

FREEDOM OF CHOICE PERSONAL SUPER 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 2023.

METHODOLOGY AND STRUCTURE

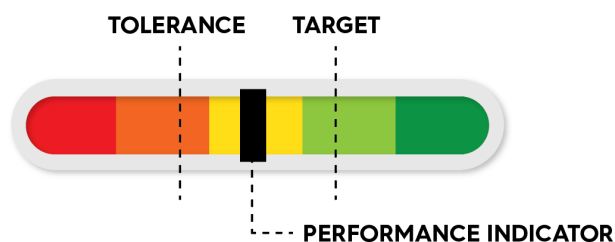
In conducting this assessment, we compared the product to other choice superannuation products included in statistical data published by the Australian Prudential Regulation Authority (**comparable products**) using the criteria in Part 6 of the *Superannuation Industry (Supervision) Act 1993* and Prudential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

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 targets;
- 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 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	Investments above investment grade	98.14%	80.00%	100.00%
	3.2	Coverage of key asset classes	100.00%	63.00%	100.00%
<p>3.1 An investment is “investment grade” 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.</p>					



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.



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 administration fees for a \$250,000 account balance invested in Single Manager and Term Deposit investments. Other fees may be payable which are set out in the product's disclosure documents.

The performance indicator, which is within our tolerance level, measures administration fees against comparable products. No action is required as a result of this assessment.

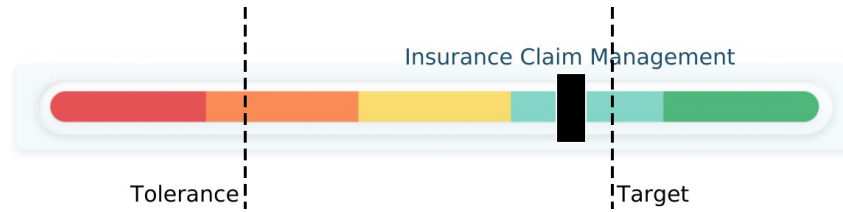
As a result, we are comfortable that fees and costs are consistent with market rates and therefore are appropriate having regard to members' financial interests.



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	5.11	2.50	2.00
	6.3	Insurer's declined claims ratio - TPD cover	50.00%	22.25%	16.50%
	6.4	Insurer's average time to decision - TPD cover	0.33	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	1.27	2.00	1.50
	6.7	Insurance-related EDR complaints	0.41	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 equal weighting of all the metrics in the above table.

The insured benefits in this product are supported by retail life insurance policies. For this suite of policies, in the year ended 30 June 2023 the fund's insurer:

- paid 4 death benefit claims and declined 0 death benefit claims;
- paid 1 TPD benefit claims and declined 1 TPD claim; and
- paid 1 IP claim and declined 0 IP claims.

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. Based on these reviews, we are comfortable that denied claims have been considered appropriately.

The average time to decision for death claims is outside tolerance level, but is considered reasonable given that no claims were declined. With this in mind, we are comfortable that valid claims are accepted and paid in a timely manner, unless there are 'circumstances beyond our control' as defined in the Life Insurance Code of Practice.

The number of insurance-related complaints that have been made to the Australian Financial Complaints Authority is within our tolerance level.

All Insurance Cover is voluntary. 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	3.65	3.50	1.50
	8.2	Service Level Achievement	86.09%	80.00%	90.00%
	8.3	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.

8.3 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 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. Many of the complaints arose due to the successor fund transfer (SFT) 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 there are clear and transparent communications between all parties involved.

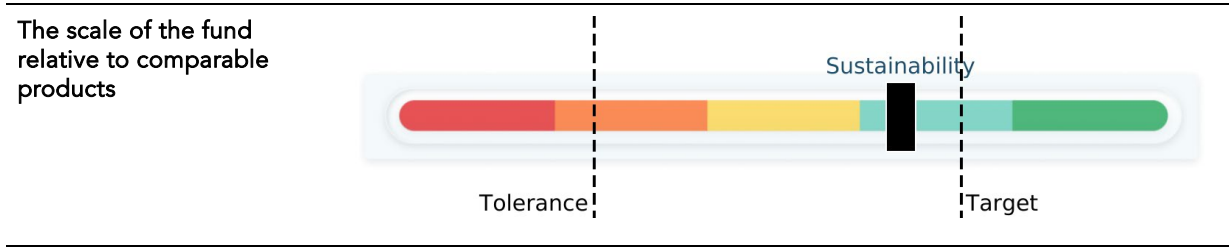
As a result, we are comfortable that administration services satisfy member expectations because of the high rate of service level achievement and the Administrator’s information and cyber security controls are effective.

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.



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%

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.

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 assets averaged over the three year period, excluding SFTs.

Commentary

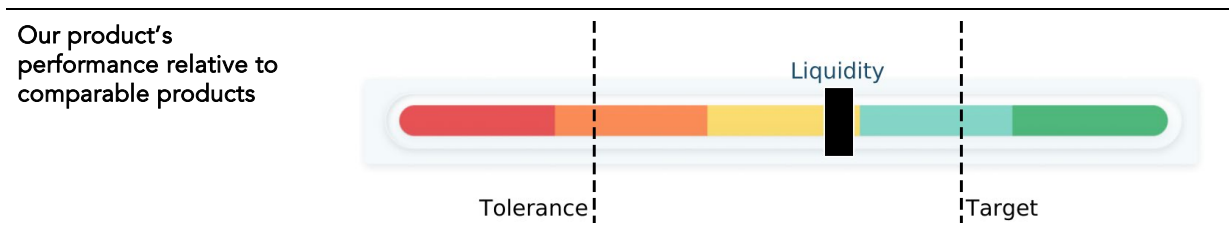
The performance indicator measures the fund’s growth and ability to deliver scale benefits to members against other funds.

The performance indicator, which is within our tolerance level, is based on 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 insurance policies



Metrics	Ref	Metric Label	Value	Tolerance	Target
	10.2	Insurer financial strength rating	A+	BBB	AA

Commentary

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

We regularly monitor whether the insurance policies would be able to meet cash requirements in extreme situations. Based on our analysis, we consider that benefits are supported by an insurer with a strong capacity to meet its financial commitments.

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



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