

Colonial Mutual Superannuation Pty Ltd

ABN 56 006 831 983

Summary of Conflicts Management Policy

Colonial Mutual Superannuation Pty Ltd (“CMS”) has an established conflicts management policy that outlines its requirements around the identification, avoidance and management of organisational and personal conflicts that may arise through the provision of our products and services.

Our conflicts management policy is a key component of our conflicts management framework and is a primary means for communicating our approach to the management of conflicts across CMS’s business operations in its capacity as RSE Licensee. The policy applies to CMS, its responsible persons and employees (collectively referred to as “our representatives”) and outlines how we:

- identify any relevant duties and relevant interests of CMS and its responsible persons;
- identify and monitor all potential and actual conflicts;
- avoid conflicts where required to so;
- manage a conflict (in the event of a conflict arising and cannot be avoided) ensuring that the conflict is managed in accordance with the requirements of our policy, with priority given to the duties to, and interests of, beneficiaries;
- ensure that appropriate action is taken in the event of a conflict arising, including ongoing evaluation of management of the conflict and provision for escalation or alternative action if required; and
- record in the minutes of relevant Board and committee meetings, details of each conflict identified and the action taken to avoid or manage the conflict.

Our representatives are required to be aware of circumstances that can give rise to a conflict and be able to identify when a conflict arises and disclose this information accordingly. Responsible persons are also required to disclose any relevant duties and relevant interests prior to their appointment and on an ongoing basis. Relevant duties and relevant interests of CMS as RSE Licensee and its responsible persons are recorded and maintained in the CMS RSE Licensee Register of Relevant Duties and Relevant Interests. For further information and content contained in this register please refer below.

Regular reviews and enquiries are also undertaken to ensure we identify all conflicts arising from CMS’s relationship, or the relationship of a responsible person or employee, with an existing or prospective service provider or adviser, including any conflicts that have the potential to affect the service provider’s performance in respect of the obligations undertaken for CMS’s business operations.

Compliance with our conflicts management policy is monitored on an ongoing basis to ensure it remains adequate and operating effectively.

Acknowledgements: APRA Superannuation Prudential Standard SPS521, APRA Superannuation Practice Guide SPG 521.

RSE Licensee Register of Relevant Duties and Relevant Interests

To assist in identifying potential and actual conflicts, CMS maintains a RSE Licensee Register of Relevant Duties and Relevant Interests. This register contains up-to-date information of any Relevant Duties and Relevant Interests that apply to CMS as RSE Licensee and its Responsible Persons.