

# INVESTMENT ONLY LIFESTYLE PROTECTION PLAN MEMBER OUTCOMES ASSESSMENT

## INTRODUCTION

In this report, Equity Trustees Superannuation Limited publishes the results of our annual assessment of how well the Investment Only Lifestyle Protection 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

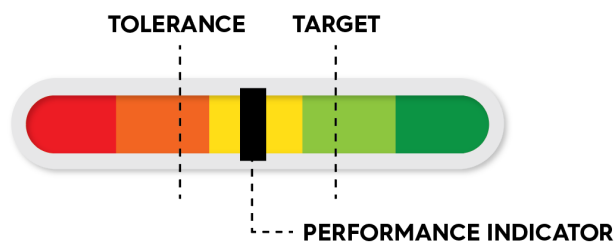
In conducting this assessment, we compared the product to other choice superannuation products included in statistical data published by the Australian Prudential Regulation Authority (**comparable products**) using the criteria in Part 6 of the *Superannuation Industry (Supervision) Act 1993* and Prudential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

1. the options, benefits and facilities offered in the product are appropriate for members;
2. the insurance premium charged for the product does not inappropriately erode members' account balances;
3. the insurance strategy for the product is appropriate; and
4. 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; 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

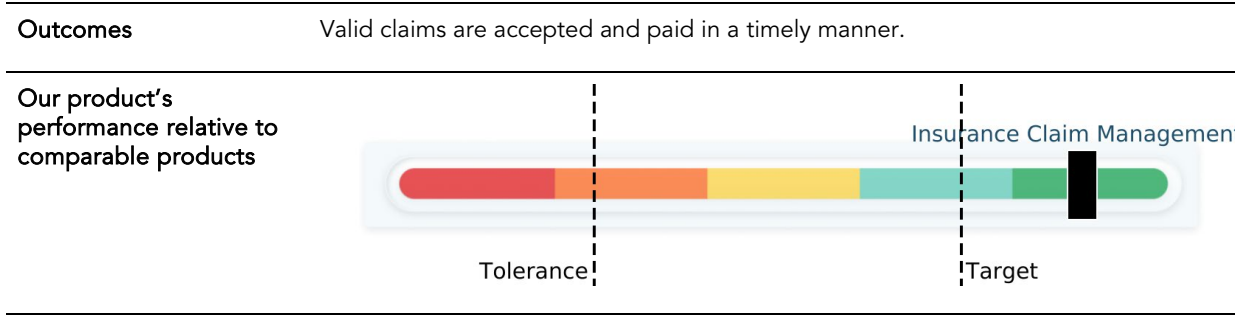
Working together with the fund's promoter, Resolution Life, our purpose is to enhance the retirement outcomes for members by providing a broad and effectively delivered service offering to enhance member experience and simplify product and pricing strategies.

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 traditional superannuation product that are supported by traditional, whole of life or endowment policies.



## INSURANCE CLAIM MANAGEMENT



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
	6.4	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.

6.4 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.

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

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

**Outcomes** Administration services satisfy member expectations.



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	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 consistent with 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.

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 be reflected in the product's next Member Outcomes Assessment as at 30 June 2024.

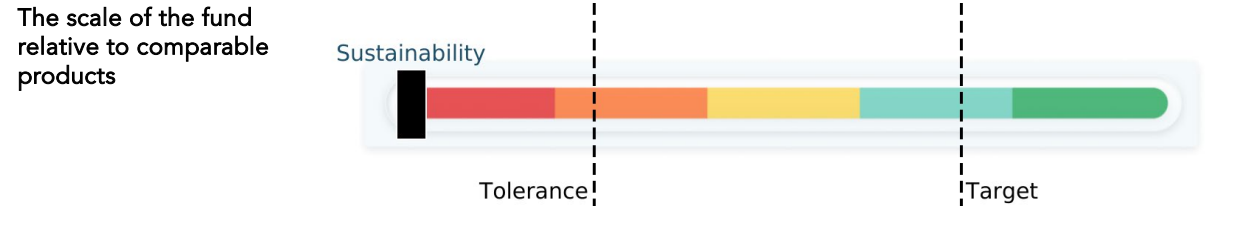
As a result, we are comfortable that administration services satisfy member expectations because of the above action undertaken and the administrator's information and cyber security controls are effective.

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	-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%

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 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.

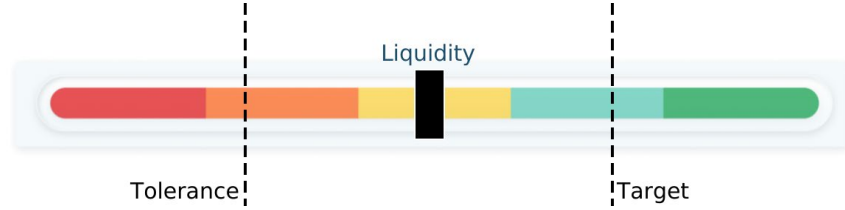
We will continue to monitor the impact that the expected reduction in fund size may have on member outcomes and take appropriate action if required.



## LIQUIDITY

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

Our product's performance relative to comparable products



Metrics	Ref	Metric Label	Value	Tolerance	Target
	10.1	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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