Amendment Bill 2020* received royal assent, which amends the *Superannuation Supervisory Levy Imposition Act 1998* to increase the statutory upper limit on the amount of levies APRA can collect from the entities it prudentially regulates.

The statutory upper limit has been increased from \$1.5 million to \$10 million to provide APRA with the flexibility to continue to have its activities fully funded by regulated entities.

The Levy Imposition Amendment Bills also make amendments to how the indexation factor used to index the statutory upper limit is calculated, moving from annual CPI based calculations to quarterly CPI based calculations.

Superannuation trustees should ensure that financial budgets provision for the payment of APRA Levies.



APRA Supervisory Levies Determination

30 June 2020
Determination

[LINK TO DETAILS](#)

APRA made the *Australian Prudential Regulation Authority Supervisory Levies Determination 2020* to recover costs of regulating industries that are prudentially regulated by APRA.

The determination commences on 1 July 2020 and relates to the 2020-21 financial year. Part 9 of the determination relates to levy imposed by the *Superannuation Supervisory Levy Imposition Act 1998* on superannuation entities. For most APRA regulated superannuation funds (excluding pooled superannuation trusts), the levy is determined by reference to:

- ▶ A restricted levy amount of 0.003% of the fund asset value at 30 June 2020 (with a minimum of \$5,000 and maximum of \$600,000; and
- ▶ An unrestricted levy amount of 0.003154% of the fund asset value at 30 June 2020.

Superannuation trustees should ensure that financial budgets provision for the payment of APRA Levies at the levels determined in accordance with the instrument.



Aged Care Bonus & SG

25 June 2020
Regulations made

[LINK TO DETAILS](#)

Treasury made the *Superannuation Guarantee (Administration) Amendment (Aged Care Retention Bonus) Regulations 2020*, amending the *Superannuation Guarantee (Administration) Regulations 2018* to ensure that an employer is not required to make additional superannuation contributions as a result of a bonus payment paid to an employee under the Aged Care Workforce Retention Grant Opportunity (the Grant).

The Regulations achieve this by exempting payments made to an employee under the Grant from being included in the "salary or wages" that are used to calculate an employer's superannuation guarantee charge.

Superannuation trustees should ensure that member and employer service representatives are aware of the treatment and equipped to respond to queries that members or employees may have in relation to superannuation guarantee and the bonus.



Adviser CPD Extension

26 June 2020
Regulations made

[LINK TO DETAILS](#)

The Financial Adviser Standards and Ethics Authority (FASEA) has outlined its intention to grant advisers an additional 3 months to meet the 40-hour CPD requirement. It released draft *Corporations (Relevant Providers Continuing Professional Development Standard) Determination (Amendment) 2020* for consultation to give effect to the extension.

This 3-month extension is a one-off recognition of the difficulties faced by advisers this year. Advisers will be required to complete 40 hours of CPD in 12 months in future CPD years and may not double count hours across the years.

FASEA nonetheless encourages advisers to utilise effective solutions being offered by Licensee CPD programs that contain online learning as part of a led or conducted CPD program. Video conferencing and/or webinar technology options are equally considered appropriate alternatives to face to face offerings.

Superannuation trustees should consider reviewing financial advice CPD policies and procedures to reflect the extension, and ensuring that any employees or representatives required to comply with the CPD requirements are aware of the planned extension.



Financial Advice Relief End Date

11 June 2020
Legislative
Instrument

[LINK TO DETAILS](#)

ASIC had previously registered [ASIC Corporations \(COVID-19—Advice-related Relief\) Instrument 2020/355](#) which includes three temporary relief measures to assist the provision of affordable and timely advice during the COVID-19 pandemic.

It issued a temporary no-action position for superannuation trustees to expand the scope of personal advice that may be provided by, or on behalf of the trustee as intra-fund advice; replaced the 5 business day *Statement of Advice* requirement with up to 30 business days; and permitted registered tax agents to give advice to existing clients about early access to superannuation without needing to hold an AFS Licence.

The relief is temporary and subject to conditions, including the requirement that a record of advice is provided, the advice fee is capped at \$300 and the client approached the advice provider for advice and the advice provider determined that the client is entitled to the early release payment.

[ASIC Corporations \(Amendment\) Instrument 2020/565](#) was made and amends the *ASIC Corporations (COVID-19 - Advice-related Relief) Instrument 2020/355* to specify that the temporary measures will cease to operate six months after they commenced (2 October 2020)

Superannuation trustees should consider reviewing financial advice activities, business rules and conversation guides to ensure compliance with the temporary relief and transition at the end of the relief.



Consumer Data Right

18 June 2020
Legislative
Instrument

[LINK TO DETAILS](#)

The ACCC has made *Competition and Consumer (Consumer Data Right) Amendment Rules (No. 1) 2020* amending the *Competition and Consumer (Consumer Data Right) Rules 2020* to clarify the intended operation of particular rules and to ensure appropriate alignment of rules with the technical data standards prior to the commencement of consumer data sharing (for banking) on 1 July 2020.

The amendments clarify that the accounts in scope from 1 July 2020 are those held by individual account holders. This includes simple small business accounts held by an individual account holder (such as those held by sole traders).

Other amendments expressly recognise that a data holder may refuse to seek authorisation or refuse to disclose CDR data in respect of a blocked or suspended account.

The Rules have also been amended to provide greater flexibility in relation to the methods provided to consumers to enable them to communicate withdrawal of consent or authorisation.

Superannuation trustees that are already or intending on registering as data recipients under the CDR regime should ensure that systems and procedures align with the revised rules.



Market-linked Income Stream Draw Down Flexibility

25 June 2020
Legislative
Instrument

[LINK TO DETAILS](#)

The *Social Security Legislation Amendment (Measures No. 1) Determination 2020* amends the *Social Security (Asset test Exempt Income Stream (Market-linked) – Payment Factors) Principles 2017* and repeals the *Social Security (Retention of exemption for asset-test exempt income streams) (DEEWR) Principles 2011 (No. 1)*.

The amendments form part of the Coronavirus related relief package which allows members to adjust their minimum draw down thresholds.

The determination provides that for the financial years commencing on 1 July 2019 and 1 July 2020, the payment factor for working out the minimum amount payable in that financial year for an income stream is to be double the relevant payment factor specified in the table at section 4 of the Payment Factors Principles.

Doubling the payment factor to be applied to working out the minimum drawdown amount, effectively halves the minimum drawdown required from an income stream in order to maintain grandfathered status for the relevant financial years. The grandfathered status is relevant is maintaining exemptions to age pension means testing in relation to market linked income streams.

Superannuation trustees that provide market-linked income streams (sometimes referred to a Term Allocated Pensions) should ensure that administration systems are configured to enable the flexibility in minimum draw down threshold amounts.



GUIDANCE AND POLICY



Executive Variable Pay

212 June 2020
Information Sheet

[LINK TO DETAILS](#)

ASIC published information sheet INFO 245 that sets out practical guidance to support board oversight and the exercise of discretion on the variable pay outcomes of large listed companies' most senior executives (cash and/or equity).

However, noted that governance is scalable and many remuneration governance principles can be adopted by a broader range of listed companies and in any market.

The information sheet focuses on:

- The importance of a robust remuneration governance framework; and
- Specific factors to consider when exercising discretion on executive variable pay in the current environment.

Superannuation trustees should review the information paper and consider its relevance as related to any review of internal remuneration governance structures in advance of the Financial Accountability Regime provisions.



Coronavirus Early Release Integrity & Compliance

18 June 2020
Guidance

[LINK TO DETAILS](#)

The ATO provided information on its integrity and compliance priorities related to the COVID-19 Early Release Scheme. The ATO notes that it will take action where people deliberately exploit the system, including:

- Revoking its determination where persons cannot demonstrate eligibility meaning that the early release of super will become assessable income and need to be included in a member's tax return;
- Penalties of more than \$12,000 for providing false or misleading information;
- Application of the general anti-avoidance rule for income tax for those entering into the scheme mainly for the purpose of obtaining a tax benefit resulting in potential cancellation of the tax benefit obtained, administrative penalties and interest charges.

The ATO points out that it relies on data from Single Touch Payroll, income tax returns, information reported by super funds and third-party agencies such as Services Australia and Home Affairs to check claims.

In some cases, the ATO is stopping applications and preventing super money from being released and in others, reviewing circumstances after an application is processed to ensure the integrity of the program.

Superannuation trustees may wish to update any member guidance and communications in relation to the early release scheme to ensure that the obligations in making early release applications is clear and balanced.



ASIC FAQ Update

22 June 2020
Update

[LINK TO DETAILS](#)

ASIC updated its COVID-19 – Information for superannuation trustees FAQ to include information on regulatory issues that have arisen from COVID-19. FAQ 1F. *How should trustees communicate with members about the Government's temporary reduction to minimum drawdown rates for the 2020-21 financial year* was added, detailing that trustees should contact affected members directly with clear information about the change and the trustee's implementation approach as well as a factual explanation of the changes to the rates, the member's current drawdown instructions, what will happen to the member's pension payments in 2020-21, and how members can change their current instruction.

FAQ 2D. *How can I find out about how COVID-19 has affected other ASIC activities* has been updated to specify that superannuation trustees should refer to ASIC's revised timetable, specifically as related to IDR, design and distribution and insurance in superannuation.

Superannuation trustees should review their communications strategy to ensure the information detailed by ASIC is communicated to income product members.



Pandemic Data Collection

24 June 2020
Letter to RSEs

[LINK TO DETAILS](#)

APRA wrote to RSE licensees about the release of its COVID-10 Pandemic Data Collection (PDC) that is intended to enable ongoing assessment of the impact of COVID-19 on the superannuation industry and the outcomes being delivered to members. A review of the continued need for the PDC will occur in late September 2020.

The purpose of the PDC is to:

- provide APRA with enhanced data surrounding the early release of superannuation, enabling analysis of impacted demographics;
- provide APRA and ASIC with monthly data on complaints, member accounts with insurance that have been cancelled, insurance claim activity and intra-fund advice provided;
- provide APRA with quarterly data on investment options, foreign currency exposure and hedging, and member switching; and
- allow APRA to understand the impact of the COVID-19 pandemic on the superannuation industry and provide reporting to the Government and other agencies.

The PDC comprises two components: information required to be reported (1) monthly covering complaints, insurance, advice and operational resilience (due 31 July 2020 covering the period of April-June 2020); and (2) quarterly, covering liquidity, early release demographics and a one-off collection of insurance cancellations relation to the Protecting Your Super Reforms (also due 31 July 2020).

Superannuation trustees should consider their depth and breadth of data and implementation timeframes, and provide any feedback to APRA, which can be sent to covid19superdata@apra.gov.au.



ASIC Relief

23 June 2020
Letter to RSEs

[LINK TO DETAILS](#)

ASIC issued its report *Overview of decisions on relief applications (October 2019 to March 2020)* REP 664, outlining decisions on relief applications and highlighting ASIC's efforts to reduce red-tape and achieve a practical, positive outcomes for companies seeking regulatory flexibility, without harming stakeholders.

ASIC can modify or set aside certain provisions of the *Corporations Act*, including Chapters 2D (officers and employees), 2G (meetings), 2M (financial reporting and audit), 5C (managed investment schemes), 6 (takeovers), 6D (fundraising) and 7 (financial services). In limited situations, ASIC may also consider providing a no-action letter when instances of non-compliance with certain statutory provisions have been brought to ASIC's attention.

An example of relief provided to superannuation funds included the granting of disclosure relief for a proposal to transfer members' superannuation benefits between two superannuation funds with different trustees (where the transfer was to occur within the same corporate group) in circumstances where there was no legal requirement to obtain the members' consent. There was also to be no change in the administration system or manner in which members' superannuation benefits would be administered and the circumstances were similar to those of the previous relief decision.

Relief was provided from the requirement that the trustee give members a PDS relating to the transferee fund and the requirement to provide members with an exit statement after the transfer. Conditions were, however, imposed.

Superannuation trustees should review ASIC's relief scenarios and consider engaging with ASIC if similar scenarios present themselves or relief seems appropriate.



Timing of Employer Contributions

3 June 2020
Practical Compliance
Guidance

[LINK TO DETAILS](#)

The ATO issued *Practical Compliance Guideline PCG 2020/6* which addresses inconsistencies in the timing of income tax deductions for superannuation contributions made through the Small Business Superannuation Clearing House (SBSCH) and with the timing of employer contributions for the purposes of the superannuation guarantee obligation regime.

The inconsistency relates to the fact that the Income Tax Assessment Act 1997 considers a contribution to have been made for the purpose of claiming deductions when it is received by the SBSCH, while the contribution is considered to have been made for the purpose of determining the SG Charge Amount once it is received by the trustee of the superannuation fund.

The ATO has stated that it will not apply compliance resources to consider whether the contributions made were received by the trustee of the superannuation fund in the same income year in which the contribution was made to the SBSCH, provided the payment was made to the SBSCH before close of business on the last business day on or before 30 June.

Superannuation trustees may wish to ensure that employer service and relationship functions are aware of the issue, guidance, and compliance approach should any queries be raised by contributing employers.



ASIC Cost Recovery Implementation

12 June 2020
Update

[LINK TO DETAILS](#)

ASIC published its draft Cost Recovery Implementation Statement (CRIS) 2019-20, detailing ASIC's actual regulatory costs for 2018-19 and providing an estimate of costs for 2019-20.

The CRIS lays out an amount of \$48.928 million in cost recovery levies and \$15.432 million in statutory levies for a total levy for the Investment Management, superannuation and related services sector of \$64.360m.

All superannuation trustees will pay a minimum levy of \$18,000. Where the total value of assets in all registrable superannuation entities operated by the trustee exceeds \$250 million, that trustee will have to pay a graduated levy amount, which will equal the value of assets in all registrable superannuation entities operated by the trustee as a proportion of the total value of assets in all entities in the subsector above the \$250 million threshold. To avoid double counting of assets, the total value of assets will not include any assets that are an interest in another registrable superannuation entity operated by the trustee. Employer-sponsored receivables are also excluded from total assets for the purposes of calculating the levy.

Final levies to be paid will be based on actual costs, however, and will be published in December 2020 and invoiced in January 2021. The feedback period for comments on the statement has been extended over the next six weeks until 24 July 2020.

Superannuation trustees should review the CRIS to get an indication of what levies to expect and ensure that appropriate amounts are included in budgets.



SMSF Maximum Membership & Exempt Income

18 June 2020
Legislative Instrument

[LINK TO DETAILS](#)

The Assistant Treasurer announced a policy of revised start dates for several technical superannuation and taxation measures relevant to superannuation fund trustees.

- increasing the maximum number of allowable members in self-managed superannuation funds and small APRA funds from four to six commencement deferred from 1 July 2019 to Royal Assent of the enabling legislation; and
- previously announced changes to the requirements for actuarial certificates for funds with only exempt current pension income, and simplification of the proportioning rules commencement date has been deferred from 1 July 2020 to 1 July 2021.

The revisions were described as a result of the reprioritisation of Government resources and the shortened parliamentary sitting period in 2020 due to the Coronavirus-related pandemic.

Superannuation trustees should revise implementation planning to account for these changes, noting that these reforms were likely to have the greatest impact on trustees of self-managed superannuation funds.

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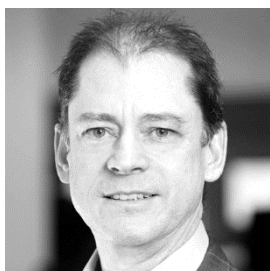
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