

Register of relevant duties and interests Bendigo Superannuation Pty Ltd (Bendigo Super)		Admin Columns		
Relevant duties and interests of Bendigo Super				
Entity	Duty	Relevance to RSE Licensee Role		Public Disclosure
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.	Yes		Yes
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).	Yes		Yes
Entity	Interest	Relevance to RSE Licensee Role	Is it material?	Public Disclosure
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.	Yes	Yes	Yes
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	Yes	Yes	Yes
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.	Yes	Yes	Yes
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.	Yes	Yes	Yes
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.	Yes	Yes	Yes

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

Admin Columns

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

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management	Relevance to RSE Licensee Role		Public Disclosure
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. non-affiliated to Bendigo and Adelaide Bank)). 2. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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. 	Yes		Yes
Type of interest / context	Interest		Risk	Relevance to RSE Licensee Role	Is it material?	Public Disclosure	
Personal investments in Bendigo Super or related body corporate financial products	Deposits in and use of basic banking products issued by Bendigo and Adelaide Bank		No risk identified	No	No	No	

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

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

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management	Relevance to RSE Licensee Role	Is it material?	Public Disclosure
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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes		Yes
Non-executive Director of Australian Friendly Society	Australian Friendly Society has engaged Sandhurst Trustees Limited (a related body corporate of Bendigo Super) to perform its material business activities	Members of Australian Friendly Society	Assessed as no risk (no disclosure required)		No		No
Type of interest / context	Interest		Risk	Management	Relevance to RSE Licensee Role	Is it material?	Public Disclosure
Personal investments in Bendigo Super or related body corporate financial products	Deposits in and use of basic banking products issued by Bendigo and Adelaide Bank		No risk identified		No	No	No
Personal lending	Bendigo and Adelaide Bank Loan facility including credit card, personal loan or home loan		No risk identified		No	No	No
Personal Shareholdings	Shares held in PBS Limited, who has a franchise agreement with Bendigo and Adelaide Bank		Beneficial shareholder	1. Disclosure of conflicts 2. Transactions undertaken at arms length	No	No	No
Consultancy remuneration - IOOF Investment Committee	Consultancy remuneration benefits		There is a risk that personal interests (consultancy fees) may be prioritised over the best interests of beneficiaries of BSPL in order to retain consultancy remuneration when making decisions to renew or remove IOOF as a material service provider.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries 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	No	No	No

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

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

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management	Relevance to RSE Licensee Role		Public Disclosure
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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes		Yes
Type of interest / context	Interest	Risk	Management	Relevance to RSE Licensee Role	Is it material?	Public Disclosure	
Personal investments in Bendigo Super or related body corporate financial products	Deposits in and use of basic banking products issued by Bendigo and Adelaide Bank	No risk identified		No	No	No	

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

Admin Columns

Relevant duties and interests of Paul Rohan - Executive Director

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management	Relevance to RSE Licensee Role		Public Disclosure
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	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes		Yes
Executive Director of: - Bendigo Super - Sandhurst Trustees Limited and its subsidiary - Bendigo Financial Planning and - Leveraged Equities Limited and its subsidiaries	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 (Vic) Limited, and Leveraged Equities Limited is the sole shareholder of Pirie Street Custodian Ltd and Adelaide Equity Finance Pty 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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes		Yes
Executive Director of Sandhurst Trustees Limited	Sandhurst Trustees Limited is a related body corporate of Bendigo Super.	Beneficiaries of financial products issued by Sandhurst Trustees Limited	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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes		Yes

Relevant duties and interests of Paul Rohan - Executive Director							
Executive Director of: - Bendigo Financial Planning and - Leveraged Equities Limited	Bendigo Financial Planning Limited and Leveraged Equities Limited are related body corporates of Bendigo Super.	Beneficiaries of financial products and/or services provided by Bendigo Financial Planning Limited and Leveraged Equities Limited	Assessed as no risk to Bendigo Super.		No		No
Executive Director of Australian Friendly Society	Australian Friendly Society has engaged Sandhurst Trustees Limited (a related body corporate of Bendigo Super) to perform its material business activities	Members of Australian Friendly Society	Assessed as no risk (no disclosure required)		No		No
Director of the Financial Services Council	Financial Services Council is a financial services industry body	Members of Financial Services Council	Assessed as no risk to Bendigo Super, as Bendigo Super does not have a membership with the Financial Services Council (FSC) at this time. Risk is upon decision for Bendigo Super to obtain a membership with FSC.	1. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).	No		No
Type of interest / context	Interest		Risk	Management	Relevance to RSE Licensee Role	Is it material?	Public Disclosure
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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes	Yes	Yes
Personal investments in Bendigo Super or related body corporate financial products	Beneficial interests held in managed funds issued by Sandhurst Trustees Limited		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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes	No	Yes

Relevant duties and interests of Paul Rohan - Executive Director							
Personal investments in Bendigo Super or related body corporate financial products	Beneficial interests held in Bendigo SmartStart Super, issued by Bendigo Super		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>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)).</p> <p>2. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries.</p> <p>3. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).</p> <p>4. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant).</p> <p>5. Disclosure documents and public disclosure of relevant duties and interests.</p>	Yes	Yes	Yes
Personal investments in Bendigo Super or related body corporate financial products	Deposits in and use of basic banking products issued by Bendigo and Adelaide Bank		No risk identified		No	No	No
Personal investments in Bendigo Super or related body corporate financial products	Unit Holder in Sandhurst Trustees Limited Funds through personal Superannuation funds		No risk identified		No	No	No
Personal lending	Bendigo and Adelaide Bank Loan facility including credit card, personal loan or home loan		No risk identified		No	No	No
Personal Shareholdings	Shares held in Bendigo and Adelaide Bank		There is a risk that commercial interests of Bendigo and Adelaide Bank may be prioritised over the beneficiaries of Bendigo Superannuation Pty Ltd to achieve personal gain through shareholder returns. Shareholding and ability to impact the Bendigo and Adelaide Bank share price and dividend is considered to be not material.		No	No	No
Participation bonus scheme as a senior employee of Bendigo and Adelaide Bank	Value Created Dividend (VCD) Plan (allocation of Bendigo and Adelaide Bank shares)		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>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)).</p> <p>2. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries.</p> <p>3. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).</p> <p>4. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant).</p> <p>5. Disclosure documents and public disclosure of relevant duties and interests.</p>	No	No	No

Responsible Persons Register of relevant personal duties and personal interests					Admin Columns		
Relevant duties and interests of Melissa Lovell - Company Secretary					Relevance to RSE Licensee Role		Public Disclosure
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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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. 	Yes		Yes
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 (Vic) Limited.</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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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. 	Yes		Yes

Relevant duties and interests of Melissa Lovell - Company Secretary				Relevance to RSE Licensee Role	Is it material?	Public Disclosure
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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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. 	Yes	Yes	Yes
Personal investments in Bendigo Super or related body corporate financial products	Beneficial interests held in managed funds issued by Sandhurst Trustees Limited	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.	<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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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. 	No	No	No
Personal investments in Bendigo Super or related body corporate financial products	Deposits in and use of basic banking products issued by Bendigo and Adelaide Bank	No risk identified		No	No	No

Relevant duties and interests of Melissa Lovell - Company Secretary							
Personal investments in Bendigo Super or related body corporate financial products	Unit Holder in Sandhurst Trustees Limited Funds through personal Superannuation funds		No risk identified		No	No	No
Personal lending	Bendigo and Adelaide Bank Loan facility including credit card, personal loan or home loan		No risk identified		No	No	No
Personal Shareholdings	Shares held in Bendigo and Adelaide Bank		There is a risk that commercial interests of Bendigo and Adelaide Bank may be prioritised over the beneficiaries of Bendigo Superannuation Pty Ltd to achieve personal gain through shareholder returns. Shareholding and ability to impact the Bendigo and Adelaide Bank share price and dividend is considered to be not material.		No	No	No
Participation bonus scheme - as a senior employee of Bendigo and Adelaide Bank	Value Created Dividend (VCD) Plan (allocation of Bendigo and Adelaide Bank shares)		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.	<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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries 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 	No	No	No

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

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Relevant duties and interests of Justin Hoare - Executive Officer

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management	Relevance to RSE Licensee Role		Public Disclosure
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	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes		Yes
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 (Vic) Limited.</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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes		Yes

Relevant duties and interests of Justin Hoare - Executive Officer							
Type of interest / context	Interest	Risk	Management	Relevance to RSE Licensee Role	Is it material ?	Public Disclosure	
Executive officer of Sandhurst Trustees Limited	Sandhurst Trustees Limited is a related body corporate of Bendigo Super.	Beneficiaries of financial products issued by Sandhurst Trustees Limited	<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)).</p> <p>2. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries.</p> <p>3. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).</p> <p>4. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant).</p> <p>5. Disclosure documents and public disclosure of relevant duties and interests.</p>	Yes		Yes	
Committee member of the Financial Services Council (superannuation)	Financial Services Council is a financial services industry body	Members of Financial Services Council	<p>Assessed as no risk to Bendigo Super, as Bendigo Super does not have a membership with the Financial Services Council (FSC) at this time.</p> <p>Risk is upon decision for Bendigo Super to obtain a membership with FSC.</p> <p>1. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).</p>	No		No	
Annual salary - Employed by Bendigo and Adelaide Bank	Annual salary package	<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)).</p> <p>2. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries.</p> <p>3. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).</p> <p>4. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant).</p> <p>5. Disclosure documents and public disclosure of relevant duties and interests.</p>	Yes	Yes	Yes		

Relevant duties and interests of Justin Hoare - Executive Officer							
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>	<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)).</p> <p>2. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries.</p> <p>3. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).</p> <p>4. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant).</p> <p>5. Disclosure documents and public disclosure of relevant duties and interests.</p>	Yes	No	Yes
Personal investments in Bendigo Super or related body corporate financial products	Deposits in and use of basic banking products issued by Bendigo and Adelaide Bank		No risk identified		No	No	No
Personal investments in Bendigo Super or related body corporate financial products	Unit Holder in Sandhurst Trustees Limited Funds through personal Superannuation funds		No risk identified		No	No	No
Personal lending	Bendigo and Adelaide Bank Loan facility including credit card, personal loan or home loan		No risk identified		No	No	No
Personal Shareholdings	Shares held in Bendigo and Adelaide Bank		<p>There is a risk that commercial interests of Bendigo and Adelaide Bank may be prioritised over the beneficiaries of Bendigo Superannuation Pty Ltd to achieve personal gain through shareholder returns.</p> <p>Shareholding and ability to impact the Bendigo and Adelaide Bank share price and dividend is considered to be not material.</p>		No	No	No
Participation bonus scheme as a senior employee of Bendigo and Adelaide Bank	Value Created Dividend (VCD) Plan (allocation of Bendigo and Adelaide Bank shares)		<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>	<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)).</p> <p>2. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries.</p> <p>3. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).</p> <p>4. Use of independent experts to validate regard to best interest duties to beneficiaries (where relevant).</p> <p>5. Disclosure documents and public disclosure of relevant duties and interests.</p>	No	No	No

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Bendigo Superannuation Pty Ltd (Bendigo Super)**

Admin Columns

Relevant duties and interests of Richard Morice - Responsible Person

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management	Relevance to RSE Licensee Role		Public Disclosure
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	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.	Yes		Yes
Committee member of the Financial Services Council (superannuation)	Financial Services Council is a financial services industry body	Members of Financial Services Council	Assessed as no risk to Bendigo Super, as Bendigo Super does not have a membership with the Financial Services Council (FSC) at this time. Risk is upon decision for Bendigo Super to obtain a membership with FSC.	1. Adherence with governance frameworks, policies and approved delegation parameters by actively managing participation in potentially conflicted scenarios (physical or information barriers).	No		No

Relevant duties and interests of Richard Morice - Responsible Person				Relevance to RSE Licensee Role	Is it material ?	Public Disclosure
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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 3. Adherence with governance frameworks, policies and approved delegation parameters and 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. 	Yes	Yes	Yes
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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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. 	Yes	No	Yes
Personal investments in Bendigo Super or related body corporate financial products	Deposits in and use of basic banking products issued by Bendigo and Adelaide Bank	No risk identified		No	No	No
Personal investments in Bendigo Super or related body corporate financial products	Unit Holder in Sandhurst Trustees Limited Funds through personal Superannuation funds	No risk identified		No	No	No
Personal lending	Bendigo and Adelaide Bank Loan facility including credit card, personal loan or home loan	No risk identified		No	No	No

Relevant duties and interests of Richard Morice - Responsible Person

<p>Personal Shareholdings</p>	<p>Shares held in Bendigo and Adelaide Bank</p>		<p>There is a risk that commercial interests of Bendigo and Adelaide Bank may be prioritised over the beneficiaries of Bendigo Superannuation Pty Ltd to achieve personal gain through shareholder returns. Shareholding and ability to impact the Bendigo and Adelaide Bank share price and dividend is considered to be not material.</p>		<p>No</p>	<p>No</p>	<p>No</p>
<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>	<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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.</p>	<p>No</p>	<p>No</p>	<p>No</p>

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

Admin Columns

Relevant duties and interests of Richard Anderson - Responsible Person

Type of duty / context	Duty in relationship to	Duties owed to	Risk	Management	Relevance to RSE Licensee Role		Public Disclosure
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	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes		No
Type of interest / context	Interest	Risk	Management	Relevance to RSE Licensee Role	Is it material?	Public Disclosure	
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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes	Yes	Yes	

Relevant duties and interests of Richard Anderson - Responsible Person						
Personal investments in Bendigo Super or related body corporate financial products	Beneficial interests held in managed funds issued by Sandhurst Trustees Limited	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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	No	No	No
Personal investments in Bendigo Super or related body corporate financial products	Deposits in and use of basic banking products issued by Bendigo and Adelaide Bank	No risk identified		No	No	No
Personal investments in Bendigo Super or related body corporate financial products	Unit Holder in Sandhurst Trustees Limited Funds through personal Superannuation funds	No risk identified		No	No	No
Personal lending	Bendigo and Adelaide Bank Loan facility including credit card, personal loan or home loan	No risk identified		Yes	No	No
Personal Shareholdings	Shares held in Bendigo and Adelaide Bank	There is a risk that commercial interests of Bendigo and Adelaide Bank may be prioritised over the beneficiaries of Bendigo Superannuation Pty Ltd to achieve personal gain through shareholder returns. Shareholding and ability to impact the Bendigo and Adelaide Bank share price and dividend is considered to be not material.		Yes	No	No
Participation bonus scheme as a senior employee of Bendigo and Adelaide Bank	Value Created Dividend (VCD) Plan (allocation of Bendigo and Adelaide Bank shares)	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.	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. Oversight of employee governance decisions by the Office of the Superannuation Trustee whose role is to promote the best interests of beneficiaries. 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.	Yes	No	No