



Bendigo Superannuation Conflicts Management Framework Summary

OVERVIEW

BACKGROUND

Bendigo Superannuation Pty Ltd ABN 23 644 620 128 (Bendigo Super) is the trustee and registrable superannuation entity (RSE) licensee of The Bendigo Superannuation Plan. It is a subsidiary of Bendigo and Adelaide Bank Limited (the Bank).

The Bendigo Super Board is responsible for ensuring it has an adequate conflicts management framework that complies with its legal and regulatory obligations.

PURPOSE

The Bendigo Super Conflicts Management Framework (CMF) outlines Bendigo Super's approach to the management of conflicts of interest. The CMF's objective is to ensure Bendigo Super identifies and avoids, or prudently manages all perceived, potential and actual conflicts of interest that arise in its business operations.

The fundamental principle of the framework is to ensure that the best financial interests of RSE beneficiaries are prioritised and met despite a conflict arising.

DEFINITIONS

For the purposes of this framework, following terms are defined below.

Term	Description
Conflict	<p>A reference to a 'conflict' is a conflict:</p> <ul style="list-style-type: none"> • between the duties owed by Bendigo Super, or a responsible person of Bendigo Super to beneficiaries and the duties owed by them to any other person; • between the interests of beneficiaries and the duties owed by Bendigo Super or a responsible person of Bendigo Super, to any other person; • between an interest of Bendigo Super, an associate of Bendigo Super or a responsible person or an employee of Bendigo Super, and Bendigo Super's duties to beneficiaries; and • between an interest of Bendigo Super, an associate of Bendigo Super, or a responsible person or an employee of Bendigo Super, and the interests of beneficiaries. <p>Perceived, actual, and potential conflicts are contemplated and managed.</p>
Relevant duty	A relevant duty refers to any duty owed by Bendigo Super, or a responsible person of Bendigo Super, to beneficiaries or to any other person.
Relevant interest	A relevant interest of Bendigo Super, an associate of Bendigo Super or a responsible person of Bendigo Super refers to any interest, gift, emolument or benefit, whether pecuniary or non-pecuniary, directly or

Term	Description
	indirectly held by Bendigo Super, the associate or the responsible person that Bendigo Super has determined to be relevant

FRAMEWORK

1 CONFLICTS OF INTEREST WORKFLOW

All perceived, potential or actual conflicts that are identified will be managed in accordance with this process.



1.1 Identification Interests and Duties

The identification of relevant interests and duties provides a means to identify perceived, potential and actual conflicts. Bendigo Super undertakes a regular structured approach to identify interests and duties that may result in a conflict of interest.

Bendigo Super responsible persons, staff and related stakeholders have an obligation to report potentially relevant material interests and duties.

1.2 Assessment for Relevance

All duties and material personal interests identified must be assessed for relevance. To be assessed as relevant, the interest or duty must have the potential to have a significant impact on Bendigo Super's capacity to act in a manner that is consistent with the best financial interests of beneficiaries.

It is also considered that material service provider engagements have the potential to have a significant impact on the best financial interests of beneficiaries.

1.3 Conflicts Management

The Board is responsible for the management of conflicts within Bendigo Super.

Bendigo Super will avoid conflicts where possible following approved governance arrangements.

Conflicts that can be effectively managed will be managed using the following practices:

- making public disclosures through a product disclosure statements, statutory reporting (annual reports) or publicly available information (website disclosures).
- segregating organisational structures (by duties and by activities).
- actively managing participation in potentially conflicted scenarios (physical or information barriers) and escalating decision making as required.
- use of independent experts to validate regard to best financial interest duties to beneficiaries.

Bendigo Super's management of conflicts of interest procedures.

Bendigo Super has established procedures to address known potential conflict situations that arise in the course of performing its superannuation operations. These procedures are documented in the Bendigo Super's management of conflicts of interest procedures and are approved by Bendigo Super's Audit Risk and Compliance Committee and/or the Board.

The procedures set out the appropriate action to take in the event a conflict arises including the ongoing evaluation of the management of the conflict, any escalation or any alternative action required.

1.4 Recording and Monitoring

Bendigo Super uses a number of registers to record conflicts of interest (perceived, potential and actual) and procedures to manage these as they arise.

2 CULTURE AND TRAINING

Bendigo Super aims to achieve a strong conflicts management culture, as part of its risk and compliance culture, where each staff member owns risk management and compliance, and immediately identifies, reports and addresses any conflicts (perceived or apparent, potential or actual), risks, and risk events (including regulatory and internal breaches). Failure to report is, and will continue to be, treated very seriously.

A training program for conflicts of interest is required to be completed by all staff.

3 RELEVANT REGULATION

The CMF sets out the obligations to comply with:

- Corporations Act 2001; AFSL holder general obligations and associated ASIC Regulatory Guides;
- Superannuation Industry (Supervision) Act 1993 and APRA Prudential Standard SPS 521 Conflicts of Interest; and
- General Law.