

**Register of relevant duties and interests
Bendigo Superannuation Pty Ltd (Bendigo Super)**

Relevant duties and interests of Bendigo Super

Entity	Duty
Bendigo Superannuation Pty Ltd is a wholly owned subsidiary of its parent entity, the Bendigo and Adelaide Bank	Bendigo Super has a duty to act in the best interest of its parent entity, subject to where the interests of beneficiaries and the parent entity conflict, in which case the duty is owed to beneficiaries of the Bendigo Superannuation Plan.
Bendigo Superannuation Pty Ltd in its capacity as RSE licensee	Bendigo Super has a duty to comply with terms of agreements to which it is a party, including service agreements entered with other parties (this may include payment of fees and other amounts to those other parties).
Entity	Interest
The Bendigo Superannuation Plan	The Bendigo Superannuation Plan has deposits in and use of basic banking products issued by Bendigo and Adelaide Bank. Interest income is received and banking fees are paid by The Bendigo Superannuation Plan.
The Bendigo Superannuation Plan	The Bendigo Superannuation Plan has investments in managed funds issued by Sandhurst Trustees, a wholly owned subsidiary of the Bendigo and Adelaide Bank. Trust capital and income is received and fees are paid by The Bendigo Superannuation Plan
Bendigo Superannuation Pty Ltd	Bendigo Super has deposits in and use of basic banking products issued by Bendigo and Adelaide Bank. Interest income is received and banking fees are paid by Bendigo Super.
Bendigo and Adelaide Bank	Bendigo Super receives resources supplied by its parent and may pay costs to the Bendigo and Adelaide Bank for these resources.
Bendigo and Adelaide Bank	Bendigo Super may pay a fee to Bendigo and Adelaide Bank, whose corporate authorised representatives being the Community Banks' may provide a dealing service which involves assisting prospective customers in applying for or acquiring the Bendigo Superannuation Plan.

**Responsible Persons Register of relevant personal duties and personal interests
Bendigo Superannuation Pty Ltd (Bendigo Super)**

Relevant duties and interests of Gary Williams - Non-executive Director

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management
Non-executive Director of Bendigo Super	Wholly owned subsidiary of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited as the sole shareholder of Bendigo Super	There is a risk that commercial and business requirements of Bendigo and Adelaide Bank and its subsidiaries may be prioritised over the interests of beneficiaries of Bendigo Super.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. nonaffiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

**Responsible Persons Register of relevant personal duties and personal interests
Bendigo Superannuation Pty Ltd (Bendigo Super)**

Relevant duties and interests of Tony Hodges - Non-executive Director

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management
Non-executive Director of Bendigo Super	Wholly owned subsidiary of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited as the sole shareholder of Bendigo Super	There is a risk that commercial and business requirements of Bendigo and Adelaide Bank and its subsidiaries may be prioritised over the interests of beneficiaries of Bendigo Super.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. nonaffiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

**Responsible Persons Register of relevant personal duties and personal interests
Bendigo Superannuation Pty Ltd (Bendigo Super)**

Relevant duties and interests of Mary Latham - Non-executive Director

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management
Non-executive Director of Bendigo Super	Wholly owned subsidiary of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited as the sole shareholder of Bendigo Super	There is a risk that commercial and business requirements of Bendigo and Adelaide Bank and its subsidiaries may be prioritised over the interests of beneficiaries of Bendigo Super.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. nonaffiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

**Responsible Persons Register of relevant personal duties and personal interests
Bendigo Superannuation Pty Ltd (Bendigo Super)**

Relevant duties and interests of Paul Rohan - Executive Director

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management
Employee of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited (parent entity of Bendigo Super)	Bendigo and Adelaide Bank Limited shareholders	There is a risk that business requirements of Bendigo and Adelaide Bank may be prioritised over those of Bendigo Super	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.
Executive Director of Bendigo Super	Wholly owned subsidiary of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited as the sole shareholder of Bendigo Super	There is a risk that commercial and business requirements of Bendigo and Adelaide Bank and its subsidiaries may be prioritised over the interests of beneficiaries of Bendigo Super.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

Type of interest / context	Interest	Risk	Management
Annual salary - Employed by Bendigo and Adelaide Bank	Annual salary package	There is a risk that individual Key Performance Indicators (KPIs) may be prioritised over the best interests of beneficiaries of Bendigo Super to meet personal performance objectives and measures to retain employment and salary increases.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. nonaffiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.
Personal investments in Bendigo Super or related body corporate financial products	Beneficial interests held in managed funds issued by Sandhurst Trustees Limited	<p>The risk arises upon Bendigo Superannuation Pty Ltd deciding to include or remove Bendigo and Adelaide Bank or Sandhurst products (which a personal interest may be held) from the investment menu.</p> <p>There is a risk that individual circumstances may be prioritised over the interests of beneficiaries.</p>	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

Relevant duties and interests of Paul Rohan - Executive Director

<p>Personal investments in Bendigo Super or related body corporate financial products</p>	<p>Beneficial interests held in Bendigo SmartStart Super, issued by Bendigo Super</p>	<p>There is a risk that decisions are made in the best interests of the individual (personal interests within BSSS) over best interests of other beneficiary demographics within Bendigo Superannuation Pty Ltd</p>	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests. 	
<p>Personal investments in Bendigo Super or related body corporate financial products</p>	<p>Unit Holder in Sandhurst Trustees Limited Funds through personal Superannuation funds</p>		<p>No risk identified</p>	

Responsible Persons Register of relevant personal duties and personal interests

Relevant duties and interests of Susan Kamler - Company Secretary				
Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management
Employee of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited (parent entity of Bendigo Super)	Bendigo and Adelaide Bank Limited shareholders	There is a risk that business requirements of Bendigo and Adelaide Bank may be prioritised over those of Bendigo Super	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. nonaffiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.
Secretary of: - Bendigo Super and - Sandhurst Trustees Limited and its subsidiary	Wholly owned subsidiaries of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited as the sole shareholder of Bendigo Super and Sandhurst Trustees Limited. <i>Note: Sandhurst Trustees Limited is the sole shareholder of Sandhurst Nominees (Victoria) Ltd.</i>	There is a risk that commercial and business requirements of Bendigo and Adelaide Bank and its subsidiaries may be prioritised over the interests of beneficiaries of Bendigo Super.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

Relevant duties and interests of Susan Kamler - Company Secretary			
Type of interest / context	Interest	Risk	Management
Annual salary - Employed by Bendigo and Adelaide Bank	Annual salary package	There is a risk that individual Key Performance Indicators (KPIs) may be prioritised over the best interests of beneficiaries of Bendigo Super to meet personal performance objectives and measures to retain employment and salary increases.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. nonaffiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

**Responsible Persons Register of relevant personal duties and personal interests
Bendigo Superannuation Pty Ltd (Bendigo Super)**

Relevant duties and interests of Justin Hoare - Executive Officer

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management
Employee of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited (parent entity of Bendigo Super)	Bendigo and Adelaide Bank Limited shareholders	There is a risk that business requirements of Bendigo and Adelaide Bank may be prioritised over those of Bendigo Super	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. nonaffiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.
Executive officer of: - Bendigo Super and - Sandhurst Trustees Limited and its subsidiary	Wholly owned subsidiaries of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited as the sole shareholder of Bendigo Super, Sandhurst Trustees Limited, Bendigo Financial Planning Limited and Leveraged Equities Limited. <i>Note: Sandhurst Trustees Limited is the sole shareholder of Sandhurst Nominees (Victoria)Ltd.</i>	There is a risk that commercial and business requirements of Bendigo and Adelaide Bank and its subsidiaries may be prioritised over the interests of beneficiaries of Bendigo Super.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

Relevant duties and interests of Justin Hoare - Executive Officer

<p>Executive officer of Sandhurst Trustees Limited</p>	<p>Sandhurst Trustees Limited is a related body corporate of Bendigo Super.</p>	<p>Beneficiaries of financial products issued by Sandhurst Trustees Limited</p>	<p>There is a risk that the managed fund products (and their investors) of Sandhurst Trustees Limited are prioritised when deciding to include or remove managed fund products from Bendigo Super's investment menu.</p>	<p>1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.</p>
<p>Type of interest / context</p>	<p>Interest</p>	<p>Risk</p>	<p>Management</p>	
<p>Annual salary - Employed by Bendigo and Adelaide Bank</p>	<p>Annual salary package</p>	<p>There is a risk that individual Key Performance Indicators (KPIs) may be prioritised over the best interests of beneficiaries of Bendigo Super to meet personal performance objectives and measures to retain employment and salary increases.</p>	<p>1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.</p>	

Relevant duties and interests of Justin Hoare - Executive Officer

<p>Personal investments in Bendigo Super or related body corporate financial products</p>	<p>Beneficial interests held in managed funds issued by Sandhurst Trustees Limited</p>	<p>The risk arises upon Bendigo Superannuation Pty Ltd deciding to include or remove Bendigo and Adelaide Bank or Sandhurst products (which a personal interest may be held) from the investment menu. There is a risk that individual circumstances may be prioritised over the interests of beneficiaries.</p>	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.
<p>Participation bonus scheme - as a senior employee of Bendigo and Adelaide Bank</p>	<p>Value Created Dividend (VCD) Plan (allocation of Bendigo and Adelaide Bank shares)</p>	<p>There is a risk that individual Key Performance Indicators (KPIs) may be prioritised over the best interests of beneficiaries of Bendigo Superannuation Pty Ltd to meet personal performance objectives and measures to participate in the VCD Plan.</p>	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.

**Responsible Persons Register of relevant personal duties and personal interests
Bendigo Superannuation Pty Ltd (Bendigo Super)**

Relevant duties and interests of Richard Morice - Responsible Person

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management
Employee of Bendigo and Adelaide Bank Limited	Bendigo and Adelaide Bank Limited (parent entity of Bendigo Super)	Bendigo and Adelaide Bank Limited shareholders	There is a risk that business requirements of Bendigo and Adelaide Bank may be prioritised over those of Bendigo Super	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. The role reports to the Chair of the Board and is accountable to the Board. 3. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 4. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 5. Disclosure documents and public disclosure of relevant duties and interests.

Relevant duties and interests of Richard Morice - Responsible Person

Type of interest / context	Interest	Risk	Management
Annual salary - Employed by Bendigo and Adelaide Bank	Annual salary package	There is a risk that individual Key Performance Indicators (KPIs) may be prioritised over the best interests of beneficiaries of Bendigo Super to meet personal performance objectives and measures to retain employment and salary increases.	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and Approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). 4. Disclosure documents and public disclosure of relevant duties and interests.
Personal investments in Bendigo Super or related body corporate financial products	Unit Holder in Sandhurst Trustees Limited Funds through personal Superannuation funds	<p>The risk arises upon Bendigo Superannuation Pty Ltd deciding to include or remove Bendigo and Adelaide Bank or Sandhurst products (which a personal interest may be held) from the investment menu.</p> <p>There is a risk that individual circumstances may be prioritised over the interests of beneficiaries.</p> <p>There is a risk that individual circumstances may be prioritised over the interests of beneficiaries.</p>	<ol style="list-style-type: none"> 1. Organisational structure including separation of duties and activities across the RSE Licensee and the broader Bendigo and Adelaide Bank Group (e.g. RSE Board has a composition of majority independent directors (i.e. non-affiliated to Bendigo and Adelaide Bank)). 2. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers). 3. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant). <p>Disclosure documents and public disclosure of relevant duties and interests.</p>

**Responsible Persons Register of relevant personal duties and personal interests
Bendigo Superannuation Pty Ltd (Bendigo Super)**

Relevant duties and interests of Hayley Watson – RSE External Auditor

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management
Partner at Ernst & Young (ABN 75 288 172 749)	RSE Auditor of the Bendigo Superannuation Plan	Members and beneficiaries to the Bendigo Superannuation Plan.	<p>Business requirements of Ernst & Young may be prioritised over those of members and beneficiaries of the Bendigo Superannuation Plan.</p> <p>The Bendigo Superannuation Plan pays audit fees to Ernst & Young for these audit services.</p>	<p>1. Audit partner is subject to annual fit & propriety testing</p> <p>2. Annual declaration of independence obtained and assessed</p> <p>3. Audit plan presented and consider by Audit Risk and Compliance Committee of the RSE Licensee</p> <p>4. Disclosure of audit fees</p>