

## INVESTMENT ACCOUNT REGULAR PREMIUM SUPER PLAN MEMBER OUTCOMES ASSESSMENT

## INTRODUCTION

In this report, Equity Trustees Superannuation Limited publishes the results of our annual assessment of how well the Investment Account Regular Premium Super Plan product (the **product**) issued from the National Mutual Retirement Fund (the **fund**) provides member outcomes and promotes members' financial interests. The assessment is based on information as at 30 June 2024.

## **COVERAGE**

There are three versions of this Product which are summarised in the following table. In this report we have assessed the first version of the product (NMRACC111).

Version	Product Code	Size	Total Fees	Investment options	Weighted average 3- year net return	Insurance cover
1	NMRACC111	\$52.2M	1.36% p.a.	1	4.09%	No
2	NMRACC112	\$0.2M	1.36% p.a	1	4.09%	No
3	NMRACC113	\$29.6M	1.36% p.a	1	4.09%	No

## **METHODOLOGY AND STRUCTURE**

In conducting this assessment, we compared the product to other choice superannuation products included in statistical data published by the Australian Prudential Regulation Authority (comparable products) using the criteria in Part 6 of the Superannuation Industry (Supervision) Act 1993 and Prudential Standard SPS 515 Strategic Planning and Member Outcomes.

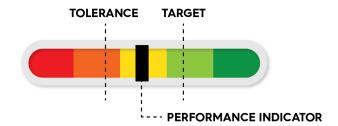
This report includes:

- our overall assessment of whether the product provides optimal member outcomes and promotes their financial interests:
- a dashboard that depicts our assessment of the product's market-relative performance for each outcome we aim to provide members;
- a table summarising the key metrics that we relied on when making this assessment; and
- our commentary on this performance that includes action items to improve suboptimal performance.

For each member outcome, the dashboard presents the relevant segment of market performance. The width of each segment is based on the range of market performance for each outcome and is specific to each outcome. The positioning of the black performance indicator bar against the colour coding is our assessment of how well the outcome has been delivered. The colour coding gives a visual representation of performance that moves from neutral (yellow) through orange to least tolerance (red), and in the opposite direction from yellow to the target (or green) area of the dashboard. The assessment of each member outcome is based on several equally-weighted metrics. Accordingly, if one metric is outside our tolerance level it doesn't automatically mean the entire member outcome is outside our tolerance level.



Example dashboard for illustrative purposes only



The target is generally the average position of the comparable products while the tolerance level is the trigger for us to consider any necessary actions to improve member outcomes.

Please visit our website to view a short video that provides more information about the operation of the dashboard.

### OVERALL ASSESSMENT

Having carefully considered the comparisons of the product with comparable products set out in this report, including the dashboards, metrics, commentary, and other relevant information available to us at the time of writing, we have concluded that as a result of the following factors the Product is promoting members' financial interests:

- 1. the fees and costs that affect the return to members are appropriate having regard to their financial interests;
- 2. the net returns for the product (i.e. returns after deducting all fees, costs and taxes) are consistent with market rates;
- 3. the level of investment risk for the product is acceptable in relation to the net returns generated;
- 4. the investment strategy for the product is appropriate;
- 5. the options, benefits and facilities offered in the product are appropriate for members; and
- 6. the scale of the Product and the Fund does not disadvantage members.

## **DASHBOARD**

#### **STRATEGIC CONTEXT**

Working together with the fund's promoter, Resolution Life, our purpose is to enhance the retirement outcomes for members by providing a broad and effectively delivered service offering to enhance member experience and simplify product and pricing strategies.

To support this purpose, our goals for the fund are to enhance member's retirement balances through reduced fees, provide members with confidence through reliable and clear delivery of regulatory compliance, satisfy members through engaging member service that assists them grow their account balances, grow member balances through competitive investment returns in line with stated objectives and targets and effective governance and risk management to protect member interests.

The product is a choice accumulation product.



#### **INVESTMENT RETURN**

Investment return for a \$50,000 account balance in the product<sup>1.0</sup> is consistent with Outcomes market indexes. Our product's performance relative to comparable products Tolerance Target Metrics Ref Metric Label Value Tolerance **Target** 1.1 1-year actual net return 9.84% 2.24% 2.84% 1.2 4.09% 0.19% 0.91% 3-year actual net return

1.0 Investment returns and associated targets and tolerance levels are weighted averages for the product. The weighted averages are based on the performance, asset allocation and funds under management of the investment options available in the product. The table in Appendix 1 provides more information.

1.1 – 1.2 The product's fee structure leads to different net returns for different account balances. The table in Appendix 2 provides more information.

1.2 Net returns are based on historic returns and the current fee structure.

#### Commentary

The performance indicator measures the weighted average investment return of all investment options in the product over 1 and 3-year periods and is based on an equal weighting of all the metrics in the above table.

Appendix 1 displays the investment returns for each investment option available in the product and the weighted average investment returns for the product over these periods.

This commentary focuses on the 3-year weighted average return to 30 June 2024. The 3-year period is a balance between short-term and long-term performance. When reading this commentary, it's important to bear in mind that past performance is not a reliable indicator of future performance.

Over the 3-years to 30 June 2024 the product's weighted average investment return was above our target level. Due to the nature of capital guaranteed products there is a great focus on capital protection as opposed to capital growth which may impact performance over time. No action is required as a result of this assessment.

The investment strategy for the Fund is reviewed annually, which includes the risk return profile of the investment options, and we are comfortable it is appropriate for members.



#### **INVESTMENT RISK**

#### Investment risk for a \$50,000 account balance in the product is consistent with the Outcomes Standard Risk Measure (SRM)<sup>2.0</sup>. Our product's performance relative to comparable products Tolerance i Target Metrics Ref Metric Label Value Tolerance **Target** 2.1 Negative annual net returns over last 1.00 1.00 0.00 10 years 2.0 Negative annual returns and associated targets and tolerance levels are weighted averages for the product. The weighted averages are based on the performance, SRM and funds under management of the investment options available in the product. Portions of years have been rounded up or down to a whole

#### Commentary

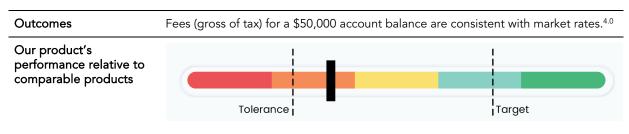
The performance indicator measures the weighted average number of negative annual returns since the product's inception.

When reading this commentary, it's important to bear in mind that past performance is not a reliable indicator of future performance.

Since inception the weighted average number of negative returns for the product was within our tolerance level.

The investment strategy for the Fund is reviewed annually, which includes the risk return profile of the investment options and we are comfortable it is appropriate for members.

#### **FEES AND COSTS**



Metrics	Ref	Metric Label	Value	Tolerance	Target
	4.1	Total fees	1.36%	1.43%	0.98%

4.0 The product's fee structure leads to different net returns for different account balances. The table in the Appendix 2 provides more information.

4.1 These fees include a weighted average investment fee that is based on the investment fees and funds under management of the investment options available in the product.

#### Commentary

This table lists the product's total fees and costs (administration and investment fees and costs). Other fees may be payable which are set out in the product's disclosure documents.

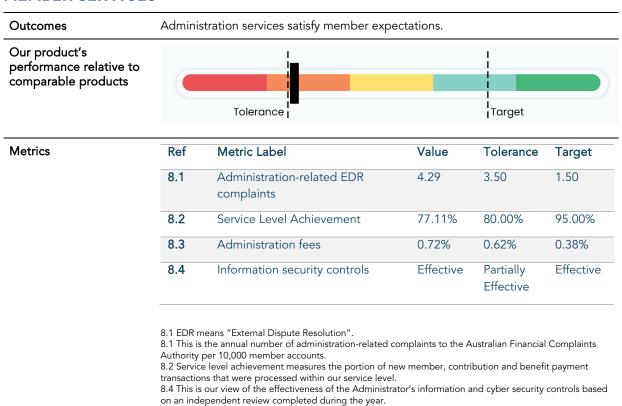


The performance indicator measures total fees and costs together against comparable products.

Total fees were within our tolerance level.

As a result, we are comfortable that fees and costs are consistent with market rates and therefore are appropriate having regard to members financial interests.

#### **MEMBER SERVICES**



#### Commentary

The performance indicator measures the delivery of administration services against our service levels, and against the cost of similar services for comparable products.

The performance indicator, which is within our tolerance level, is based on an equal weighting of the above metrics.

The number of complaints about administration services that have been made to the Australian Financial Complaints Authority is outside our tolerance level. However, we review all complaints to make sure that valid complaints are upheld and the member receives appropriate remediation / compensation.

Service level achievement and administration fees are outside of our tolerance level.

We are reasonably comfortable that administration services satisfy member expectations because of the improvement in the rate of service level achievement since FY23, the reduction in number of administration related complaints and administration fees since FY23 and the effectiveness of administrator's information and cyber security controls.

Therefore, we consider the options, benefits and facilities offered in the product are appropriate for members.



#### **SCALE**

Outcomes	The fund is likely to deliver optimal outcomes in the future.						
The scale of the fund relative to comparable products			Target				
		Tolerance					
Metrics	Ref	Metric Label	Value	Tolerance	Target		
	9.1	RSE adjusted total accounts growth rate	-9.13%	-6.25%	-2.50%		
	9.2	RSE Net Cash Flow Ratio	-9.35%	-2.75%	-0.50%		
	9.3	RSE Net Rollover Ratio	-6.43%	-3.00%	-1.75%		

#### Commentary

The performance indicator measures the fund's growth and ability to deliver scale benefits to members against other funds.

assets averaged over the three year period, excluding SFTs.

9.2 The RSE Net Cash Flow Ratio is members' benefits flows in less members' benefits flows out as a percentage of cash flow adjusted net assets averaged over the three year period, excluding SFTs.9.3 The RSE Net Rollover Ratio is rollovers in less rollovers out as a percentage of cash flow adjusted net

The performance indicator, which is below our tolerance level, is based on an equal weighting of the above metrics.

The fund is closed to new members and continues to be in run off, with membership decreasing by 9% in FY24. It is expected to decrease at a slightly lower rate over the next 3 years.

With total member benefits of \$5.8b and approximately 161,000 members, we believe that the fund has reasonable scale.

We will continue to monitor the impact that the expected reduction in fund size may have on member outcomes and take appropriate action if required.



#### **LIQUIDITY**

# Outcomes Benefit and rollover requests can be met in a timely manner from investments Our product's performance relative to comparable products Tolerance

Metrics	Ref	Metric Label	Value	Tolerance	Target
	10.1	Investment liquidity in a GFC scenario	100.00%	40.00%	80.00%

10.1 Liquidity is a weighted average that is based on the liquidity in a Global Financial Crisis scenario and funds under management of the investment options available in the product. The table in Appendix 1 provides more information.

#### Commentary

The performance indicator measures the fund's ability to meet benefit and rollover requests in a timely manner.

We regularly monitor whether the investments would be able to meet cash requirements in extreme situations. Based on our analysis, we consider that benefits are supported by liquid investments.

As a result, we are comfortable that the level of liquidity risk for the product is acceptable.



## **APPENDIX 1**

#### **INVESTMENT OPTION INFORMATION**

				Investment Period			
Investment Option	Inception Date	Growth Ratio	Member Assets	1 Year	3 Years	5 Years	10 Years
IAA Capital Guaranteed	2020-05-15	0%	\$52.2M	9.84%	4.09%		
Weighted Average		0%	\$52.2M	9.84%	4.09%		

This table provides information about the asset allocation, size and performance of the investment options available in the product.

## **APPENDIX 2**

#### **ACCOUNT BALANCE-BASED INVESTMENT METRICS**

Account Balance Value							
Time Frame	\$10,000	\$25,000	\$50,000	\$100,000	\$250,000	\$500,000	
1	9.3%	9.7%	9.8%	9.9%	10.0%	10.0%	
3	3.6%	4.0%	4.1%	4.2%	4.2%	4.2%	

This table illustrates how the product's fee structure affects net returns for different account balances. The illustration is based on historic returns and the current fee structure.