

# PERSONAL SUPERANNUATION BOND MEMBER OUTCOMES ASSESSMENT

# INTRODUCTION

In this report, Equity Trustees Superannuation Limited publishes the results of our annual assessment of how well the Personal Superannuation Bond 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

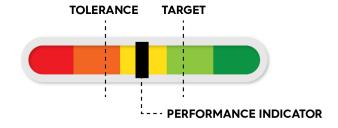
In conducting this assessment, we compared the product to other choice superannuation products included in statistical data published by the Australian Prudential Regulation Authority (comparable products) using the criteria in Part 6 of the Superannuation Industry (Supervision) Act 1993 and Prudential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

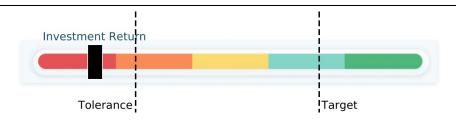


### **INVESTMENT RETURN**

**Outcomes** 

Investment return for a \$50,000 account balance in the product<sup>1,0</sup> is consistent with market indexes.

Our product's performance relative to comparable products



### Metrics

Ref	Metric Label	Value	Tolerance	Target
1.1	1-year actual net return	4.37%	5.72%	6.17%
1.2	3-year actual net return	3.49%	3.29%	4.03%
1.3	5-year actual net return	2.87%	3.07%	3.47%
1.4	10-year actual net return	4.05%	4.18%	4.95%

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, three, five and 10-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.

This commentary focuses on the five-year weighted average return to 30 June 2023. The 5 year term is a balance between capturing any shorter term developments with the longer term trend of return performance.

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

Over the five years to 30 June 2023 the product's weighted average investment return was outside of our tolerance level.

The Capital Guaranteed investment option is a significant contributor to the product's weighted average returns. As it's a lower-return product, members may wish to consider:

- other superannuation arrangements that may provide a greater return over the long term; and
- seeking advice on alternative investment arrangements that may be more suitable.

Fees, asset allocation, manager style and manager underperformance have also detracted from performance over the five-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.

### **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>. Our product's performance relative to Investment Risk comparable products Tolerance! **!**Target Metrics Ref Metric Label Value Tolerance Target Negative annual net returns over last 10 years 1.00 0.00 2.1 1.16

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

When reading this commentary, it's important to bear in mind that:

- we have focused on asset classes that have a material effect on the number of negative annual returns over the last 10 years; and
- 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 outside our tolerance level.

The contributing factors of the negative annual returns over the period were a combination of manager selection and the product's fees and costs in the following asset classes:

- Australian Shares; and
- International Shares.

While we cannot remove underperformance in the past, we have sought to protect member outcomes by optimising investment performance through changes to the investment strategy which we are seeing through the product's short term investment performance.

We therefore believe these changes ensured that the investment strategy for the product remained appropriate. No further action is required as a result of this assessment.



### **FEES AND COSTS**

# Outcomes Fees (gross of tax) for a \$50,000 account balance are consistent with market rates. 4.0 Our product's performance relative to comparable products Tolerance

Metrics	Ref	Metric Label	Value	Tolerance	Target
	4.1	Total fees	2.36%	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 <a href="https://resolutionlife.com.au/productupdates">https://resolutionlife.com.au/productupdates</a>; and
- 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.



### **MEMBER SERVICES**

#### Outcomes Administration services satisfy member expectations. Our product's performance relative to Administration Services comparable products Tolerance! Target Metric Label Value Tolerance Target Metrics Ref 8.1 Administration-related EDR complaints 10.10 3.50 1.50 8.2 Service Level Achievement 36.33% 80.00% 90.00% 0.38% 8.3 Administration fees 1.39% 0.62% 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 an 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.

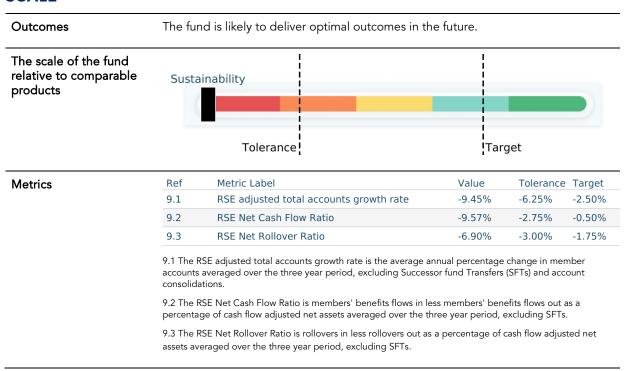
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  the fund's website <a href="https://resolutionlife.com.au/productupdates">https://resolutionlife.com.au/productupdates</a>; and
- will address further initiatives to improve the timeliness and quality of member services in the fund's Strategic Business 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**



### 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 an equal weighting of the above metrics.

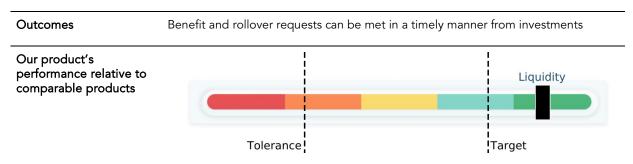
The fund is closed to new members and continues to be in run off with membership decreasing by 15% in FY23. It is expected to decrease at a slightly lower rate over the next 3 years.

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	Tolerance Target		
	10.1	Investment liquidity in a GFC scenario	91.80%	40.00%	80.00%	

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 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 Period			
Investment Option	Inception Date	Growth Ratio	Member Assets	1 Year	3 Years	5 Years	10 Years
Capital Guaranteed	1984-01-01	0%	\$2.4M	1.16%	0.69%	1.08%	2.07%
Guaranteed	1984-01-01	19%	\$0.1M	0.45%	0.01%	0.39%	1.40%
Managed	1984-01-01	71%	\$3.3M	6.85%	5.65%	4.27%	5.59%
Weighted Average		41%	\$5.8M	4.37%	3.49%	2.87%	4.05%

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	4.0%	4.3%	4.4%	4.4%	4.4%	4.4%		
3	3.2%	3.4%	3.5%	3.5%	3.6%	3.6%		
5	2.5%	2.8%	2.9%	2.9%	2.9%	2.9%		
10	3.7%	4.0%	4.1%	4.1%	4.1%	4.1%		

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.