

FoC PERSONAL MEMBER OUTCOMES ASSESSMENT

INTRODUCTION

In this report, Equity Trustees Superannuation Limited publishes the results of our annual assessment of how well the Freedom of Choice Personal Super product (the **product**) issued from AMG Super (the **fund**) provides member outcomes and promotes members' financial interests. The assessment is based on information as at 30 June 2024.

METHODOLOGY AND STRUCTURE

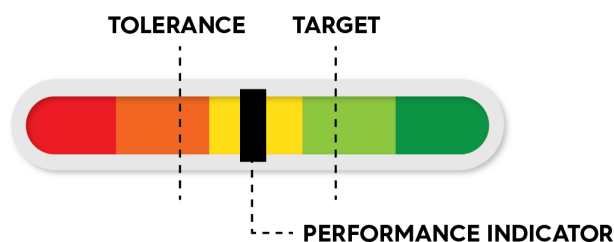
In conducting this assessment, we compared the product to other choice superannuation products included in statistical data published by the Australian Prudential Regulation Authority (**comparable products**) using the criteria in Part 6 of the *Superannuation Industry (Supervision) Act 1993* and Prudential 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 investment strategy for the product is appropriate;
3. the options, benefits and facilities offered in the product are appropriate for members;
4. the insurance premium charged for the product does not inappropriately erode members' account balances;
5. the insurance strategy for the product is appropriate; and
6. the scale of the product and the fund does not disadvantage members.

DASHBOARD

STRATEGIC CONTEXT

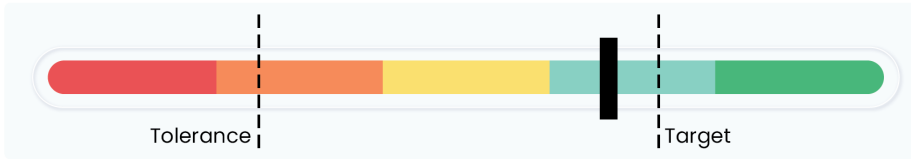
Working together with the fund's promoter, Acclaim Wealth, our purpose is to provide quality and value for money superannuation products to a diverse range of members, from default members to more sophisticated advised members who want features similar to a self-managed superannuation fund.

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 to grow their account balances;
- grow member balances through competitive investment returns in line with stated objectives and targets;
- deliver members scale benefits through enhanced distribution; and
- complete an administration system modernisation to reduce operating costs and enhance member service.

The product is a choice platform product.

INVESTMENT MENU

Outcomes	The product provides an appropriate range of suitable investments.				
Our product's performance relative to comparable products					
Metrics	Ref	Metric Label	Value	Tolerance	Target
	3.1	Third party endorsed investments	94.58%	80.00%	100.00%
	3.2	Coverage of key asset classes	100.00%	63.00%	100.00%
3.1 An investment is endorsed when it or its manager has been publicly recommended by a research house, or recommended to us by an asset consultant or an investment manager.					

Commentary


We seek to provide members with a range of suitable investments to select from in order to achieve their investment outcomes and meet their targeted risk profile. The performance indicator measures the range of investment options provided for members.



The performance indicator is within our tolerance level. No action is required as a result of this assessment.

Therefore, we are comfortable that the product provides members with sufficient investment options to achieve their investment goals within their targeted risk profile.

FEES AND COSTS

Outcomes	Fees (gross of tax) for a \$250,000 account balance are consistent with market rates.				
Our product's performance relative to comparable products	 <p>The chart is a horizontal bar with a gradient from red on the left to green on the right. A vertical dashed line labeled 'Tolerance' is positioned at the left end of the bar. A solid black vertical bar is positioned at the right end of the bar. A vertical dashed line labeled 'Target' is positioned at the right end of the bar.</p>				
Metrics	Ref	Metric Label	Value	Tolerance	Target
	4.1	Administration fees at \$250K	0.78%	0.80%	0.60%
4.1 Members pay platform administration fees, plus expense recoveries and the fees associated with their selected investment portfolio. We monitor the administration fees, which are shown here.					

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.

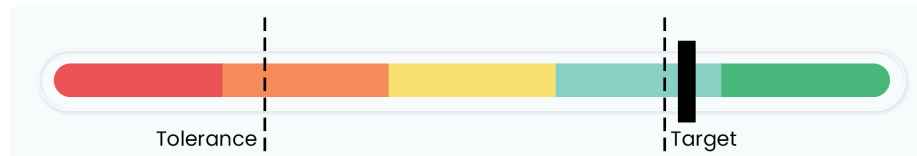
As a result, we are comfortable that fees and costs are consistent with market rates and therefore are appropriate having regard to members financial interests.



INSURANCE CLAIM MANAGEMENT

Outcomes Valid claims are accepted and paid in a timely manner.

Our product's performance relative to comparable products



Metrics	Ref	Metric Label	Value	Tolerance	Target
	6.1	Insurer's declined claims ratio - life cover	0.00%	4.75%	3.00%
	6.2	Insurer's average time to decision - life cover	2.12	2.50	2.00
	6.3	Insurer's declined claims ratio - TPD cover	0.00%	22.25%	16.50%
	6.4	Insurer's average time to decision - TPD cover	6.12	13.75	8.00
	6.5	Insurer's declined claims ratio - IP cover	0.00%	6.75%	5.25%
	6.6	Insurer's average time to decision - IP cover	3.30	2.00	1.50
	6.7	Insurance-related EDR complaints	0.37	2.25	0.75

6.2, 6.4 and 6.6 The time to decision is measured in months.
 6.3 – 6.4 TPD means "Total and Permanent Disablement".
 6.5 – 6.6 IP means "Income Protection".
 6.7 EDR means "External Dispute Resolution".
 6.7 This is the annual number of insurance-related complaints to the Australian Financial Complaints Authority per 10,000 member accounts.

Commentary

The performance indicator measures the acceptance of insurance claims, the timeliness of claim decision-making and the quality of the claims process against comparable products.

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

The insured benefits in this product are supported by group and retail insurance policies. For this suite of policies, in the year ended 30 June 2024 the fund's insurers:

- paid 10 life insurance claims and declined 0 life insurance claims;
- paid 2 TPD insurance claims and declined 0 TPD insurance claims; and
- paid 1 IP insurance claims and declined 0 IP insurance claims.

The insurer's average time to decision for income protection insurance cover claims is outside our tolerance level as this metric is based on a single claim for the year. We are comfortable that the claim has been handled appropriately based on its individual circumstances.

When relevant we review all declined insurance claims to make sure the insurer has acted fairly and reasonably, and consistently with the relevant policy terms and conditions.

Considering all these matters, we are comfortable that valid claims are accepted and paid.

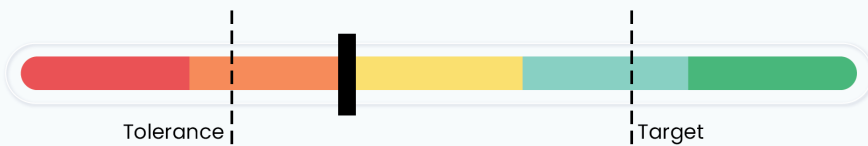


We believe that the appropriate level of insurance cover is a balance between the amount of cover required (based on the maintenance of the member's, and their dependants', standard of living in the event of an accident or illness) and the affordability of that cover for the member.

Members have the opportunity to seek personal financial advice if required, select their own level of insurance cover and cancel their cover if no longer required. Therefore:

- the insurance premiums charged for the product do not inappropriately erode members' account balances; and
- the insurance strategy for the product is appropriate.

MEMBER SERVICES

Outcomes	Administration services satisfy member expectations.				
Our product's performance relative to comparable products					
Metrics	Ref	Metric Label	Value	Tolerance	Target
	8.1	Administration-related EDR complaints	4.77	3.50	1.50
	8.2	Service Level Achievement	84.43%	80.00%	95.00%
	8.3	Information security controls	Effective	Partially Effective	Effective

8.1 EDR means "External Dispute Resolution".

8.1 This is the annual number of administration-related complaints to the Australian Financial Complaints Authority per 10,000 member accounts.

8.2 Service level achievement measures the portion of new member, contribution and benefit payment transactions that were processed within our service level.

8.3 This is our view of the effectiveness of the Administrator's information and cyber security controls based on an independent review completed during the year.

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.

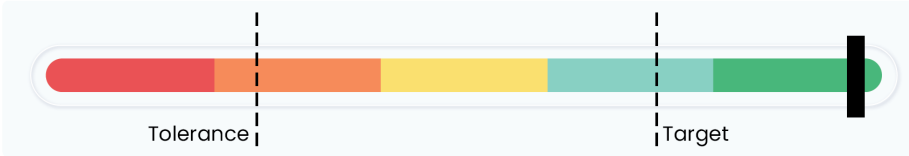
Service level achievement and the administrator's information and cyber security controls were within our tolerance level.

The number of complaints about administration services that have been made to the Australian Financial Complaints Authority is outside our tolerance level. Many of the complaints arose due to the successor fund transfer of Raiz Invest Super into the fund, and investments of the former NQ Super and Pension product. We review all complaints to make sure that valid complaints are upheld and the member receives appropriate remediation / compensation.

As a result, we are comfortable that administration services satisfy member expectations and therefore 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					
Metrics	Ref	Metric Label	Value	Tolerance	Target
	9.1	RSE adjusted total accounts growth rate	5.07%	-6.25%	-2.50%
	9.2	RSE Net Cash Flow Ratio	10.90%	-2.75%	-0.50%
	9.3	RSE Net Rollover Ratio	8.21%	-3.00%	-1.75%
<p>9.1 The RSE adjusted total accounts growth rate is the average annual percentage change in member accounts averaged over the three year period, excluding Successor Fund Transfers (SFTs) and account consolidations.</p> <p>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.</p> <p>9.3 The RSE Net Rollover Ratio is rollovers in less rollovers out as a percentage of cash flow adjusted net assets averaged over the three year period, excluding SFTs.</p>					

Commentary

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

The performance indicator, was above our target level, is based on an equal weighting of the above metrics. No action is required as a result of this assessment.

Therefore, we are comfortable that the scale of the product and the fund does not disadvantage members