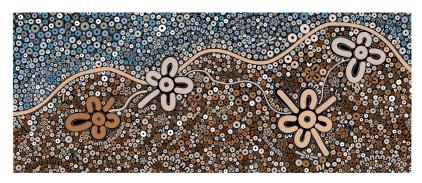


About this document and assessment

Issued by N.M. Superannuation Proprietary Limited (NM Super) ABN 31 008 428 322 AFSL 234654 RSE L0002523 as Trustee for the Wealth Personal Superannuation and Pension Fund (Wealth Fund) ABN 92 381 911 598. North is a registered trademark of NMMT Limited ABN 42 058 835 573. Incorporating North Super and North Pension. North Super and North Pension closed to new members in 2016.

Acknowledgment of country

N.M. Superannuation Proprietary Limited acknowledges all First Nations Peoples across Australia. We recognise the Traditional Custodians of the land and value the connection to Country, waterways and sky. We pay our respects to the Elders for their resilience, courage and wisdom; for ensuring the survival of this country's rich culture and heritage.







Introduction

N.M. Superannuation Proprietary Limited (NM Super) is the Trustee for AMP's superannuation and retirement savings with over \$111bn in funds under management and over 900,000 member accounts across two super funds, making us one of the largest superannuation providers in Australia.

North Super and Pension has approximately \$6bn in member assets and 37,000 member accounts. It is part of the Wealth Personal Superannuation and Pension Fund (Wealth Fund), one of Australia's largest super funds with over \$55bn in member funds and over 255,000 member accounts.

North Super and Pension provides members (via their financial advisers) access to a comprehensive menu of investments and retirement solutions. By making active investment choices, members can save and grow their super and, at the right time, convert their super savings into regular pension payments. North Super does not offer an authorised MySuper product.

As Trustee of your retirement savings, our purpose and vision is "to deliver sustainable and enhanced outcomes for all members" and to operate with autonomy and objectivity in providing the best possible superannuation and retirement outcomes for individual members.

Progress made against the Trustee's strategy

The Trustee and AMP are committed to enhancing outcomes for members and have continued this commitment throughout FY22/23 delivering the following for members of North and the Wealth Fund including:

- ✓ Rationalising non-contemporary style products.
- ✓ Investing in technology and improving digital services for advisers and members.
- ✓ Improving service experiences through the contact centre and transaction processing times.
- Continuing to review and enhance the selection of investments available to members and their advisers including managed portfolios.
- Uplifting governance and leadership to ensure members' retirement savings are well managed.

Commitment to improve outcomes for members

Given the progress made against the strategy to enhance outcomes for members, during 2023, the Trustee's strategy and objectives for members were refreshed. Key areas of focus in 2024 include:



Investment performance

Improving investment performance outcomes against benchmark returns and peers across a range of investments offered on the platform.



Enhance experience

Continuing to enhance service experiences across key member moments such as claims and improve the resolution time of complaints.



Support services

Ensuring our products and services suit members who no longer have a financial adviser.



ESG

Ensuring we integrate Environmental, Social and Governance (ESG) considerations into our product solutions.



Data security & fraud

Continuing to enhance data and fraud prevention capabilities.



Focus on efficiencies

Continuing to focus on operational efficiencies and value for money for members.

Assessing our performance

Each year, N.M. Superannuation Proprietary Limited (NM Super, the Trustee) is required to assess whether we are promoting the financial interests of members.

The Trustee's assessment compares how North performed for Choice accumulation and pension members during the financial year ending 30 June 2023 across the following key assessment factors:

- Investments and performance
- Fees and costs
- Scale and operating expenses
- Member experience
- Insurance offer

Assessment and determination

Investment performance

The North investment strategy, risk exposure and performance is appropriate for members. The investment menu continues to provide members with investment choice across different asset classes and different investment managers. The investment menu also provides members with access to different types of investments including managed funds, managed portfolios, direct shares, exchange traded funds, and term deposits. Members also have access to guarantees to help protect members investments. In the Wealth Fund, 26 investment options available for members failed the Government's annual performance test with 24 of these managed funds closed for new members.

Focus > Continue to review the investment option offering, including adding new investments to promote member choice and opportunities to build bespoke portfolios to meet member needs and remove investments that no longer meet performance or risk objectives. Continue to manage member outcomes as it relates to the superannuation Annual Performance Test.

Fees and costs

Administration fees and cost arrangements for North Super and Pension are considered **appropriate** and competitive across the two investment menus and for all member cohort balances. Investment option fees vary across the platform and fees were reduced during the period with some options receiving fee rehates

Focus > Continue to review and monitor investment fees across all investment options and impacts to performance outcomes.



Scale and operating costs

The Wealth Fund is one of the largest wrap platforms in Australia with more than \$55bn in assets and approximately 255,000 member accounts. The Trustee considers fund operating costs as **appropriate** and below the industry median for APRA regulated super funds. While cashflows into North Super and Pension were negative, there were overall positive flows into the Wealth Fund which is important for future scale advantages and ongoing investment into products and services.

Focus > Continue growing the membership and cashflows into the Wealth Fund through adviser relationships to support scale benefits.

Member experience

Member services are considered **appropriate** for the Trustee's target members and their advisers. The platform has a diverse menu offer with comprehensive online reporting and transaction capabilities. Service standards have improved throughout the year.

Focus > Continued focus on enhancing digital functionality, reducing complaints and improving their resolution times.

Insurance offer

Retail insurance arrangements are considered **appropriate** with claims acceptance rates and insurance service standards meeting expectations.

Focus > Continue to consider the types of insurance available through the platform and improve claims administration handling times for Total and Permanent Disability insurance.



Investments & performance

Investment performance

A wrap platform is designed to offer members and their adviser investment choice. North Super and Pension offers a wide range of investment options including single and multi-sector managed funds (with access to active, passive, and socially responsible investment approaches), managed portfolios, direct shares, exchange traded funds, term deposits, and retirement solutions.

The North Super and Pension investment menu offers members access to 800+ investment options across managed funds, managed portfolios, exchange traded funds, a range of term deposits, and direct shares on the S&P/ASX300¹.

Managed portfolios

Managed portfolios are designed to deliver a flexible and efficient means of investing and gaining exposure to different asset classes and assets. There are partnerships with an extensive range of investment managers leveraging their portfolio construction expertise to design unique portfolios that invest in a broad range of assets.

All managed portfolios are continuously evolving and are supported by ongoing technology enhancements through the North platform that enable the delivery of new features each year. As at 30 June 2023, there was approximately \$8.50bn in funds under administration in managed portfolios through the Wealth Fund.



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Term deposits and rates

In FY22/23 we offered a range of term deposit providers which included AMP Bank, Adelaide Bank, and ANZ. This was recently expanded to include NAB. We also offer a comprehensive range of term deposit maturities ranging from 1-month terms to 5-year terms. Term deposit rates are updated regularly and found online at northonline.com.au/client/investment-options/term-deposits.

Your North Super and Pension account uses a cash account that operates as a hub for all transactions. The cash account is used to manage essential functions such as contributions, distributions, withdrawals, pension payments, fees, and insurance premiums. The menu also offers a highly competitive cash rate of 4.20%pa as at 30 June 2023.

Investment strategy and governance

The investment strategy for North Super and Pension is to give members access to leading Australian and international investment markets and investment managers with a range of asset allocations to accommodate varying risk appetites. There is flexibility to enable members to switch investment options, implement investment strategies that are tailored to their needs, and create portfolios to complement their risk appetites.

The Trustee's investment governance framework outlines the structures, policies and processes for managing investment options. This is supported by expert independent investment advice provided by JANA Investment Advisers.

During FY22/23, we continued to actively assess investment options against a number of metrics including performance and investment management capability. These metrics support decision making for the addition and removal of investment options. In FY22/23, assessment processes were extended to include the superannuation Annual Performance Test (APT).

¹The number of investment options includes open and closed investment options. Generally, closed investment options are still available for existing investors to use, but no new investors can select them.

Investment menu monitoring and approvals

In FY22/23, 183 new investment options were added to North Super and Pension and we closed or removed 61 investment options that were not meeting the Trustee's objectives.

Level of investment risk

The North Super and Pension investment menu spans the investment risk spectrum and caters for different risk/return preferences that members may have. Generally, different asset classes and different investment approaches will determine the risk profile of an investment option. Investment risk is monitored using several metrics including volatility, standard risk measure (SRM) and liquidity.

Based on the Morningstar peer groups², it was found that 33% of managed funds offered through North have relatively lower risk characteristics compared to industry peers over one year, noting that the peer group may include managed funds with different investment strategies and benchmarks within the same asset class.

SRM is an industry metric that shows the expected number of years that an investment may experience a negative return over a 20-year period. The 2023 review of SRMs indicated that investment options were within expected SRM ranges for each asset class. As part of the Trustee's governance processes, the liquidity profile of investment options were assessed to ensure they continue to meet the needs of members. There were no material exceptions identified.

Investment performance

Annual performance test (APT)

In FY22/23, the superannuation APT was introduced by the Australian Government for platform superannuation products. The superannuation APT is administered by the Australian Prudential Regulatory Authority (APRA).

In FY22/23, the number of investment options subject to the superannuation APT assessment that failed to meet the FY22/23 superannuation APT outcome was 26. This represented 4% of managed funds available to members. Investment options that failed the FY22/23 superannuation APT have had their portfolio design reviewed with a number of strategic asset allocation changes made.

Of the 26 investment options that failed the FY22/23 superannuation APT, 24 of these have since been closed to new members with the remaining 2 open due to their specific design characteristics. We continue to monitor these investment options for any further changes that may be required to ensure that they continue to meet the needs of members.

Performance against peers and benchmarks

The North Super and Pension investment menu offers members investment choice and spans different asset classes and different investment approaches, which will determine the return experience.

Based on Morningstar peer groups, we found that 38% of managed funds offered through North performed better than industry peers over the year to 30 June 2023, noting that the peer group may include managed funds with different investment strategies and benchmarks within the same asset class.

Members should refer to their annual statements for individual performance experience, including individual rate of return. Your member performance will be impacted by any transactions on your account.

² Morningstar Australia (Morningstar) is a data provider to the financial services industry. Morningstar groups managed funds into peer group categories which can be reasonably considered to be close investment alternatives (for example, the tax treatment and legal characteristics of the managed funds are the same, or benchmarks, asset class and/or total exposures to various sectors are similar) and for which performance and other measures, such as fees, are comparable.

Retirement Solutions

Guaranteed options

We've been offering Super and Pension Guarantees to protect Wealth Fund members' capital for over 15 years. As at 30 June 2023, North Super and Pension Plan members have around 3,600 individual guarantees protecting around \$700m. During the year to 30 June 2023, North Guarantee holders locked in an additional \$1.6m in protected balances which means that, if markets fall, members may receive a higher benefit payment when the guarantee matures.

During the year to 30 June 2023, North Guarantee holders received approximately \$6.9m in Guarantee Benefit payments on maturity or early lapse (including death) of their Guarantees. Guarantee Benefit payments represent the surplus return to members over the value of their investments from holding the Guarantee.

Outlook & actions to improve outcomes

To ensure continual improvement in members outcomes, the Trustee is focused on:

- Assessing options which are in the best interest of members for those investment options which failed the APT. This may include transferring members to similar, but better performing options.
- Reviewing the investment option offering, including adding new investments to promote member choice and
 opportunities to build bespoke portfolios to meet member needs and remove investments that no longer meet
 performance or risk objectives.
- Enhancing the range of retirement solutions available for members.



Fees and Costs

The fee and cost arrangements for North Super and Pension are appropriate and one of the most competitive in the wrap platform market. This assessment was completed for 30 June 2023. Pricing changes were implemented on 1 October 2023.

North Super and Pension has structured its fees on its two types of investment menus, being a broad "Discounted" menu with 80 investment options and an advanced "Standard" menu with over 800 investment options.

Basis for setting fees

The basis for setting fees is to meet the operating expenses of the product including establishment and administration of member accounts, member and advice services, product management, technology and functionality on the North Platform.

The basis for setting fees is also formed on the target membership. Wrap platforms are designed for members with typically higher than average account balances with adviser relationships, seeking choice and flexibility in superannuation savings and retirement.

Administration fee structures

Administration fees paid by members depends on the proportion of their account value in the 'Discounted' and/or 'Standard' investment menu, each of which has different pricing.

North charges a \$91 per annum account fee for each account held³. Members may benefit from account grouping to reduce administration fees paid.

Using the analysis from Chant West's Wrap Comparator Tool, we compared North Super and North Pension administration fees against the benchmark products reported by Chant West. We tested account balances of \$50k, \$100k to \$1 million at intervals of \$100k, \$1.2 million, \$1.5 million and \$2 million as at June 2023. We found that:

- North Super "Discounted" and "Standard" administration fees were competitive (lower than median/lower than competitor averages) for all balances tested when compared to Chant West peer products⁴, apart from North Super "Standard" at \$100k, where administration fees were just above median.
- North Pension "Discounted" and "Standard" administration fees were competitive (lower than median/lower than competitor averages) for all balances tested when compared to Chant West peer products⁵, apart from North "Standard" at a balance of \$100k, where administration fees were just above median.

North Super and Pension administration fees for a \$50k balance, which is used for APRAs Annual Performance Test, rank 1st against peers for the Discount Menu. When 'Standard' menu fees are compared against peers, North is competitive and below the median.



North's fee and cost arrangements are competitive when compared to a range of wrap platform peers.

³ The account fee is waived for non-commutable allocated pensions and accounts with a guarantee.

⁴The North Super "Discounted" menu was compared to 8 peer products and the North Super "Standard" menu was compared to 38 peer products.

⁵ The North Pension "Discounted" menu was compared to 8 peer products and the North Pension "Standard" menu was compared to 36 peer products.

Account linking and maximum administration fees

The maximum administration fee a North member will pay (inclusive of account fee) is \$2,400 per annum across any menu selection for each North account held.

Accounts of up to six family members can also be linked for the purposes of fee calculations (up to 6 accounts each) in order to reduce fees for the group. The aggregate balance is used to calculate the fee that will apply to each account and is based on the account opening date.

Investment fees

Fees paid by members for investments will depend on various factors, including the investment option selected, how actively the investment is managed and often the balance invested. Management fees will vary between investments (even within the same asset class) and are set independently by fund managers (as product issuers). These factors, along with a member's investment objective and risk appetite, will mean that each member's overall investment fee rate will vary.

Outlook and actions

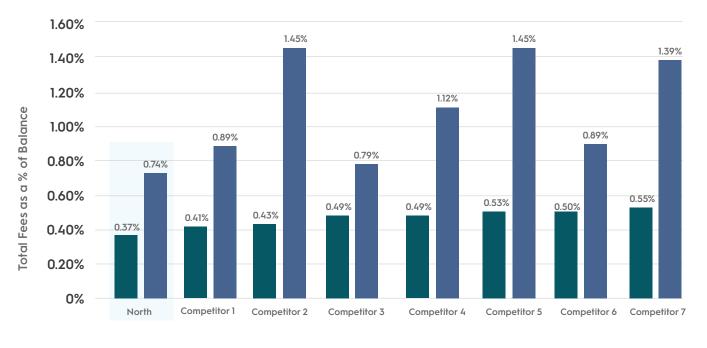
Pricing changes effective 1 October 2023

We simplified the way administration fees are calculated and charged on MyNorth and North Super and Pension on 1 October 2023. This included how the percentage-based administration fee and the account fee are charged as well as changes to the maximum and minimum administration fee and fee aggregation. We also simplified our investment menus and introduced a new Trustee fee.

The main aim of these changes was to simplify our pricing, make it more transparent and comparable in market and to more fairly represent the cost to serve a member in the Fund.

Based on analysis using data from Chant West, the fee changes implemented on 1 October indicates that North is one of the most competitive wrap platforms across its two menus. The North Standard menu is very competitive across the \$50K, \$100K, \$250K, \$500k and \$1m member balance bands.

NORTH CHOICE MENU ADMINISTRATION FEE



\$250,000 Balance \$50,000 Balance

Scale & operating expenses

Size and fund growth

The Wealth Fund size and scale is considered appropriate. At 30 June 2023, the Wealth Fund had approximately \$55bn in member assets and 255,000 member accounts, ranking in the top quartile of super funds in Australia. This size enables the Trustee and AMP to continually invest in product, service and investment outcomes for members and to attract and retain high quality employees.

Cashflows

While net cashflows into the Wealth Fund were positive, they were lower than the prior year, largely as a result of weaker market conditions, higher cost of living pressures and fewer members seeking financial advice. Cashflows into North were approx -\$880m.

Pension payments made from the Wealth Fund increased during the period with approximately \$1.7bn in regular income stream payments made to 90,000 pre-retirees and retirees. The Wealth Fund is one of Australia's largest pension funds in Australia.



\$1.7 billion in regular income stream payments made to 90,000 pre-retirees and retirees

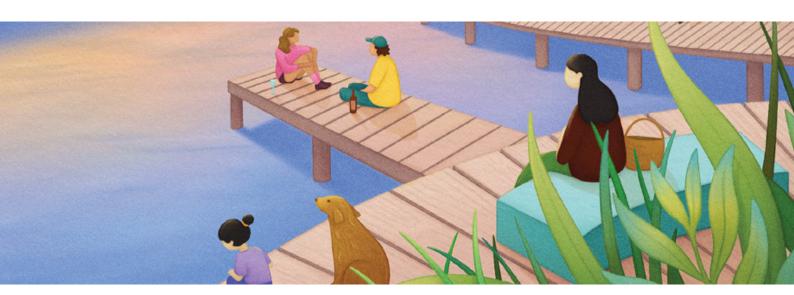
Operating expenses

NM Super outsources platform administration services to NMMT Limited (NMMT), a related party of NM Super and part of the AMP Group. The Trustee continually ensures that members receive value for money regarding the services and fees paid to service providers.

Operating costs are assessed as appropriate. In addition to the associated costs of operating the fund, costs reflect the platforms product features and level of benefits offered to members. Operating costs as a proportion of members assets was 0.28%, which is better than the median result for APRA regulated super funds.

Importantly, given the nature of outsourced arrangements the Trustee has in place for the AMP Group, members do not directly pay for operational costs such as errors, fines, remediation, and regulatory changes. Instead, these costs are incurred by the AMP Group.

In late 2023, NMMT and NM Super negotiated increases to platform administration service (PSA) fees. These fee changes were due to changes in the operating environment including rising operating costs due to inflation and the additional products and services introduced to members to enhance retirement outcomes. As a result, fee changes for some member cohorts were introduced from 1 October 2023. These changes will be reflected in FY23/24 Outcomes Assessment.



Source: APRA Annual Statistics as at 30 June 2023.

Member experience

The Trustee considers member services, including options, benefits and facilities as appropriate for members of North.

Improving products and services

Key to ensuring quality products and leading services are provided to members, is measuring and monitoring feedback from both members and their advisers. Independent research is used to help assess and compare products and services.

Satisfaction

Internal member and adviser satisfaction scores through call center interactions were above target. Members advocacy and satisfaction of financial advisers is also measured against peers using external research from Investment Trends and NMG Consulting. While these are below the Trustee's objectives, gradual improvements are being made.

Complaints

Resolving complaints fairly and in a timely manner is important. Often complaints are complex and complaint resolution timeframes are below our targets. The Trustee and AMP are focused on improving the member experience and also using insights from member complaints to make service and product improvements.

We also work closely with the Australian Financial Complaints Authority (AFCA) to ensure we reach fair outcomes for members. Our AFCA complaint resolution timeframes remain compliant as at 30 June 2023.

Contact centre and administration services

The Trustee's goal is to deliver leading member and adviser service experiences. The following improvements were made in FY22/23:

- Redesigning our service model based on member and adviser needs.
- Improving services levels and processing times.
- Investing in technology enhance member their adviser's experiences.

Platform features and functionality

The Platform offer is competitive and is appropriate for our target membership of for a 'mass affluent' investors on the wrap platform.

Financial services research firm Investment Trends awarded the North Platform 'Most Improved' platform in the market for 2023.

The technology platform capabilities available include:

- Digital consents and signature for members.
- Data security via multi-factor authentication.
- Data feeds into financial adviser planning software.
- A contemporary member and adviser online portal with mobile app.
- Same day buying and selling of assets.
- Comprehensive reporting for members and adviser's including performance and asset information.
- Simple to use Records of Advice for members and their advisers.

Members and their advisers are offered a range of calculators, tools and features including fee calculators, retirement modelling, guarantee illustrations, family linking, fee caps and competitive cash rates on transaction accounts.

Financial advice

Many North members have a financial adviser relationship. In addition to financial advice provided by many independently licensed financial advisers across the nation, members also have access to financial advice provided by AMP, one of Australia's oldest and largest financial advice networks.

Previously advised members

North is designed for members who have a financial adviser. We are actively improving services and the functionality of the platform for members who are no longer using a financial adviser.

Outlook and actions

In FY23/24 there will be continued focus on improving services to members and their advisers including:

- Enhancing platform functionality for members and their advisers to give greater flexibility and control.
- Implementing strategies to increase administration and contact centre service levels to deliver consistent quality outcomes for members and their advisers.
- Efficiently and effectively resolving complaints, including addressing the root cause and speed of resolution.
- Reviewing and implementing services for members that no longer have an active ongoing advice relationship to ensure product and service arrangements are fit for purpose.



Members and their advisers are offered a range of calculators, tools and features:

- fee calculators
- retirement modelling
- guarantee illustrations
- · family linking
- · fee caps
- competitive cash rates





Insurance offering

Through North Super and Pension, members can obtain retail insurance cover from TAL and AIA Australia. The insurance available to members balances cost with the level of benefits.

North Super members can choose from Life, Total and Permanent Disability (TPD) and Income Protection (IP) insurance. North Pension members can apply for Life insurance. TAL and AIA Australia provide competitive offers with additional benefits such as rehabilitation, wellness and adviser education programs which further strengthen their proposition.

Some North members may also hold retail insurance cover closed to new applications. Existing members with this cover may continue to hold and amend their insurance.

Insurance affordability

While members with insurance have selected the type and level of insurance cover to meet their needs, usually through the help of a financial adviser, members are reminded of the risks that insurance premiums may pose to retirement income streams.

Claims outcomes

Claims acceptance rates for members were better than industry averages and the time taken to assess claims was well within industry benchmarks for Life and IP. Average TPD claim duration was outside the industry established benchmark, however better than average industry performance.

While claims dispute levels for TPD and IP were higher than the industry benchmark, claims acceptance rates and processing times were better than the benchmark. The Trustee will continue to monitor disputes to ensure the right decisions are made.

North Super and Pension

as at 30 June 2023

\$6bn

in member assets in North Super and Pension

\$55bn

Net member assets in the Wealth Fund. Top quartile by size and one of the largest platforms regulated by APRA

Over 37,000

member accounts in North Super and Pension

Over 255,000

member accounts in the Wealth Fund

0.28%

Fund operating expense to assets

27,040 members have insurance cover

\$170k

Average account balance in North Super and Pension

\$216k

Average account balance in the Wealth Fund

-\$880m

Cashflows for North in FY22/23

\$650m

Cashflows into the Wealth Fund in FY22/23

\$1.67bn

In retirement payments from the Wealth Fund with **\$27bn** in pension assets.

One of the largest super funds in Australia for pension payments and assets.

Access to over

450

managed funds and 67 publicly available managed portfolios



Fund Demographics

64%

Of accounts in accumulation phase

36%

Of accounts in pension phase

50%

Of members have saved with us for greater than 15 years

56% male

44% female

61 Average age

Further information

For more information about the investment objectives, fees and costs and risk associated with investing in superannuation please refer to the North Super and Pension Product Disclosure Statement and Target Market Determination.

For information on the Wealth Personal Superannuation and Pension Fund, which offers the North Super and Pension plans, please refer to the Wealth Personal Superannuation and Pension Fund Annual Report 2022/23.

The information provided in this Product Determination is general information only. It is not financial product advice nor is it a substitute for obtaining proper financial advice that is tailored to your personal circumstances, financial goals and needs. It's important to remember past performance is not an indicator of future performance.

All information in this Product Determination was obtained from sources the Trustee considers to be reliable, however it does not guarantee it is accurate, free of errors or complete. You shouldn't rely upon it. The Trustee doesn't accept any liability for any resulting loss or damage whatsoever to a reader or any other person.

Contact us

