

# INVESTMENT LINKED SUPERANNUATION PLAN MEMBER OUTCOMES ASSESSMENT

## INTRODUCTION

In this report, Equity Trustees Superannuation Limited publishes the results of our annual assessment of how well the Investment Linked Superannuation Plan product (the **product**) issued from 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.

## METHODOLOGY AND STRUCTURE

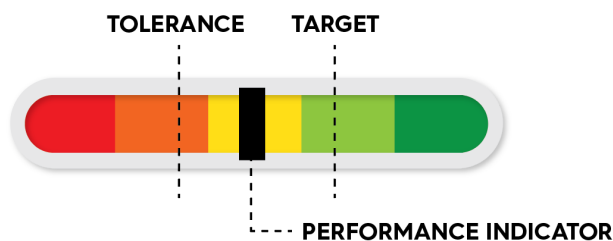
In conducting this assessment, we compared the product to other choice superannuation products included in statistical data published by the Australian Prudential Regulation Authority (**comparable products**) using the criteria in Part 6 of the *Superannuation Industry (Supervision) Act 1993* and Prudential 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 not promoting members' financial interests:

1. the fees and costs that affect the return to members are not 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 not 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;
6. the insurance premium charged for the product does not inappropriately erode members' account balances;
7. the insurance strategy for the product is appropriate; and
8. the scale of the product and the fund does not disadvantage members.

## ACTION ITEMS

To reduce fees and improve net returns:

- secured fee reductions to meet our tolerance level effective 30 June 2023, which will be reflected in the product's next Member Outcomes Assessment as at 30 June 2024;
- have taken steps to rationalise the diversified investment option range; and
- have addressed fee reductions and the rationalisation of diversified options in the fund's Strategic Business Plan for the financial years 2024-26.

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.

## 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

<b>Outcomes</b>	Investment return for a \$50,000 account balance in the product <sup>1.0</sup> is consistent with market indexes.
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Metrics	Ref	Metric Label	Value	Tolerance	Target
	1.1	1-year actual net return	8.74%	9.93%	10.38%
	1.2	3-year actual net return	6.36%	7.15%	7.89%

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.

### 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.

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

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 [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).

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 outside of our tolerance level.

Fees, asset allocation, manager style and manager underperformance have detracted from performance over the three-year period.

As a result, we are not comfortable that the product's weighted net returns are consistent with market rates and therefore do not advance members' financial interests.

To reduce fees and improve net returns:

- secured fee reductions to meet our tolerance level effective 30 June 2023, which will be reflected in the product's next Member Outcomes Assessment as at 30 June 2024;
- have taken steps to rationalise the diversified investment option range; and
- have addressed fee reductions and the rationalisation of diversified options in the fund's Strategic Business Plan for the financial years 2024-26.

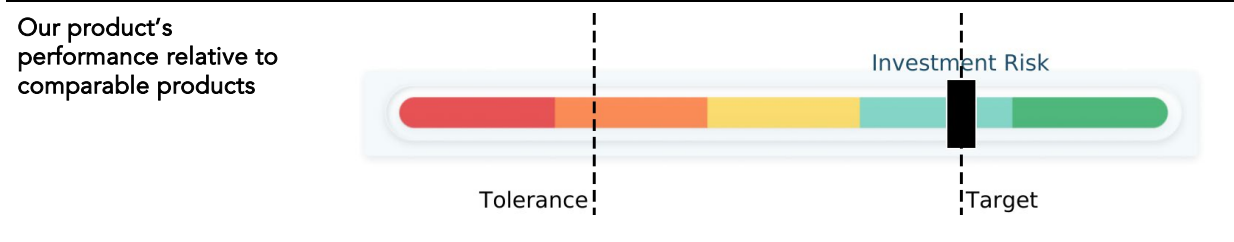


The changes mentioned above are expected to be reflected in the long term performance numbers.

For further information on the fee reductions and rationalisation of diversified options, please visit the product updates <https://resolutionlife.com.au/productupdates> section of the fund’s website.

## INVESTMENT RISK

**Outcomes** Investment risk for a \$50,000 account balance in the product is consistent with the Standard Risk Measure (SRM)<sup>2.0</sup>.



Metrics	Ref	Metric Label	Value	Tolerance	Target
	2.1	Negative annual net returns over last 10 years	1.00	2.00	1.00

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 year.

### Commentary

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

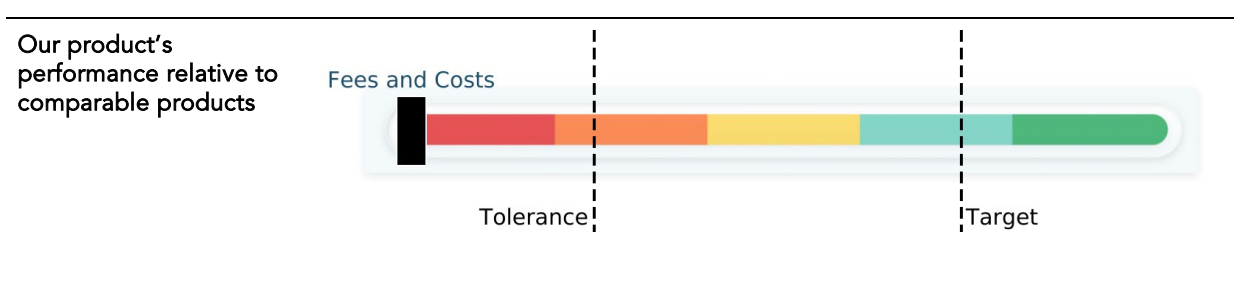
When reading this commentary, it’s important to bear in mind that past performance is not a reliable indicator of future performance.

Over the 10 years to 30 June 2023 the weighted average number of negative returns for the product was within our tolerance level.

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

## FEEES AND COSTS

**Outcomes** Fees (gross of tax) for a \$50,000 account balance are consistent with market rates.<sup>4.0</sup>



Metrics	Ref	Metric Label	Value	Tolerance	Target
	4.1	Total fees	1.76%	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) that were paid during the year ending 30 June 2023. 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 and costs were outside our tolerance level.

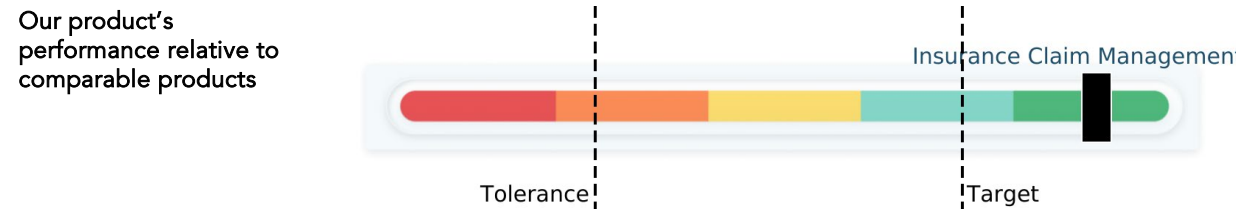
As a result, we are not comfortable that the total fees and costs were consistent with market rates and therefore, did not advance members financial interests in the financial year ending 30 June 2023.

To reduce fees and improve net returns, we:

- secured fee reductions to meet our tolerance level effective 30 June 2023, which will be reflected in the product’s next Member Outcomes Assessment as at 30 June 2024. For further information on these fee reductions, please visit the fund’s website <https://resolutionlife.com.au/productupdates>;
- will continue discussions with Resolution Life to further reduce costs and bring the fees within our revised tolerance level; and
- have addressed fee reductions in the fund's Strategic Business Plan for the financial years 2024-26.

**INSURANCE CLAIM MANAGEMENT**

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



Metrics	Ref	Metric Label	Value	Tolerance	Target
	6.1	Insurer's declined claims ratio - life cover	3.33%	4.75%	3.00%
	6.2	Insurer's average time to decision - life cover	0.86	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	3.01	13.75	8.00
	6.7	Insurance-related EDR complaints	0.00	2.25	0.75

6.2 and 6.4 The time to decision is measured in months.  
 6.3 – 6.4 TPD means “Total and Permanent Disablement”.  
 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 29 death benefit claims and declined 1 death benefit claim; and
- paid 4 TPD benefit claims and did not decline any TPD 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 is within our tolerance level and the number of insurance-related complaints that have been made to the Australian Financial Complaints Authority is within our tolerance level. No action is required as a result of this assessment.

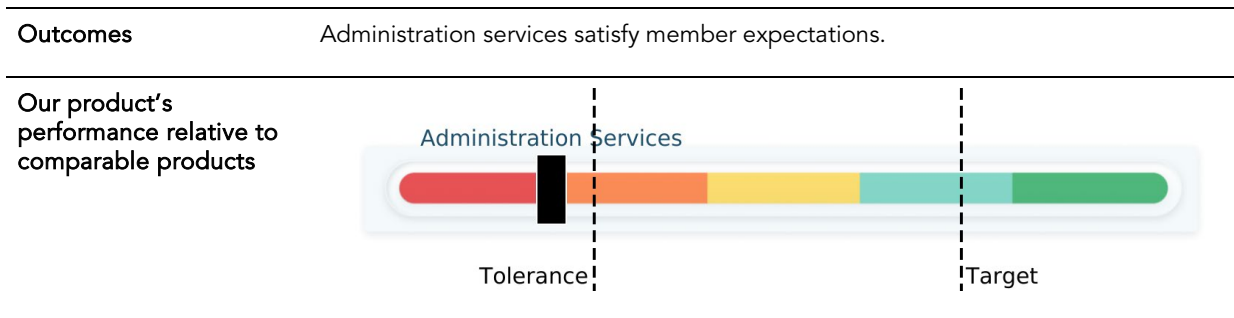
As a result, we are comfortable that valid claims are accepted and paid in a timely manner.

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



Metrics	Ref	Metric Label	Value	Tolerance	Target
	8.1	Administration-related EDR complaints	10.10	3.50	1.50
	8.2	Service Level Achievement	36.33%	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 outside our tolerance level is based on equal weighting of the above metrics.

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;
- secured fee reductions to meet our tolerance level effective 30 June 2023, which will be reflected in the product’s next Member Outcomes Assessment as at 30 June 2024. For further information on these fee reductions, please visit the fund’s website <https://resolutionlife.com.au/productupdates>; 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 be reflected in the product’s next Member Outcomes Assessment as at 30 June 2024.

## SCALE

<b>Outcomes</b>	The fund is likely to deliver optimal outcomes in the future.				
<b>The scale of the fund relative to comparable products</b>					
<b>Metrics</b>	Ref	Metric Label	Value	Tolerance	Target
	9.1	RSE adjusted total accounts growth rate	-9.45%	-6.25%	-2.50%
	9.2	RSE Net Cash Flow Ratio	-9.57%	-2.75%	-0.50%
	9.3	RSE Net Rollover Ratio	-6.90%	-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 below our target and outside tolerance level is based on 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.

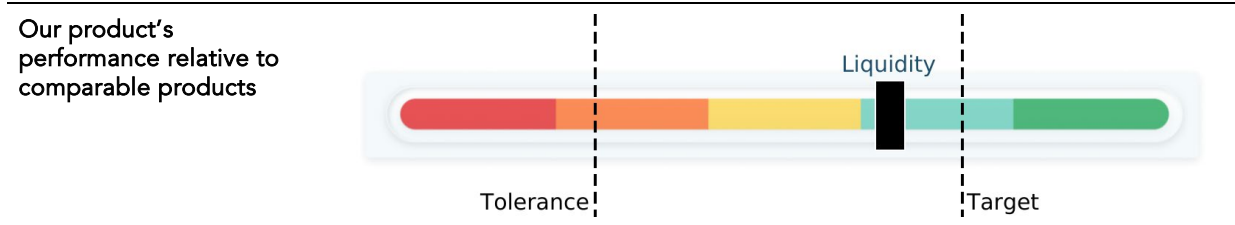
With total member benefits of \$6.0b and approximately 176,000 members, we believe that the fund has reasonable scale. This is supported by the acquisition of AIA Australia’s Savings & Investments business by Resolution Life Australasia on 1 July 2023, which presents opportunities to improve member outcomes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

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



Metrics	Ref	Metric Label	Value	Tolerance	Target
	10.1	Investment liquidity in a GFC scenario	84.09%	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 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 Option	Inception Date	Growth Ratio	Member Assets	Investment Period			
				1 Year	3 Years	5 Years	10 Years
All Growth	2020-05-15	96%	\$36.4M	12.35%	9.03%		
Balanced Growth	2020-05-15	74%	\$297.7M	8.32%	6.05%		
Cash Based	2020-05-15	0%	\$0.0M	1.12%	-0.27%		
Conservative	2020-05-15	35%	\$1.2M	2.95%	1.26%		
Weighted Average		76%	\$335.4M	8.74%	6.36%		

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	8.1%	8.6%	8.7%	8.8%	8.9%	8.9%
3	5.7%	6.2%	6.4%	6.4%	6.5%	6.5%

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.