

# 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 2023.

### **COVERAGE**

There are two versions of this Product which are summarised in the following table. In this report we have assessed the first version of the product (NMRACC111). Members holding the second version of the Product can obtain further information by visiting:

- National Mutual Retirement Fund Investment portfolio fees and costs (resolutionlife.com.au); and
- Investment Report NM Superannuation Pty Ltd (resolutionlife.com.au).

Version	Product Code	Size	Total Fees	Investment options	Weighted average 3- year net return	Insurance cover
1	NMRACC111	\$53.1M	1.33% p.a.	1	1.75%	No
2	NMRACC112	\$0.2M	1.33% p.a	1	1.75%	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.

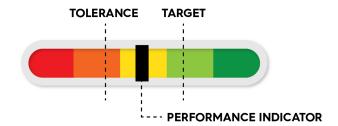
This report includes:

- 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 not appropriate for members; and
- 6. the scale of the Product and the Fund does not disadvantage members.

#### **ACTION ITEMS**

To improve administration services, we:

- worked with Resolution Life to address areas of weakness;
- will address further initiatives to improve the timeliness and quality of member services in the Fund's Strategic Business Plan for the financial years 2024-26.

## **DASHBOARD**

#### STRATEGIC CONTEXT

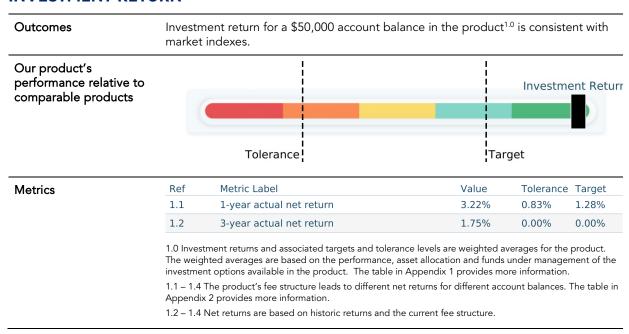
Working together with the fund's promoter, Resolution Life, our purpose is to enhance the retirement outcomes for members by providing a broad and effectively delivered service offering to enhance member experience and simplify product and pricing strategies.

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**



#### Commentary

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

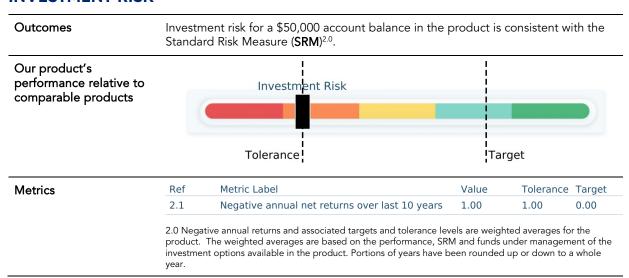
It is important to note that the product was transferred into the Fund in May 2020. Therefore, performance prior to this date is not available to us. For further information on the product's investment performance, please click here <a href="https://resolutionlife.com.au/content/dam/au/digitalhub/common/Documents/Super/Performance/NMLA Monthly Investment Performance June.pdf">https://resolutionlife.com.au/content/dam/au/digitalhub/common/Documents/Super/Performance/NMLA Monthly Investment Performance June.pdf</a>.

This commentary focuses on the three-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 three years to 30 June 2023 the product's weighted average investment return was within our tolerance level. No action is required as a result of this assessment.

Therefore, we consider the investment strategy for the product is appropriate because the weighted average returns are within our tolerance level.

#### **INVESTMENT RISK**





#### Commentary

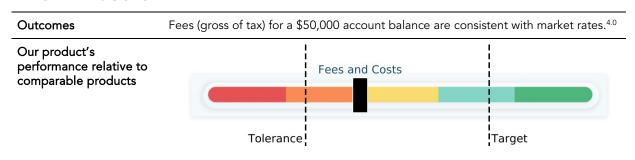
The performance indicator measures the weighted average number of negative annual returns for the 10 years to this date.

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

Over the 10 years to 30 June 2023 the weighted average number of negative returns for the product was consistent with our tolerance level. No action is required as a result of this assessment.

Therefore, we consider the investment risk is acceptable because the weighted average number of negative returns is within our tolerance level.

#### **FEES AND COSTS**



Metrics	Ref	Metric Label	Value	Tolerance Target	
	4.1	Total fees	1.33%	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.

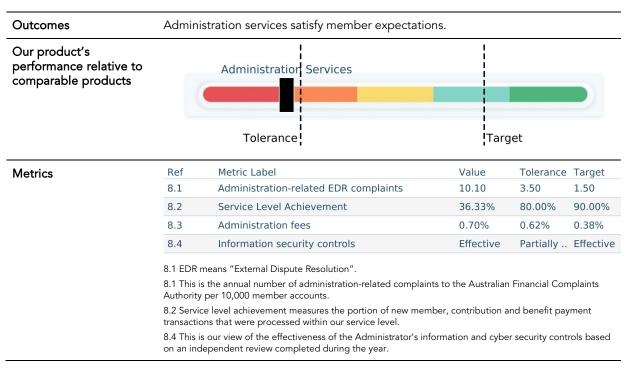
The performance indicator measures total fees and costs together against comparable products.

Total fees were within tolerance level. 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.



#### 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 outside our tolerance level is based on equal weighting of the above metrics.

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

The key driver of this result was system migration issues in June 2022 that led to delays in processing contributions and benefit payments into 2023, which resulted in a high volume of complaints.

As a result, we are not comfortable that administration services in the year ended 30 June 2023 satisfied member expectations.

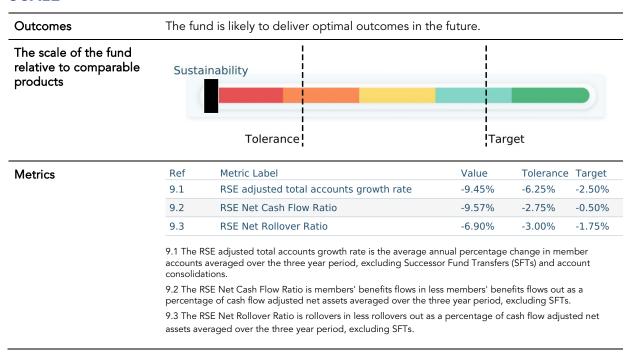
To improve administration services, we

- worked with Resolution Life to address areas of weakness; and
- will address further initiatives to improve the timeliness and quality of member services in the Fund's Strategic Business Plan for the financial years 2024-26.

It is important to note we have seen recent improvement to the service levels, which we expect will reflect in the product's next Member Outcomes Assessment as at 30 June 2024.



#### **SCALE**



#### 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 outside tolerance level, is based on an equal weighting of the above metrics.

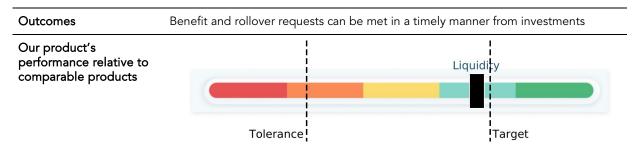
The fund is closed to new members and continues to be in run off with membership decreasing by 15% in FY23. It is expected to decrease at a slightly lower rate over the next 3 years.

With total member benefits of \$6.0b and approximately 176,000 members, we believe that the fund has reasonable scale. This is supported by the acquisition of AIA Australia's Savings & Investments business by Resolution Life Australasia on 1 July 2023, which presents opportunities to improve member outcomes and support the fund's ongoing sustainability.

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**



Metrics Ref Metric Label	Value	roierance	e Target
10.1 Investment liquidity in a GFC s	scenario 94.00%	40.00%	80.00%
10.2 Insurer financial strength ratio	ng 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 and 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.

## **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%	\$53.2M	3.22%	1.75%		
Weighted Average		0%	\$53.2M	3.22%	1.75%		

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	2.7%	3.1%	3.2%	3.3%	3.3%	3.3%		
3	1.3%	1.6%	1.8%	1.8%	1.9%	1.9%		

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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