

## Sunsuper -Breaches and Incidents since 2008

| Year | # Breaches/Incidents Recorded   | Detail of Reportable Breaches   | Reportable Breach by Type/Cause   |
|------|---|---|---|
| 2008 | No record of reportable breaches<br><br># Incidents - 116<br># Breaches - 104 | NA  | NA  |
| 2009 | 3 reportable breaches<br><br># Incidents - 121<br># Breaches - 97             | <ul style="list-style-type: none"> <li>• BAS- Sunsuper Gross Income Understated- reported to the ATO</li> <li>• Approx. 84 rollovers into Sunsuper not processed within legislative timeframe (admin error coding payments)</li> <li>• Delay in allocating contributions from online payment system to member accounts outside legislative timeframe</li> </ul> | <ul style="list-style-type: none"> <li>• ATO Reporting Error - 1</li> <li>• Admin. Errors (Delays) - 2</li> </ul>   |
| 2010 | 2 reportable breaches<br><br># Incidents - 95<br># Breaches - 145             | <ul style="list-style-type: none"> <li>• Member future investment choices not correctly applied - systemic, multiple instances of similar issues occurring over time</li> <li>• Delay in allocating contributions from online payment system to member accounts outside legislative timeframe</li> </ul>  | <ul style="list-style-type: none"> <li>• Admin. Error (System) - 1</li> <li>• Admin. Error (Delays) - 1</li> </ul>  |
| 2011 | 4 reportable breaches<br><br># Incidents - 113<br># Breaches - 207            | <ul style="list-style-type: none"> <li>• Incorrect taxation of anti-detriment benefits in respect of members - reported to the ATO</li> <li>• Significant Event Notice Disclosure outside legislative timeframe - due to floods</li> <li>• Incorrect set up of custodian arrangement with an investment manager</li> </ul>                                      | <ul style="list-style-type: none"> <li>• Admin. Error (System) - 1</li> <li>• Disclosure (Timeframe) - 1</li> <li>• Custodian Arrangements - 1</li> <li>• Licence Conditions - 1</li> </ul> |

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|             |  | <ul style="list-style-type: none"> <li>Failure to notify ASIC of a director change of address</li> </ul>  |   |
| <b>2012</b> | 5 reportable breaches<br># Incidents - 147<br># Breaches - 123 | <ul style="list-style-type: none"> <li>Unit Price Error - Property Option</li> <li>Incorrect set up of custodian arrangement - delays in transferring some investments - (2)</li> <li>External Clearing House advised Sunsuper that it had discovered un-presented cheques from employers in respect of member contributions</li> <li>Unit Price Error - Cash Option</li> </ul> | <ul style="list-style-type: none"> <li>Unit Pricing - 2</li> <li>Custodian Arrangements - 2</li> <li>Admin. Error - 1</li> </ul>        |
| <b>2013</b> | 2 reportable breaches<br># Incidents - 117<br># Breaches - 146 | <ul style="list-style-type: none"> <li>Incorrect Eligible Start Date Used for Claim payments</li> <li>Inconsistent application of effective date for online/BPay contributions</li> </ul>   | <ul style="list-style-type: none"> <li>Admin. Error (System) - 2</li> </ul>   |
| <b>2014</b> | 3 reportable breaches<br># Incidents - 92<br># Breaches - 213  | <ul style="list-style-type: none"> <li>SuperStream - breach of 3 day rollover timeframe requirements</li> <li>Incorrect set up of investment</li> <li>Incorrect Unit Price applied to rollins</li> </ul>  | <ul style="list-style-type: none"> <li>Unit Pricing - 1</li> <li>Admin. Error (Delay) - 1</li> <li>Admin. Error (System) - 1</li> </ul> |
| <b>2015</b> | 3 reportable breaches<br># Incidents - 47<br># Breaches - 106  | <ul style="list-style-type: none"> <li>Disclosure failures re: corporate plans - product changes not posted to website (2)</li> <li>SuperStream contributions not processed within 3 days</li> </ul>  | <ul style="list-style-type: none"> <li>Disclosure (Website) - 2</li> <li>Admin. Error (Delay) - 1</li> </ul>                            |
| <b>2016</b> | 2 reportable breaches  | <ul style="list-style-type: none"> <li>Inappropriate segregation of duties in processing</li> </ul>   | <ul style="list-style-type: none"> <li>Admin. Error (System) - 1</li> </ul>   |

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|             | # Incidents - 251<br># Breaches - 277                          | system<br><ul style="list-style-type: none"> <li>• Failure to provide adequate written reasons for death claim decisions</li> </ul>  | <ul style="list-style-type: none"> <li>• Disclosure (Death Decisions) - 1</li> </ul>                            |
| <b>2017</b> | 2 reportable breaches<br># Incidents - 569<br># Breaches - 318 | <ul style="list-style-type: none"> <li>• Overpayment of compassionate grounds in three instances (discovered via internal audit)</li> <li>• Breach of trigger point of AFSL licence conditions due to delayed invoice/finance error</li> </ul> | <ul style="list-style-type: none"> <li>• Admin. Error (System) - 1</li> <li>• Licence Conditions - 1</li> </ul> |