

Sunsuper Pty Ltd

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Sunsuper Pty Ltd
Sunsuper Superannuation Fund
Sunsuper Financial Services Pty Ltd
Sunsuper Pooled Superannuation Trust
Precision Administration Services Pty Ltd
Sunsuper Infrastructure Trust 3

Conflicts Management Policy

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1. Overview

This Conflicts Management Policy is designed to ensure that the Board has a **conflicts management framework** for the Sunsuper Group which meet the requirements of:

- APRA Superannuation Prudential Standard *SPS 521 Conflicts of Interest*, and APRA Superannuation Prudential Practice Guide *SPG 521 Conflicts of Interest*
- The relevant provisions of the *Superannuation Industry (Supervision) Act 1993* that apply to Sunsuper Pty Ltd as a RSE licensee including sections 52(2)(d) and 52A(2)(d);
- Section 912A(1)(aa) of the *Corporations Act 2001* and ASIC's *Regulatory Guide 181 Licensing: Managing conflicts of interest* that applies to the Sunsuper Group's Australian Financial Service (AFS) licensees and their Authorised Representatives;
- The common law fiduciary obligations of trustees, financial services licensees and their authorised Representatives;
- The general duties applying to company directors, under the *Corporations Act 2001*; and
- Industry best practice and risk management practices as it applies to a financial services business and workplace.

To aid understanding of this Policy the key sections are summarised in the table below:

Sections	Purpose
1-7	Overview, definitions and explanation of a conflict.
8	Obligations impacting all Sunsuper Representatives.
9	Obligations impacting Sunsuper Group directors, Responsible Persons and Responsible Managers only.
10	Reference to other Sunsuper policies with conflict obligations - all Sunsuper Representatives.
11	MAP of related policies and guidelines and Registers and Accountability.
12	Administrative Obligations.

2. Key Obligation

Section 1 of Prudential Practice Guide 521 - Conflicts of Interest states:

"An RSE licensee is required to ensure that where a conflict arises and has not been avoided, the duties to, and interests of, beneficiaries receive priority of any duties to, or interests of, other persons."

3. Purpose

The purpose of the Policy is to assist with the management of conflicts across the entirety of the Sunsuper Group's business operations within a conflicts management framework designed to ensure that all potential and actual conflicts of interests in the Sunsuper Group's business operations are identified and that all reasonably practicable actions are taken to ensure that they are avoided or prudently managed.

The Policy will be effective if it mitigates and manages the risk that a conflict may result in the Trustee acting improperly to the detriment of Beneficiaries. It should also mitigate and manage the risk that the Trustee may be perceived to have acted improperly, which may affect the reputation of its business operations.

4. Responsibility

Ownership of key obligations under this Policy are set out in table below:

Who	Obligation
Board	Overview, monitoring and enforcement of Policy.
Company Secretary	Development and maintenance of the Policy and controls for compliance with Policy and relevant Registers as outlined in section 10.
Other Sunsuper Executive General Managers	Development and maintenance of related policies, systems, processes and Registers as outlined in section 10.
Sunsuper Representatives	Compliance with Policy and lodging of incidents/breaches in Breach Register as appropriate.

5. Scope

The Policy applies to all Sunsuper Representatives except for those requirements that apply only to Responsible Persons or to Sunsuper Representatives who are authorised to provide financial product advice on behalf of any of the Sunsuper Groups' AFS Licensees. The Policy applies to all activities of the Sunsuper Group and the entirety of its business operations.

The Policy also applies to independent committee members and experts in relation to the work they perform for the Sunsuper Group.

6. Definitions

Associate - means any person who is an "associate" as defined in section 12 of the *Superannuation Industry (Supervision) Act 1993*.¹

- a) Director or secretary of the Trustee;
- b) Related Body Corporate of the Trustee;
- c) Director or secretary of any Related Body Corporate of the Trustee;
- d) Person in partnership with whom the Trustee carries on a financial services business;
- e) Person who is a partner of the Trustee otherwise than because of carrying on a financial services business in partnership with the Trustee where the Trustee knew, or ought to have known, at that time, the material particulars of the matter.
- f) Trustee of a trust in relation to which the Trustee benefits, or is capable of benefitting, otherwise than because of transactions entered into in the ordinary course of business in connection with the lending of money;
- g) A person in concert with whom the Trustee is acting, or is proposing to act, or a person with whom the Trustee is, or proposes to become, associated, whether formally or informally, in any other way in respect of the matter to which the associate reference relates, other than merely as a result of the Trustee or the third party:
 - giving advice to, or acting on behalf of the other. in the proper performance of functions attaching to a professional capacity or a business relationship; or
 - being appointed as a proxy or representative for the other at a meeting of members of a body corporate, where there is no valuable consideration given by the other or their associates for such appointment.

Australian Financial Services (AFS) Licensee - Sunsuper Pty Ltd and the wholly owned companies Sunsuper Financial Services Pty Ltd and Precision Administration Services Pty Ltd, each of which hold separate AFS Licences.

ACRMC - The Audit Compliance and Risk Management Committee of the Board.

Beneficiaries - means:

- Members;
- Beneficiaries of the Sunsuper Pooled Superannuation Trust; and
- Any other beneficiary within the Trustee's business operations as a RSE Licensee.

Authorised Representative - Any person authorised to act as a representative of an AFS licensee within the Sunsuper Group and to provide financial product advice within the scope of their authority.

Conflict - See section 6 and section 7.1 for discussion of what is a conflict of interest and a conflict of duty.

Conflicts Investigation Committee (CIC) - Sunsuper Group committee comprising the Chair of the Audit Compliance Risk Management Committee, General Counsel and the Chief Risk Officer which is responsible for co-ordinating the response to;

- Ethicsline disclosures pursuant to Whistleblower Policy, and

¹ Amendment in October 2019 to define Associate above after applying the provisions of the SIS Act to the Corporations Act definition and applying it to Sunsuper's position.

- Conflicts management issues of a significant nature **and** at request of a member of this Committee, the CEO, the Sunsuper Board Chair, the Sunsuper Board, the ACRMC, any Sunsuper Board Committee and/or Company Secretary or delegate.

Conflicted Remuneration - Any benefit (monetary or non-monetary) given to an AFS Licensee or an Authorised Representative of an AFS Licensee who provides financial product advice to retail clients which could reasonably be expected to influence the choice of financial product or advice provided to a retail client.

Connected Entity - Has the meaning given to that expression in section 10(1) of the SIS Act.

Group or Sunsuper Group - Includes the Trustee (in its personal capacity and in its capacity as trustee of the Sunsuper Superannuation Fund, the Sunsuper Pooled Superannuation Trust, and the Sunsuper Infrastructure Trust 3) and all Connected Entities and all related bodies corporate and all other companies and entities controlled by the Trustee.

Material Conflict - A conflict which might reasonably be considered, or be perceived, to have the potential to:²

- Have a significant impact on the capacity of the person who has the conflict to act in a manner that is consistent with their responsibilities or duties; or
- Adversely affect the reputation of Sunsuper Group if not managed appropriately.

Whilst it is not possible to provide an exhaustive list of what will constitute a Material Conflict, some examples are:

- a) A spouse or immediate family member working for a vendor tendering to provide services to the Sunsuper Group; or
- b) A spouse or immediate family member making a TPD claim with the Sunsuper Group.

Material Personal Interest - a benefit, pecuniary or non-pecuniary, which flows directly or indirectly to a director, that is sufficient to influence the exercise of their personal duties to the Trustee or relevant company.

Member - A member of the Sunsuper Superannuation Fund.

Nominated Director - a director of the Trustee nominated by an employer representative shareholder or member representative shareholder of the Trustee.

Partner - includes a spouse, former spouse, de facto partner (including partners of the same sex), former de facto partner, "life" partners, persons engaged in a domestic partnership or a close personal relationship.

Relevant Duty - Refers to any duty owed by the Trustee or by its Responsible Persons to the Beneficiaries or to any other person or entity that the Trustee has determined is relevant because it might reasonably be considered to have the potential to have a significant impact on the capacity of the Trustee or the Responsible Person with the relevant duty to act in a manner that is consistent with the best interests of Beneficiaries.

Relevant Interest - A relevant interest of the Trustee, an Associate of the Trustee or a Responsible Person of the Trustee refers to any interest, gift, emolument or benefit, whether pecuniary or non-pecuniary, directly or indirectly held by the Trustee, the Associate or the Responsible Person that the Trustee has determined is relevant because it might reasonably be considered to have the potential to have a significant impact on the capacity of the Trustee, the associate of the Trustee or the Responsible Person holding the relevant interest to act in a manner that is consistent with the best interests of Beneficiaries.

² Definition of a Material Conflict in October 2019.

Responsible Persons - Each or any of the following persons:

- a) A director of the Trustee;
- b) A secretary of the Trustee;
- c) A Senior Manager of the Trustee; or
- d) An RSE auditor, RSE Actuary or other person as outlined in Sunsuper's Fit and Proper Policy.

RSE Actuary - A person appointed as actuary of the Sunsuper Superannuation Fund.

RSE Auditor - A person appointed as an auditor of the Sunsuper Superannuation Fund or the Sunsuper Pooled Superannuation Trust.

RSE Business Operations includes all activities as an RSE licensee (including the activities of each RSE of which it is the licensee), and all other activities of the RSE licensee to the extent that they are relevant to, or may impact on, its activities as an RSE licensee.

RSE Licensee - Has the meaning given to that expression in section 10(1) of the SIS Act.

Senior Manager - All persons in relation to the Trustee as an RSE Licensee as defined in paragraph 16 of SPS 520.

SIS Act - The Superannuation Industry (Supervision) Act 1993.

SPS 520 - APRA Superannuation Prudential Standard 520 - Fit and Proper.

SPS 521 - APRA Superannuation Prudential Standard 521 - Conflicts of Interest.

Sunsuper Representative - Each and any of the following:

- a) Sunsuper Group Directors;
- b) Responsible Persons;
- c) Employees of any of the Sunsuper Group;
- d) Authorised Representatives;
- e) Contractors of the Sunsuper Group; or
- f) Consultants of the Sunsuper Group.

Trustee - Sunsuper Pty Ltd, as trustee and RSE Licensee for the Sunsuper Superannuation Fund, the Sunsuper Pooled Superannuation Trust and the Sunsuper Infrastructure Trust 3.

7. What are Conflicts?

For the purposes of this Policy, a reference to a "conflict" is a reference to a conflict:

- a) Between the duties owed by the Trustee or a Responsible Person of the Trustee to Beneficiaries or a class of Beneficiaries (collectively), **and** the duties owed by them to any other person (including to an individual Beneficiary);³
- b) Between the interests of Beneficiaries, **and** the duties owed by the Trustee or a Responsible Person of the Trustee to any other person;
- c) Between an interest of the Trustee, an Associate of the Trustee, a Responsible Person of the Trustee or a Sunsuper Employee, **and** the Trustee's duties as an RSE Licensee to Beneficiaries;
- d) Between an interest of the Trustee, an Associate of the Trustee, a Responsible Person of the Trustee or a Sunsuper Employee, **and** the interests of the Beneficiaries.

Whilst the law relating to conflicts of duty and interest is complex, the courts are generally of the view that a person must not put themselves in a position where their duty to one person actually conflicts or may conflict with their personal interest and/or other duties. However there must be a **'real sensible possibility' of conflict and not just some theoretical or abstract possibility of a conflict.**

³ "including to an individual Beneficiary" and "or a class of Beneficiaries(collectively)" in 7 (a) recommended in October 2019.

Appendix 3 sets out some examples of potential conflicts that may arise in relation to a Sunsuper Representative and the actions you may be required to take.

8. Policy-Obligations - All Sunsuper Representatives

The Policy requires the Trustee and all Sunsuper Representatives, including all associates of the Trustee to:

- Identify;
- Disclose any actual, perceived or potential conflicts;
- Manage; and
- Avoid where possible.

It also requires certain records to be kept (see section 7.4).

Sunsuper expects all Sunsuper Representatives to avoid placing themselves in a position where there is a **real sensible possibility** of conflict between their own interests and duties to other persons and the interests of and duties to the Trustee and to Beneficiaries.

Remember the test outlined in section 7 is whether there is a '*real sensible possibility*' of conflict and not just some theoretical or abstract possibility of a conflict.'

8.1 Identifying Conflicts-Responsibility of all Sunsuper Representatives

It is the responsibility of all Sunsuper Representatives to identify any conflicts that arise in their own individual situation, and if so consider whether or not they are Material Conflicts. Any fact or circumstance which might constitute a conflict or give the appearance of such a conflict (known as a perceived conflict) should be either avoided or dealt with, and in any case, promptly reported in accordance with clause 8.2 so it may be assessed and evaluated to determine an appropriate course of action.

A conflict occurs when either the personal and private interests or activities (financial or otherwise) of a Sunsuper Representative conflicts with their official duties and responsibilities by interfering with the interests of each or any members of the Sunsuper Group and its Members, and potentially adversely influences the exercise of their independent judgement in the performance of one or more duties. To put it another way, a conflict arises when a party has more than one interest in the decision that is being made and those interests are not aligned or conflict.

A conflict can arise in respect of one's own **interest** (what is best for me personally) and in respect of one's professional responsibility or duty.

It is also possible for a person to have responsibilities or duties to more than one individual or group (for example an employee who is also a director or a company owned by the Trustee). This is called a **conflict of duty**.

Conflicts of interest and conflicts of duty are two different things but can be identified and managed in the same way. For the purposes of this Policy the term "conflicts" is used to describe both conflicts of interest and conflicts of duty.

It is not possible to list all situations, interests or relationships which might create a conflict of interest however the Appendices describe some examples of potential and actual conflicts as a guide only. These examples are not a definitive list of all possible conflicts.

8.2 Reporting the Conflict - Responsibility of all Sunsuper Representatives

Prompt and full disclosure is a critical part of the Sunsuper Group's conflicts management framework. If a Sunsuper Representative thinks that they have, or may have, a conflict (including something that others could reasonably perceive as a conflict), they must report it in a timely manner as follows:

- Firstly discuss with your Manager (and where relevant the procurement team if it relates to a potential vendor). Once reported the Manager will assess the nature and materiality

- of the reported conflict or perceived conflict and will discuss and determine with you whether it is a 'Material Conflict' which should be disclosed to the Company Secretary; and
- Secondly, conflicts which you and/or your Manager consider to be Material Conflicts should be disclosed to the Company Secretary at CompanySecretariat@sunsuper.com.au who will further consider whether or not the conflict:
 - is a Material Conflict; and/or
 - should be referred to the General Counsel for advice and/or to the Conflicts Investigation Committee and take steps, or ensure steps are taken, to manage / close out the potential conflict to ensure it is properly managed.

Matters can also be escalated to the Company Secretary or delegate for their guidance. The Company Secretary may also escalate significant issues to the CIC for guidance.

Collection of personal information under the Conflicts Management Policy

Sunsuper collects the personal information of Sunsuper Representatives and other individuals, to assist in the management of conflicts of interest and in doing so to comply with our legal and regulatory obligations. If this information was not collected, it may result in Sunsuper breaching the law or otherwise failing to meet regulatory obligations. We would not normally disclose this information outside Sunsuper, but in some circumstances may disclose it to our auditor or legal advisers. All information provided under this Policy will be handled in accordance with our Privacy Policy, which can be found at sunsuper.com.au/privacy. If you have a conflict, and the information you provide to Sunsuper includes information about another person, if appropriate in the circumstances you should bring this paragraph, and Sunsuper's Privacy Policy, to the other person's attention.

The information required by the Company Secretary is set out below.

Name of Sunsuper Person with Conflict, or If an external party: • Name of individual; • Organisation; and • Name of Sunsuper Person identifying the conflict.	If Relevant Contract / Tender Details.	Relevant Duty or Interest (if known).	Explanation of Potential Conflict.	Action to Manage or Avoid Conflict.	Name of Manager of Sunsuper Person.	Effective Date of Disclosure to Company Secretary.
MMM GGG	ABC contract or Tender for xx commencing Oct 2019	For example: 'spouse is a director of vendor in a tender'.	For example: 'spouse is a director of vendor in a tender'.	For Example: • Disclosure; • No involvement in procurement or contract renewal; and • Other...	xxx	10 Oct 2019

8.3 Sunsuper Registers

The Company Secretary will enter the information set out above for Material Conflicts into the relevant Register which will be disclosed to Sunsuper group directors and management. Information relating to conflicts assessed as non- material is retained.

8.4 Training and Education

Directors and other Responsible Persons and Sunsuper Representatives of the Trustee must undertake both induction and ongoing learning and development programs designed to ensure that they all clearly understand:

- a) The need to identify all potential conflicts;
- b) The circumstances that might give rise to a conflict;
- c) The content and purpose of the Trustee's conflicts management framework; and
- d) Their obligations including those obligations applying to Responsible Persons of the Trustee.

Authorised Representatives providing financial product advice also undertake ongoing learning and development in dealing with conflicts of interest matters as a regular part of their

continuing professional development, in addition to undertaking the induction and annual ongoing learning and development for all Sunsuper Representatives.

All Sunsuper Representatives receive both induction and annual ongoing learning and development on conflicts management through the Sunsuper Group Technical Education Training program co-ordinated by the People and Culture team.

8.5 Related Party Transactions

APRA Prudential Reporting Standard SRS 331.0 (SRS 331.0) addresses RSE expenditure on related party arrangements.

Any transaction entered into by the Sunsuper Group involving a related party who is not a Sunsuper Member, including all Sunsuper Representatives, shall be on terms and conditions no more favourable to the related party than those which it is reasonably expected would be the case if the benefit directly or indirectly was paid to a third party dealing at arm's-length in the same circumstances and on commercial terms.

Before any related party transaction is entered into, Sunsuper will satisfy itself that the fees to be paid to the related party are approximately equivalent to what would be paid to a third party at arm's-length for the same services.

Details of all transactions involving a related party shall be advised to the Company Secretary and placed in a Register of Related Party Interests. The Company Secretary is responsible for maintaining the Register of Related Party Interests.

Where required, details of related party transactions will be reported in the annual financial statements as required by the Australian Accounting Standard *AASB 124 - Related Party Disclosures* and to APRA in accordance with SRS 331.0.

The Trustee will subject material related party arrangements and contracts to the same scrutiny as other service providers, including reviews of performance and fees.

8.6 Requirements - Power of Attorney/Will Executor

No Sunsuper Representative may act as a Power of Attorney or as a Will Executor for any member of the Sunsuper Superannuation Fund or for any Sunsuper Group financial advice client unless the person is a related family member;

8.7 Market Research/Engagement with Potential Service Providers

The Trustee recognises the practical realities and difficulties of formally ascertaining conflicts where Sunsuper is carrying out market research and/or engagement with potential service providers prior to any formal tender or due diligence process. However it is important to note that where meetings of this nature are proposed and/or take place:

- Best practice is that the meeting should commence with a declaration by all parties (i.e. Sunsuper and external parties attending the meeting) of any conflicts of interest and duties (this provision is not however a formal policy requirement).
- If any conflict is identified in the course of those discussions, the parties should consider whether, in light of the nature and materiality of the potential conflict which has been disclosed, the person to whom the conflict relates should excuse themselves for part or all of the meeting and/or whether the meeting should proceed or continue;
- Any conflict that comes to the attention of Sunsuper Representatives should be brought to the attention of their Manager, and in the case of a Material Conflict the Company Secretary, in accordance with section 8; and
- All discussions in relation to a potential conflict and the course of action taken should be documented in accordance with section 8.

9. **Specific Requirements for Directors of any Sunsuper Group Entity, Responsible Persons and Responsible Managers Only**

Directors and other Responsible Persons are required to disclose any conflict arising in respect of any matter before it is considered in any meeting agenda. In this case, the responsibility for managing a conflict of interest or duty is shared between the person who has declared the conflict and all other board or committee members (or in the case of Responsible Persons, other Responsible Persons).

Section 32 of Prudential Practice Guide 521 - Conflicts of Interest states:

'APRA expects that a director of an RSE licensee with a relevant interest or duty that conflicts the duty to or interests of beneficiaries, and relates to a matter that is being considered as a directors' meeting, would not ordinarily be present while the matter is being considered at the meeting or otherwise vote on the matter.'

9.1 Conflicts Disclosed by a Director or Responsible Person

The following process provides guidance in the event a Director or a Responsible Person identifies a conflict of interest or duty and declares in a Board or Committee meeting:

- Stage 1: Director or Responsible Person identifies that they have a conflict of interest or duty;
- Stage 2: The conflicted person notifies the Company Secretary and the Board or Committee of their conflict;
- Stage 3: The remaining Board or Committee members determine the appropriate remedial action where appropriate; and
- Stage 4: The remaining Board or Committee members inform the conflicted member of the outcome where appropriate.

9.2 Managing Conflicts Raised by a Responsible Officer/Director in Respect of Another Person

The following process provides guidance in the event that a Director or Responsible person identifies a conflict of interest or duty in respect of another Director or Responsible Person:

- Stage 1: A Director or Responsible Person identifies a potential conflict in respect of another person and notifies the Company Secretary and the Board or Committee. The affected person is provided an opportunity to respond with their view on the potential conflict;
- Stage 2: The remaining Board or Committee members determine nature of conflict (including whether a conflict in fact exists);
- Stage 3: If there is a deemed conflict, the remaining Board or Committee members determine the appropriate remedial action; and
- Stage 4: The remaining Board or Committee members inform the conflicted member of the outcome.

9.3 Additional Information when Disclosing and Managing Conflicts

Once a decision is made in respect of the conflict, the Company Secretary must ensure that it is recorded in the appropriate register or meeting minutes as soon as practical including any actions agreed to manage the conflict.

Notice will not be required where a standing notice of the nature and extent of the interest has been given and the notice remains effective. A standing notice ceases to have effect if the nature or extent of the interest materially increases above that disclosed in the notice.

Where appropriate, the Conflicts Investigations Committee can be convened to assess the seriousness of significant possible conflicts and determine (in consultation with Board, management or internal legal counsel if necessary), how the conflict should be managed, keeping adequate records of the conflict management process, and preparing reports to management and, as appropriate, the Board.

Conflicts must be managed in accordance with the requirements of sections 52(2) (d) and 52A (2) (d) of the SIS Act. Accordingly, the Trustee and Responsible Persons must each:

- Give priority to the duties to, and interests of Beneficiaries over the duties and interests of other persons;

- Meet their duties to Beneficiaries despite any conflict;
- Ensure Beneficiaries' interests are not adversely affected by any conflict; and
- Comply with the APRA Superannuation Prudential Standards in relation to conflicts.

9.4 Materiality for Disclosure in the Registers of Relevant Duties and Relevant Interests

For the purposes of disclosing a Relevant Duty or a Relevant Interest in the Register of Relevant Duties and the Register of Relevant Interests, the Trustee has assessed and determined materiality thresholds for a number of particular kinds of Relevant Duties and Relevant Interests.

The materiality thresholds for determining Relevant Duties and Relevant Interests are detailed at **Table 1 and 2 of Appendix 2**. For any other Relevant Duties and Relevant Interests that arise but have not been identified in Appendix 2, the Trustee through the Company Secretary will assess and determine materiality based on criteria suited to the nature of the duty or interest.

In determining materiality thresholds, the Trustee has considered characteristics that might reasonably have the potential to have a significant impact on the capacity of the Trustee, an Associate of the Trustee or the Responsible Person of the Trustee holding the Relevant Duty or Relevant Interest to act in a manner that is either consistent or inconsistent with the best interests of Beneficiaries.

9.5 Material Personal Interests - Directors of all Sunsuper Group Entities

Directors are the subject of a duty under the *Corporations Act 2001* to provide notice to the other directors of the company of any Material Personal Interest in a matter that relates to the affairs of the company, subject to a number of exceptions. The details of the Material Personal Interest must be recorded in the minutes of the meeting in which the director gave the notice.

The Company Secretary is responsible for ensuring the recording in the minutes of the Sunsuper Board (including Board committee and other Board-related meetings) details of each Material Personal Interest and conflict identified during the meeting and the action and/or decision taken to avoid or manage this conflict.

9.6 General Disclosure

In accordance with the Trustee's *Fit and Proper Policy*, all Responsible Persons (Directors and other Senior Managers) are required to sign as part of their appointment a *Fit and Proper and Other Matters Declaration* which discloses all relevant duties and relevant interests including any known actual, perceived and potential conflicts in duties and interests.

All Directors and Responsible Persons of the Trustee and all Responsible Managers of the Sunsuper Group AFS Licensees are also required to complete a *Fit and Proper and Other Matters Declaration* annually.

- All annual *Fit and Proper and Other Matters Declarations for **Responsible Persons*** are co-ordinated by the Company Secretary and reviewed by the Company Secretary and any declared conflicts of duties and interests are noted in Registers including those required for the 'relevant duties' and 'relevant interests' Registers; and
- All annual *Fit and Proper and Other Matters Declarations for **Responsible Managers*** are co-ordinated by the Head of Compliance or delegate and reviewed by the Head of Compliance or delegate and any declared conflicts of duties and interests are advised to the Company Secretary for noting in Registers.

Additionally, in the period between annual declarations, all Directors and Responsible Persons of the Trustee and all Responsible Managers of the Sunsuper Group AFS Licensees are required to notify the Company Secretary on a timely basis of any changes that occur with any duties and interests that may conflict.

9.7 Managing Nominating Shareholder Conflicts

Nominated Directors may take reasonable steps to ensure they are aware of their appointing shareholder's views on a particular matter and may put those views to the respective Board.

In the case of the Trustee, the position taken by such directors in debate and decision-making is to firstly reflect and give priority to the director's responsibilities and duties to, and the interests of, the Members, Beneficiaries and Sunsuper.

In the case of Sunsuper Financial Services Pty Ltd and Precision Administration Services Pty Ltd and any other wholly or partially owned entity, a director is taken to be acting in good faith in the best interests of the owned entity if the director acts in good faith in the best interests of its holding company (i.e. Sunsuper Pty Ltd as trustee of the Sunsuper Superannuation Fund).

10. **Key Related Policies Conflict Obligations - All Sunsuper Representatives**

This policy outlines a framework of policies, systems and processes with accountability for compliance spread across the Sunsuper Group. A high level summary of some of these policies is set out below and in Appendix 1 with details of accountability set out in section 11.

10.1 Whistleblower Policy

The Trustee has established a whistle-blower line for use by Sunsuper Representatives. The Trustee's requirements for the reporting of matters by Sunsuper Representatives is set out in the Whistle-blower Policy.

This Policy provides a confidential telephone hotline service that Sunsuper Representatives can use to anonymously report to an independent third party fraudulent, unethical, illegal or corrupt conduct, including any breaches of this Policy.

Calls to the Ethics Line are reported to the Conflicts Investigations Committee who will review and assess all disclosures and determine an initial response for dealing with the matter.

10.2 Outsourcing and Service Providers

Regular and thorough enquiries to identify all conflicts arising from relationships of the Trustee or Sunsuper Representatives with an existing or prospective service provider or adviser must be undertaken. This includes all enquiries that have the potential to affect the service provider's performance in respect of the obligations undertaken for the Group and its business operations.

Sunsuper Representatives should not:

- participate in a tendering/purchasing process (including decision making process); or
- be involved in the day to day administration or management of a service provider, if they have a conflict in relation to the matter.

Outsourcing and Procurement policies provide details for management of conflicts in a procurement or outsourcing circumstance.

10.3 Gifts, Entertainment and Gratuities and Conflicted Remuneration

The Sunsuper Group promotes a culture where Sunsuper Representatives act with integrity at all times, and do not accept inappropriately expensive or unsuitable gifts. Full details of Sunsuper's policy is set out in the *Gifts, Entertainment and Other Benefits Policy*.

The Company Secretary will be advised of gifts, entertainment or gratuities noted in relevant Register to determine if any gifts constitute a Relevant Interest which requires disclosure on the public website.

All Sunsuper Representatives are required annually to declare compliance with this Policy as part of their declaration of compliance with the Conflicts Management Framework.

10.4 Disclosing Conflicts of Interest to Members and Others Receiving Financial Advice

Through its AFS Licensee entities, the Sunsuper Group provides financial advice to Members and other persons and it also issues financial products. In providing those financial services, the Trustee will ensure that members are adequately informed about any material conflicts of interest that may affect the provision of those financial services.

Sunsuper will ensure that any disclosure about potential, perceived or actual conflicts of interest will be timely, prominent, specific and sufficiently meaningful to allow members to make an informed decision about how any conflict may affect the financial service being provided to them. In all cases disclosure will be provided to allow a reasonable time to assess its effect and refer to the specific service or issue to which the conflict relates.

Disclosure is required to be provided, as appropriate, in a Financial Services Guide (FSG), a Statement of Advice (SoA) and/or a Product Disclosure Statement (PDS) before a financial service is provided to retail clients, including Members. Sunsuper will also have regard to the disclosure requirements in its annual report.

The content of disclosures concerning the provision of financial product advice will vary depending on the circumstances. For example, the Trustee, in giving advice about its own product, will identify itself as both the Trustee and the product issuer. It may also consider it necessary to disclose Precision Administration Services Pty Ltd is wholly owned by the Sunsuper Superannuation Fund. Similarly, Sunsuper Financial Services Pty Ltd is to disclose that it is wholly owned by the Sunsuper Superannuation Fund.

More information on dealing with conflicts of interest in the provision of financial services is provided in the Sunsuper *Representatives' Manual*. Any further guidance and queries with respect to disclosures of conflicts of interest when providing financial services under the AFS Licensees are to be directed to the Head of Compliance.

10.5 Conflicted Remuneration and Sunsuper's MySuper Authorisation

In order to meet the requirements for an authority to offer a MySuper product, the Trustee has made an election in its application to APRA that it will not fund payment of conflicted remuneration to an Australian financial services licensee or representative from MySuper product fees charged to MySuper members. This includes benefits or payments that may be given indirectly through an intermediary to an Australian financial services licensee or representative. For more information please contact the Head of Compliance.

10.6 Personal Relationships in the Workplace Policy

The *Personal Relationships in the Workplace Policy* deals specifically with the standards of expected behaviour and puts in place a framework to assist to resolve, to the extent possible, conflicts that may arise in workplace duties, entitlements and responsibilities due to personal relationships between Sunsuper Representatives.

10.7 Connection with Fit and Proper Policy

The Trustee should consider the Fit and Proper Policy in determining whether an individual meets the propriety limb of the Fit and Proper Policy. Additionally the completion of declarations referenced in sections 9.6 and 11.3 of this Policy and the Fit and Proper Policy are part of this process.

11. MAP of Related Policies and Guidelines and Registers and Accountability

The following policies and guidelines are relevant to the conflicts management framework set out in this policy. See below for details of relevant policies, registers and other matters and accountable EGMs. **Appendix 1** also provides further information.

11.1 Policies

Policy	EGM/Business Owner. Accountability for;
	<ul style="list-style-type: none"> • Policy, Systems and Processes and Reporting for Compliance; and • Consultation with stakeholders.
Board Charter	Company Secretary.
Code of Conduct and Ethics	Company Secretary.
Corporate Governance Statement.	Company Secretary.
Fit and Proper Policy	Company Secretary.
Employee Out of Hours Conduct Guide	EGM People & Culture.
Equal Employment Opportunity Policy	EGM People & Culture.
External Appointment Policy (new policy 2019)	EGM People & Culture.
Issue Resolution Policy	EGM People & Culture.
Personal Relationships in Workplace Policy.	EGM People & Culture.
Secondary Employment Policy	EGM People & Culture.
Contract Authorisation Form (Non-investment)	Chief Financial Officer
Contract Authorisation Form (Investments)	EGM Risk, Legal & Compliance
Outsourcing and Procurement policies	Chief Financial Officer .
Non-Monetary Benefits Conflicted Remuneration Policy	EGM Risk, Legal & Compliance
Gifts, Entertainment and Other Benefits Policy.	EGM Risk, Legal & Compliance
Sunsuper Representatives Manual	EGM Risk, Legal & Compliance
Restricted Security Trading Policy	EGM Risk, Legal & Compliance.
Whistleblower Policy	EGM Risk, Legal & Compliance.

11.2 Registers

Set out in the table below are Sunsuper's key registers under the conflict management framework and accountability for the Registers.⁴

Registers	EGM/Business Owner
Register of Relevant Duties and Relevant Interests	Company Secretary.
Register of Conflicts of Duties and Interests that include: <ul style="list-style-type: none"> • Register of Material Personal Interests; and • Register of Related Party Interests. 	Company Secretary.
Register of non- material conflicts	Company Secretary
Register of Interests pursuant to Personal Relationships in the Workplace Policy	EGM People & Culture.
Register of External Appointments and Secondary Employment	EGM People & Culture.
Registers of Gifts	EGM Risk, Legal & Compliance
Register of Conflicted Remuneration	EGM Risk, Legal & Compliance

The Company Secretary will organise for a copy of the Register of Relevant Duties and Relevant Interests to be updated as soon as possible when a Responsible Person is appointed and they declare a Relevant Duty and/or Relevant Interest at the time of appointment. All other ongoing changes to this Register will be updated at least once a quarter in line with the timeframes set out in ASIC RG 252 which requires updates to be made within 20 business days of the end of each quarter.

⁴ Effective April 2019 a Register of Conflicts of Interest and Duties (to supplement Register of Relevant Interests and Duties) was implemented

All records of conflicts disclosed and managed in meeting minutes for the Board (including Board committee and other Board-related meetings) and in the above Registers are to be maintained for at least 7 years.

11.3 Declarations

No.	Declaration Type	For Whom	Responsibility
1	Preparation and Review of initial and annual declarations for Responsible Persons and Directors of Sunsuper Group.	Responsible Persons and all Directors of Sunsuper Group.	Company Secretary.
2	Preparation and review of annual declarations for Responsible Managers and advice to Company Secretary and other stakeholders of information to be included in appropriate Registers.	Responsible Managers.	EGM Risk, Legal & Compliance
3	Annual declaration for all Sunsuper Representatives in relation to compliance with policies including: <ul style="list-style-type: none"> • Conflict Management Policy; • Code of Conduct and Ethics; • Restricted Trading Policy; • Gifts, Entertainment & Other Benefits Policy; • External Appointment Policy. 	All Sunsuper Representatives.	EGM People & Culture.

12. Review

Ad-hoc assessment of the conflicts management framework will be in light of changes to matters such as: undertaken

- a) Sunsuper Group's business operations;
- b) The structure of Sunsuper Group;
- c) Sunsuper Group's service providers and any changes to or within service providers; and
- d) Responsible Persons and changes in their composition or circumstances which would impact on Sunsuper Group's business operations.

An annual review of this *Conflicts Management Policy* will be undertaken by the Company Secretary and a report provided to the Audit, Compliance and Risk Management Committee (AC&RMC) and the Board. This annual review covers ongoing monitoring processes and controls focussed on potential and actual conflicts, as well as broader compliance with the conflicts management framework across the entirety of the Sunsuper Group. Amendments to this policy must be approved by the Board.

Compliance with the *Conflicts Management Policy* will be reported annually by the Company Secretary to the Audit, Compliance and Risk Management Committee.

12.1 Comprehensive Review

On at least a three (3) year basis, the Company Secretary will arrange for a comprehensive review of the Group's conflicts management framework and this Policy by an operationally independent, appropriately trained and competent person and report the results of this review to the Audit, Compliance and Risk Management Committee (ACRMC) in regards to any changes to the framework and Policy, and report any findings in regards to compliance with the framework and Policy to the ACRMC, which will, report to the Board.

The scope of the comprehensive review of the conflicts management framework must have regard to:

- a) The size, business mix and complexity of the Sunsuper Group's business operations;
- b) The extent of any changes to those business operations; and
- c) Any changes to the external environment in which the Sunsuper Group operates.

At a minimum, the review of the conflicts management framework must consider:

- a) Whether all relevant duties and all relevant interests have been identified and are being addressed in accordance with the conflicts management framework and this Policy;
- b) The level of compliance with the Policy, including reporting in the registers of relevant duties and relevant interests; and
- c) Any non-compliance with the conflicts management framework and this Policy, including steps taken to return to, and improve, ongoing compliance.

12.2 Comprehensive Review Summary

Date	Reviewer
May 2017	KPMG
First half of 2020	KPMG

Appendix 1 - Conflicts Management Framework

Sunsuper's Key Systems, Structures, Policies and Processes for Managing Conflicts include Requirements in Table below.

1. All SunsUPER Representatives (Directors, Officers, Employees, Contractors and Consultants)

No.	Requirement	Policy	Accountable EGM for Framework, Policies, Systems.
1.	Directors, officers, members of the investments team and investment consultants are required to review and disclose, on a periodic basis, any direct or indirect interests in certain investments (e.g. major holdings, private equity, and property) that are held in common with the Fund.	Restricted Trading Policy.	EGM RLC.
2	Through the processes of the <i>Sunsuper Restricted Security Trading Policy</i> , all SunsUPER Representatives: <ul style="list-style-type: none"> Who are Identified Persons under the Policy are required to obtain written pre-trade approval that a publicly traded security is not on the Restricted List prior to transacting in that security and they are restricted from trading in those securities whilst on the Restricted List; or Who become aware of material price sensitive non-public information on a publicly traded security must inform the Head of Compliance as soon as possible so that the security can be included on the Restricted List and also must refrain from communicating this information to non-authorised persons and must not trade on the information while it is non-public. 	Restricted Trading Policy.	EGM RLC.
3	Segregating the individual investment selection process from the investment strategy and oversight process.		CIO
4	Segregating the front-office, middle-office and custodian functions and enforcing strict unit pricing practices.		Chief Financial Officer.
5	Maintaining a Gifts Register to record gifts, entertainment and gratuities received from external parties.	Gifts, Entertainment and Other Benefits Policy	EGM RLC.
6	Maintaining a Non-Monetary Benefit (s. 963C <i>Corporations Act 2001</i>) Register for SunsUPER AFS Licensees and representatives to record the receipt of qualifying education, training and information software or support benefits of any value and any non-monetary benefits valued from \$100 to \$299 that are subject to the conflicted remuneration requirements.	Non-Monetary Benefits Conflicted Remuneration Policy	EGM RLC.
7	Requiring all SunsUPER Representatives to annually review and formally acknowledge compliance with relevant policies.	CMP	EGM People & Culture.
8	Ethics Line is made available for all staff to report conflicts in a confidential way.	Whistleblower Policy.	EGM RLC.
9	All SunsUPER Representatives are required to authorise employment screening checks which includes disclosure of relevant company directorships and any relevant business interests both prior to recruitment and also on a periodic basis whilst continuing to work with the SunsUPER Group.	People and Culture Policies	EGM People & Culture.
10	All SunsUPER Group employees and contractors are required to restrict their employment and business activities and interests to SunsUPER business unless the People team is informed and provides consent subject to the term of the person's employment.	Secondary Employment Policy (implemented 2019)	EGM People & Culture.
11	All SunsUPER Representatives are required to notify and receive consent pursuant to the provisions of the External Appointment Policy before accepting an officeholder position with an external organisation subject to exceptions in Policy.	External Appointment Policy (implemented 2019)	EGM People & Culture.
12	All SunsUPER Representatives are required to comply with the- <i>Personal Relationships in the Workplace Policy</i> . (PRWP)	PRWP	EGM People & Culture.

2. Company Secretary
 - As part of appointment process, requiring all Responsible Persons to undergo a fit and proper assessment process which includes disclosure of any conflicts with a declaration and authorising employment screening checks of company directorships and other relevant checks;
 - On an annual basis, requiring all Directors and other Responsible Persons to complete a declaration which includes disclosure of any conflicts and every three years' authorising employment screening checks of company directorships and other relevant checks;
 - Requiring Directors and other Responsible Persons to disclose any actual, potential or perceived conflicts that exist or changes to business or personal relationships, including directorships and other associations that have occurred since the previous meeting of the directors;
 - Requiring Directors and other Responsible Persons to disclose interests in unlisted service providers and material holdings in listed service providers;
 - Requiring Directors and other Responsible Persons to disclose any conflicts with agenda items at each meeting of the directors and recording those conflict matters in the meeting minutes;
 - ACRMC & Board to oversee annual review of conflicts management framework and Policy and initiate the three (3) yearly independent comprehensive reviews of the framework and Policy.
 - Recording in the minutes of Board, Board Committee and meetings of Sunsuper Financial Services Pty Ltd and Precision Administration Services Pty Ltd details of each conflict identified and where relevant the action taken to avoid or manage this conflict; and
 - Co-ordinating the Conflicts Investigation Committee (except WhistleBlower matters are co-ordinated by Chief Risk Officer) where guidance on significant conflict issues is sought.
3. Responsibility for all Matters Relating to Authorised Representatives and Responsible Managers under Sunsuper's AFSs is under review.
4. Chief Financial Officer has Responsibility for Policies, Systems and Processes Relating to Service Providers (See Outsourcing and Procurement Policies for Relevant Details)
 - Requiring material and important major outsourced service providers to identify and disclose any actual, potential or perceived conflicts prior to their appointment and during the currency of any engagement as required;
 - Confirming prior to appointment, where required under the Outsourcing and Procurement policies, the existence of codes of conduct and conflicts management policies for material and important major service providers;
 - Subjecting material and important major service providers to a rigorous due diligence and tender process in accordance with the *Sunsuper Outsourcing Policy*; and
 - Monitoring and approving the financial auditor's non-audit activities.
5. People and Culture Team has Responsibility for Sunsuper Learning and Development
 - Conducting induction and ongoing training in accordance with the *Conflicts Management Policy* and framework; and
 - Responsibility for External Appointment Policy and Personal Relationships in Workplace Policy and relevant Registers.

Appendix 2 - Register of Relevant Duties and Relevant Interests

Sunsuper Pty Ltd as the RSE licensee for the Sunsuper Superannuation Fund is required under the APRA *Prudential Standard SPS 521 Conflicts of Interest* to maintain up-to-date Registers of Relevant Duties and Relevant Interests.

Relevant Duties and Relevant Interests are defined as shown in the definitions section of this Policy, in accordance with SPS 521.

To assist Sunsuper Group Responsible Persons in the identification of Relevant Duties and Relevant Interests, Sunsuper Group uses the following examples and materiality thresholds as a guide to assist in the identification of items requiring disclosures in those Registers.

Table 1 - Relevant Duties Where Potential, Perceived or Actual Conflict of Duties May Arise

Examples of Organisations Where "Duties to Other Persons" May Arise	Examples of Roles Where "Duties to Other Persons" May Arise
Sunsuper Group Companies.	<ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; and Executive.
Sunsuper Sponsoring Employer and Member Organisations.	<ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; and Executive.
Participating Employer of Sunsuper.	<ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; Executive; and • Shareholder (refer to materiality thresholds for security investments in Table 2 below).
Service Providers - Currently Supplying.	<ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; Executive; and • Shareholder (refer to materiality thresholds for security investments in Table 2 below).
Service Providers - Previous or Prospective Suppliers.	<ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; Executive; and • Shareholder (refer to materiality thresholds for security investments in Table 2 below).
Investment Management or Investment Consultancy Business.	<ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; Executive; and • Shareholder (refer to materiality thresholds for security investments in Table 2 below).
Finance, Investment, Insurance and Superannuation Industry Representative Associations or Organisations.	NATIONAL AND STATE LEVEL POSITIONS ONLY <ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; and Executive.
Registered Political Parties (under <i>Commonwealth Electoral Act 1918</i> or equivalent State legislation).	NATIONAL AND STATE LEVEL POSITIONS ONLY <ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; and Executive.
Companies and Other Entities Affiliated or Associated With A Registered Political Parties (under <i>Commonwealth Electoral Act 1918</i> or equivalent State Legislation).	<ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; Executive; and • Shareholder (refer to materiality thresholds for security investments in Table 2 below).
Union, Employer Associations and Other Organisations Registered With Fair Work Australia (under <i>Fair Work (Registered Organisations) Act 2009</i>) or equivalent State Industrial Relations Body.	NATIONAL AND STATE LEVEL POSITIONS ONLY <ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; and Executive.
Other Companies, Trusts, Business Partnerships, Associations that are Assessed to Involve 'Relevant Duties' Requiring Disclosure.	<ul style="list-style-type: none"> • Director; Company Secretary; • Office Holder; Executive; and • Shareholder (refer to materiality thresholds for security investments in Table 2 below).

Table 2 - Relevant Interests - Materiality Thresholds

No.	Examples of Relevant Interests that may need disclosure	Materiality threshold where disclosure in register required by the RSE licensee or by associates or Responsible Persons of the RSE licensee
1.	Gift, Entertainment or Gratuity.	For receipt of a one-off gift, entertainment event or gratuity, materiality threshold is: <ul style="list-style-type: none"> • \$300 or more in monetary value. For receipt of gifts, entertainment events or gratuities of a repetitive nature over a 12 month period, consideration should be given to frequency and total value of gifts from a single source.
2.	Listed security investments in service providers, including: <ul style="list-style-type: none"> • Bankers; • Custodian; • IT services; • Mail house services; • Insurers; • Investment managers; and • Investment consultants. 	If either: <ul style="list-style-type: none"> • The gross payments for services made by the Sunsuper Group to the listed entity are or likely to be 1% or more of the listed entity's total annual operating income; OR <ul style="list-style-type: none"> • 1% or more of the total shares or other class of security on issue are owned either directly or indirectly by you Then disclosure of holdings required.
3.	Unlisted security investments in service providers, including: <ul style="list-style-type: none"> • IT services; • Marketing services; • Financial services; • Investment managers; and • Investment consultants. 	No materiality threshold applies for unlisted security investments in service providers that are held and disclosure of holdings required.
4	Listed security investments held directly by: <ul style="list-style-type: none"> • The Sunsuper Superannuation Fund; and/or • The Sunsuper Pooled Superannuation Trust; where 5% or more of the entity's total equity or other class of security are held.	No materiality threshold applies for investments in listed securities where 5% or more of total issued securities are held directly by the Sunsuper Superannuation Fund or Sunsuper Pooled Superannuation Trust and disclosure of holdings required.
5	Unlisted security investments held by: <ul style="list-style-type: none"> • The Sunsuper Superannuation Fund; and/or • The Sunsuper Pooled Superannuation Trust. 	No materiality threshold applies for unlisted security investments held by the Sunsuper Superannuation Fund or the Sunsuper Pooled Superannuation Trust and disclosure of holdings required.
6	Investments that were purchased from or sold to: <ul style="list-style-type: none"> • The Sunsuper Superannuation Fund; and/or • The Sunsuper Pooled Superannuation Trust. 	No materiality threshold applies for investments that were purchased from or sold to the Sunsuper Superannuation Fund or the Sunsuper Pooled Superannuation Trust.
	Transactions, investments and other interests involving the Trustee, associates of the Trustee or Responsible Persons of the Trustee.	No materiality threshold applies to transactions, investments and other interests involving the RSE licensee, associates of the RSE licensee or Responsible Persons of the RSE licensee - except for those relating solely to the Sunsuper Superannuation Fund's or Sunsuper Pooled Superannuation Trust's investment operations.
	Membership of the Sunsuper Superannuation Fund.	No materiality threshold applies and membership to be disclosed.
	Remuneration for Responsible Persons of the Trustee.	No materiality threshold applies and remuneration from previous financial year to be disclosed.

Disclosure of holdings in publicly available managed funds and ETFs offered by investment managers is not required.

Appendix 3 - Examples of Potential Conflicts that May Arise in Relation to a Sunsuper Representative and the Actions you may be Required to Take.

	Scenario	Your Responsibilities and interests	Further information	What should you do?
1	You have been offered a position on the Board of another super fund (excluding SMSFs).	As a Board member you will have responsibilities to the other fund which will conflict with your responsibilities to Sunsuper and its members.	The other fund will require you to be part of decisions about their strategy and operations which you could not fairly participate in without your knowledge of, and responsibilities to, Sunsuper influencing your decisions.	You should not accept the position on the other fund Board. See External Appointment Policy for full details of disclosure and approval required.
2	You have been offered a position on the Board of one of Sunsuper's Corporate Employers.	As a Board member you may have responsibilities to the Employer which go against your responsibilities to Sunsuper.	The Employer will need to make decisions about where their default super arrangements as well as payroll/clearing house decisions. Your knowledge of and responsibilities to Sunsuper would be conflicted if you provided advice or participated in these decisions.	See External Appointment Policy for full details of disclosure and approval required. Note that a director may cease to qualify as an 'independent director' under the SIS Act as a result of such an appointment.
3	You have been offered a position on the Board of another organisation.	Your private interests may interfere with your responsibilities to Sunsuper.	The organisation has no association with Sunsuper and your role is to help make decisions about the day to day operation.	See External Appointment Policy for full details of disclosure and approval required.
4	Your spouse or an immediate family member works for a vendor tendering to provide services to Sunsuper.	Your private interests may interfere with your responsibilities to Sunsuper.	If Sunsuper selects the vendor your spouse or immediate family member works for, you may benefit privately, particularly from your spouse receiving fees/income. Even if you are not directly involved in making the decision you could put pressure on other Sunsuper staff as to which vendor to select.	You should declare to your manager and the project/commercial team/person running the tender the potential conflict. You should not be involved in the tender process or making any decisions about which vendor to use. You should disclose the potential conflict to the Company Secretary See details in this Policy and Outsourcing Policy.
5	Your spouse or immediate family member is making a TPD claim with Sunsuper.	Your private interests may interfere with your responsibilities to Sunsuper.	If the claim is paid you would benefit privately from your spouse or immediate family member receiving the payment. Even if you are not in the Claims or Insurance teams you could put pressure on other staff to make a decision in your spouse or immediate family member's favour without considering all the facts.	You should let the claims team know that your spouse is making a claim. You should let your team leader or manager know and ensure that you do not discuss with other staff, and are not involved in performing, any tasks or jobs involving your spouse or immediate family member's account or claim. You should disclose the potential conflict to the Company Secretary.

The acceptance of gifts can also has the potential to create a conflict.