

Summary of Conflicts Management Policy

This document summarises the Conflicts Management Policy ('the Policy') of Club Plus Superannuation Pty Limited. It outlines the Trustee's policies and procedures for managing conflicts of interest that may arise. The Policy has been designed to comply with APRA Standard SPS 521 "Conflicts of Interest" and the requirements of sections 52 and 52A of the *Superannuation Industry (Supervision) Act 1993* (SIS Act). This summary is issued in accordance with the requirements of SIS Regulation 2.38.

The Policy may be varied from time to time with approval from the Board. If material amendments are made a new summary will be disclosed within the timeframes required by law.

Who does this policy apply to?

The Trustee, Responsible Persons and all employees of the Trustees are required to comply with the policy and procedures contained within the Conflicts Management Policy. In particular the following processes must be adhered to:

- Identifying and monitoring all potential and actual conflicts;
- Evaluation of whether the identified conflict should be managed or avoided;
- Prioritisation of interest of beneficiaries;
- Managing the conflict; and
- Whistleblower provisions.

What is a conflict?

For the purposes of the Policy, a '**conflict**' is a reference to a conflict:

- a) Between the **duties** owed by an RSE licensee, or a responsible person of an RSE licensee, to beneficiaries and the **duties** owed by them to any other person;
- b) Between the **interests** of beneficiaries and the **duties** owed by an RSE licensee, or a responsible person of the RSE licensee, to any other person;
- c) Between a relevant **interest** of an RSE licensee, an associate of an RSE licensee or a responsible person of an RSE licensee and their **duties** to beneficiaries;
- d) Between a relevant **interest** of a RSE licensee, an associate of an RSE licensee or a responsible person of an RSE licensee and the **interests** of beneficiaries.

A table categorising conflicts is provided at the back of this summary.

What is a relevant duty?

A relevant duty refers to any duty owed by the RSE licensee, or a responsible person of the RSE licensee, to beneficiaries or to any other person.

What is a relevant interest?

A relevant interest of an RSE licensee, and associate of the RSE licensee or a responsible person of the RSE licensee refers to any interest, gift, emolument or benefit, whether pecuniary or nonpecuniary, directly or indirectly held by the RSE licensee, the associate or the responsible person that the RSE licensee has determined to be material.

What is the 'relevant' test?

In deciding that a duty or an interest is relevant, the Trustee must determine whether it is one that might reasonably be considered to have the potential to have a significant impact on the capacity of the Trustee or the responsible person with that duty or interest, to act in a manner that is consistent with the best interests of beneficiaries.

Objectives of the Policy?

The Policy articulates the Trustee's controls and processes for:

(a) Identifying and monitoring all potential and actual conflicts

Specifically, it details the mechanism to identify all potential or actual conflicts of interest that arise in relation to Club Plus and its responsible persons;

(b) Evaluation of whether the identified conflict should be managed or avoided

In particular detailing when a conflict is required to be avoided;

(c) Prioritisation of interests of beneficiaries

Where a decision has been made to manage a conflict, the mechanism for ensuring the conflict is managed in accordance with the requirements to give priority to the duties to, and interests of, beneficiaries in the SIS Act;

(d) Management of conflict

Ensuring that appropriate action is taken in the event of a conflict arising, including on-going management of the conflict and provision for escalation or alternative action if required;

(e) Recording of conflicts

Recording in the minutes of Board, Board Committee and other relevant meetings details of each conflict identified and the action taken to avoid or manage this conflict;

(f) Development and maintenance of Registers of Duties and Interests

A Register of Relevant Duties and a Register of Relevant Interests is maintained for each responsible person. These registers are maintained by the Secretary and presented at each Board meeting. The registers can also be found in the 'Regulatory Prescribed Information' section of our website, where it is updated quarterly.

Obligations to identify and monitor conflicts

Responsible persons must comply with all the requirements of this Policy, and have both a **collective** and **individual** responsibility to ensure that all potential and actual conflicts are reported on the Register of Relevant Duties and Register of Relevant Interests ('the Registers).

(a) Collective responsibility

In respect of collective responsibility, the Board and will give consideration of the Registers in the appointment of service providers or investment managers and the payment of sponsorship funds.

(b) Individual responsibility

In respect of individual responsibility, each Responsible Person will be required to make disclosures to the Registers:

- Upon becoming a Responsible Person;
- Upon an event occurring that may result in an actual or perceived conflict;
- At each Board and Committee meeting; and
- On an annual basis.

Evaluation of the Conflict

When a conflict is identified, the Trustee must evaluate that situation to determine how it should be managed. In particular, the Trustee must determine whether the situation:

- Is manageable; or
- Should be avoided.

Prioritisation to beneficiaries

Having identified a conflict, and agreeing that it is manageable, the Trustee is required to demonstrate how the duties of responsible persons to and the interests of beneficiaries will be prioritised.

Management of conflicts

Each actual or potential conflict identified for the Trustee and responsible persons will have a management plan attached to it.

Recording of conflicts

The Registers will record when these conflicts were initially raised and when they were considered in the Board or Board Committee making decisions.

Whistleblower Policy

In the event that an employee or responsible person of the Trustee becomes aware that a Responsible Person may have a non-disclosed relevant interest or relevant duty, they are encouraged to report such a circumstance in accordance with the Trustee’s Whistleblower Policy.

Table of Conflicts

Area of Conflict	Description
Service Provider Investments	Relationship with an existing or potential service provider to

	the Fund
	Personal investment that the Fund also invests in, or is about to invest in, where the value exceeds \$50,000
Sponsor	Relationship with an organisation that the Fund sponsors or potentially will sponsor
Insurance Claim	Becoming aware of an insurance claim where the responsible person may be perceived to be conflicted
Other Officer Disputes	Change in offices or directorship which may create an actual or potential conflict in being a service provider to the Fund
	Relationship with the complainant / disputant, the responsible person may be perceived to be conflicted
Gifts	Receiving a gift of a personal nature worth \$100 or more attributed to the responsible person's office with the Trustee