

ACCLAIM CORE PENSION MEMBER OUTCOMES ASSESSMENT

INTRODUCTION

In this report, Equity Trustees Superannuation Limited publishes the results of our annual assessment of how well the Acclaim Core Pension product (the **product**) issued from AMG Super Fund (the **fund**) provides member outcomes and promotes members' financial interests. The assessment is based on information as at 30 June 2023.

METHODOLOGY AND STRUCTURE

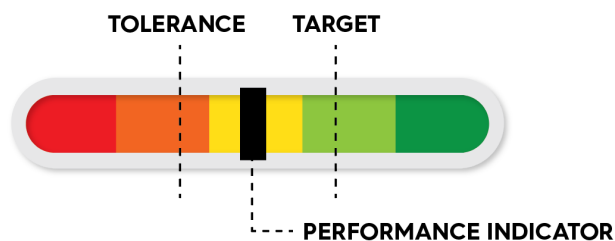
In conducting this assessment, we compared the product to other choice superannuation products included in statistical data published by the Australian Prudential Regulation Authority (**comparable products**) using the criteria in Part 6 of the *Superannuation Industry (Supervision) Act 1993* and Prudential 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;
6. the scale of the product and the fund does not disadvantage members.

ACTION ITEMS

We will work with Acclaim Wealth to address any areas of weakness and reduce the number of complaints to an acceptable level.

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 target;
- deliver members scale benefits through enhanced distribution;
- to wind-up the AMG MySuper investment option to existing members; and
- complete an administration system modernisation to reduce operating costs and enhance member service.

The product is a choice pension product.



INVESTMENT RETURN

| | | | | | |
|--|--|--------------------------|-------|-----------|--------|
| Outcomes | Investment return for a \$50,000 account balance in the product ^{1.0} is consistent with market indexes. | | | | |
| Our product's performance relative to comparable products | <p>The gauge shows 'Investment Return' with a black needle pointing to a red segment. A vertical dashed line labeled 'Tolerance' is at the end of the red segment. Another vertical dashed line labeled 'Target' is at the end of the green segment. The gauge is divided into segments: red, orange, yellow, light blue, and green.</p> | | | | |
| Metrics | Ref | Metric Label | Value | Tolerance | Target |
| | 1.1 | 1-year actual net return | 6.95% | 7.78% | 8.23% |
| | <p>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 – 1.4 The product's fee structure leads to different net returns for different account balances. The table in Appendix 2 provides more information. 1.2 – 1.4 Net returns are based on historic returns and the current fee structure.</p> | | | | |

Commentary

The performance indicator measures the average investment return of all investment options over a 1-year period and is based on an equal weighting of all the metrics in the above table. The Index Diversified investment options inception date is at 28 March 2022 and therefore there is no performance history to measure annual returns beyond 1-year.

Appendix 1 displays the returns for each investment option available in the product and its weighted average returns over this period.

This commentary focuses on the 1-year weighted average return to 30 June 2023.

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

Over the 1-year to 30 June 2023 the fund's weighted average investment return is outside our tolerance level. The major detractor from investment performance over the 1-year period was manager selection in the Listed Property asset class.

While we cannot remove underperformance in the past, we will seek to ensure member outcomes are protected in the future by optimising investment performance through changes to the fees and investment strategy.

We believe these changes will ensure that investment strategy for the product is appropriate.



FEES AND COSTS

Outcomes Fees (gross of tax) for a \$50,000 account balance are consistent with market rates.^{4.0}



| Metrics | Ref | Metric Label | Value | Tolerance | Target |
|---------|-----|--------------|-------|-----------|--------|
| | 4.1 | Total fees | 0.85% | 1.47% | 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.

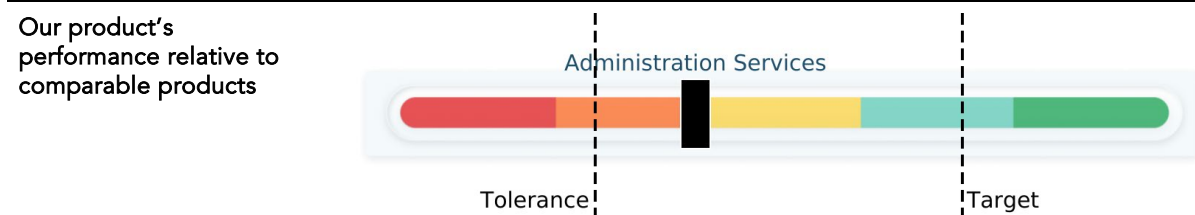
The performance indicator measures total fees and costs together against comparable products.

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

Outcomes Administration services satisfy member expectations.



| Metrics | Ref | Metric Label | Value | Tolerance | Target |
|---------|-----|---------------------------------------|-----------|--------------|-----------|
| | 8.1 | Administration-related EDR complaints | 3.65 | 3.50 | 1.50 |
| | 8.2 | Service Level Achievement | 86.09% | 80.00% | 90.00% |
| | 8.3 | Administration fees | 0.73% | 0.62% | 0.38% |
| | 8.4 | Information security controls | Effective | Partially .. | 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.

8.4 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.

Administration fees were outside of our tolerance level. As total fees are within our tolerance level, no action is required as a result of this assessment.

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 on 16 December 2022 and have since decreased after 30 June 2023.

To improve this, we:

- will work with Acclaim Wealth to address any areas of weakness and reduce the number of complaints to an acceptable level; and
- work with the administrator and promotor to make sure clear and transparent communications between all parties involved.

As a result, we are comfortable that administration services satisfy member expectations because the high rate of service level achievement and the administrator’s information and cyber security controls are effective.

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 | | | | | |
| Metrics | Ref | Metric Label | Value | Tolerance | Target |
| | 9.1 | RSE adjusted total accounts growth rate | -11.32% | -6.25% | -2.50% |
| | 9.2 | RSE Net Cash Flow Ratio | 8.70% | -2.75% | -0.50% |
| | 9.3 | RSE Net Rollover Ratio | 6.01% | -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.

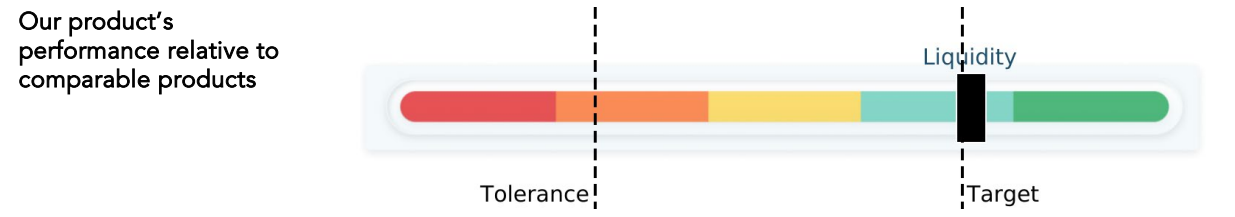
The performance indicator, which is within our tolerance level, is based on an equal weighting of the above metrics. No action is required as a result of this assessment.

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



LIQUIDITY

Outcomes Benefit and rollover requests can be met in a timely manner from investments.



| Metrics | Ref | Metric Label | Value | Tolerance | Target |
|---------|------|--|--------|-----------|--------|
| | 10.1 | Investment liquidity in a GFC scenario | 95.00% | 40.00% | 80.00% |
| | 10.2 | Insurer financial strength rating | A+ | BBB | AA |

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 and insurance policies 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 Option | Inception Date | Growth Ratio | Member Assets | Investment Period | | | |
|----------------------------------|----------------|--------------|---------------|-------------------|---------|---------|----------|
| | | | | 1 Year | 3 Years | 5 Years | 10 Years |
| AMG Cash | 2012-06-22 | 0% | \$0.0M | | | | |
| AMG Index Australian Equities | 2022-04-01 | 97% | \$0.0M | | | | |
| AMG Index Balanced | 2022-04-01 | 54% | \$0.1M | 6.95% | | | |
| AMG Index Conservative | 2022-04-01 | 34% | \$0.0M | | | | |
| AMG Index Fixed Interest | 2022-04-01 | 0% | \$0.0M | | | | |
| AMG Index Growth | 2022-04-01 | 74% | \$0.0M | | | | |
| AMG Index High Growth | 2022-04-01 | 84% | \$0.0M | | | | |
| AMG Index International Equities | 2022-04-01 | 97% | \$0.0M | | | | |
| AMG Index Listed Property | 2022-04-01 | 97% | \$0.0M | | | | |
| Weighted Average | | 58% | \$0.1M | 6.95% | | | |

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

| Time Frame | Account Balance Value | | | | | |
|------------|-----------------------|----------|----------|-----------|-----------|-----------|
| | \$10,000 | \$25,000 | \$50,000 | \$100,000 | \$250,000 | \$500,000 |
| 1 | 6.3% | 6.8% | 6.9% | 7.0% | 7.1% | 7.2% |

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.

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