



Member Outcomes Assessment

Year ended 30 June 2024

Plum Super National Australia Bank Group Superannuation Fund A (Plan)

Plum Corporate Plan

Plum Personal Plan

Plum Retirement Income

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This document has been prepared on behalf of NULIS Nominees (Australia) Limited, ABN 80 008 515 633, AFSL 236465 (NULIS) as the Trustee of MLC Super Fund, ABN 70 732 426 024. NULIS is part of the group of companies comprising Insignia Financial Ltd, ABN 49 100 103 722 and its related bodies corporate (Insignia Financial Group).

The information in this document is general in nature and does not consider

your objectives, financial situation or individual needs. Before acting on any of this information, you should consider whether it is appropriate for you. It is important that you read the relevant Product Disclosure Statement and other disclosure documents or consider obtaining financial advice before making any decisions based on this information.

References to 'we', 'us' or 'our' are references to the Trustee, unless otherwise stated.

Subject to super law, the final authority on any issue relating to your account is the Fund's Trust Deed, and the relevant insurance policy, which governs your rights and obligations as a member.

Past performance is not a reliable indicator of future performance. Awards and ratings are only factors to consider when deciding to invest your super.

At a glance

30 June 2024

Plum Super National Australian Bank Group Superannuation Fund A (Plan) (NAB Staff MySuper)

Plum Corporate Plan

Plum Personal Plan

Plum Retirement Income



\$19.3b

Funds under administration



80k

Member accounts



\$241.3k

Members' average balance



**1 MySuper
4 Ready-made
portfolios**

Number of investment options



**11 options
Build your own
portfolio**

Number of investment options



74.5k

Members insured



Industry Ratings and Awards

Chant West	SuperRatings	Heron Partnership	Rainmaker Information
5 Apples	Platinum	5 Stars	AAA

Financial wellbeing for every Australian

NULIS Nominees (Australia) Limited (**NULIS**) is the Trustee of **MLC Super Fund** (the **Fund**), one of Australia's 10 largest superannuation funds. As part of the Insignia Financial Limited group, we aspire to create financial wellbeing for every Australian.

We seek to provide high quality products and service offering throughout the members' lifecycle (from their first job until retirement) and deliver on our investment objectives and growth strategies for the members.

Over the year, we continued to improve and simplify our investment menu, offering our members a more contemporary and diverse choice of investments.

As a product designed for employees, Plum Super has been consistently recognised by the industry with ratings of Five Stars by Heron Partnership as an Outstanding (Large) Corporate Fund, AAA by Rainmaker Information, Platinum by SuperRatings and 5 Apples by Chant West.

We believe the financial wellbeing of our members increase as their financial literacy improves thereby enabling them to make more informed decisions throughout accumulation and in retirement. We increased our workplace engagement this year with events such as the Financial Wellness

Series that were offered onsite and accessible through the members' portal. Member communications and newsletters have been scaled up to enhance the lifecycle programs with increased focus on topics for pre-retirees and retirees.

Our members have responded well to the strong investment returns of their super and, together with our improved member servicing this year, the survey scores we received from members have increased significantly from last year.

About this document

Each year NULIS is required to assess whether we have promoted the best financial interests of members. The Member Outcomes Assessment (**MOA**) is a measure of our products' performance against key factors prescribed by legislation which include:

- Investment strategy and performance,
- Investment risk,
- Fees & costs and the supporting fee structure,
- Insurance offer,
- Options, benefits and facilities,
- Scale, and
- Operating costs

All information contained in this document and the determinations made cover the 12 months ending 30 June 2024.

Our outcomes assessment uses publications from the Australian Prudential Regulation Authority (**APRA**), industry benchmarking, comparative data, in-house data and reviews conducted by independent research houses.

As we measure our success by what we delivered for our members, we further consider the results of the MOA in our annual Business Performance Review and factor key recommendations to improve members' outcomes into our Business Plans.

Overall determination

We have determined that NAB Staff MySuper, Plum Corporate Plan, Plum Personal Plan and Plum Retirement Income are promoting members' financial interests.

Plum Corporate Plan is a super offering to employers that can be tailored based on their employees' needs. Plum Personal Plan is available to the spouses of members in Plum Corporate Plan. It is also the retained plan offer when the members leave their employer. NAB Staff MySuper is the employer super plan offer for NAB employees, NAB ex-employees and their spouses.

NAB Staff MySuper delivered strong investment returns performing above peer median for the 1, 3, 5 and 10 years horizons when compared to all other MySuper options in the market.

The majority of the investment options assessed for Plum Corporate Plan, Plum Personal Plan and Plum Retirement Income performed above the peer median for rolling 1, 3, 5, and 10 year periods and met their stated investment objectives.

The investment options that are offered across all four products that were assessed by APRA have passed the annual investment performance test and heatmap results¹.

While our fees and costs were not as competitive as some of our peers, they aligned with the strong investment returns and a competitive members'

facilities and services offering in the marketplace.

Default insurance is available to all members and can be customised to meet their individual circumstances. The terms and conditions of the insurance offer are aligned to, or of greater benefit to, the members when compared to similar products in the market. Our insurance premiums are appropriately priced and do not erode the members' retirement benefits.

Given our size as one of the largest superannuation funds in the country, we have sufficient scale and are in a position to support long term outcomes for our members.



¹APRA Comprehensive Product Performance Package (CPPP), June 2024 (published Sep 2024).

Investment performance

We have determined that the investment strategy, and net investment returns of NAB Staff MySuper, Plum Corporate Plan and Plum Personal Plan are promoting the financial interests of members.

Our investment strategy for the Fund is annually reviewed and approved by the Trustee’s Board ensuring it continues to provide a diversified choice of investment menu options which deliver adequate returns over the long term without exposing members’ investment to inappropriate risk.

MLC MySuper adopts a lifecycle investment strategy. As members get closer to retirement age, we gradually replace a portion of their higher growth investments such as shares and property with more defensive options such as bonds and cash.

The MLC MySuper options met their investment objectives over the 1 and 10 year horizons but lagged over 5 years due to inflation in 2022 and 2023 and a sharp rise in interest rates.

NAB Staff MySuper has a default investment option that met its

performance objective of beating the CPI + 3.0% and performed above the peer median (2nd quartile ranking) over 1, 3, 5 and 10 years when benchmarked against all other MySuper products.

Based on APRA’s MySuper Quarterly Statistics (June 2024), the risk level of the NAB Staff MySuper option was assessed against the risk level of all other MySuper products and its 5-year net investment returns. We conclude that it has the appropriate level of risk consistent with its returns.

Plum Corporate Plan and its related personal plan, Plum Personal Plan, allow employers to customise the investment and insurance components of their workplace super according to the needs of their employees. Given the broad menu of investment options available for Plum products, we focussed on assessing the larger

investment options which in aggregate represent 80% of members’ funds under management. The majority of the “in-scope” investment options we assessed in this report achieved their investment objectives.

We calculated net investment returns as returns less administration fees, investment fees and costs, and taxes.

The majority of the lifecycle options in MLC MySuper showed above median peer results over 1, 3 and 5 years. The investment options for Age 63, 64, and 65 and Over fell slightly below the median across all investment periods however they comprised only 2% of our member accounts in MySuper.

Eighty percent of the options for Plum Corporate Plan and Plum Personal Plan delivered strong returns when compared to peers over the 1, 3, 5 and 10-year investment periods.

Plum Corporate Plan and Plum Personal Plan²

Investment Horizon	One Year				Three Years				Five Years				Ten Years			
	Quartile Rank				Quartile Rank				Quartile Rank				Quartile Rank			
Asset Class	1st	2nd	3rd	4th	1st	2nd	3rd	4th	1st	2nd	3rd	4th	1st	2nd	3rd	4th
% of Options	39%	30%	17%	13%	20%	30%	45%	5%	15%	45%	40%	0%	17%	28%	39%	17%

NAB Staff MySuper

Investment Horizon	One Year	Three Years	Five Years	Ten Years	Outcome
	Quartile Rank	Quartile Rank	Quartile Rank	Quartile Rank	
MySuper Option					
NAB Staff MySuper	Q2	Q2	Q2	Q2	Met

* Despite underperforming against the default universe, when compared to other investment options with similar growth allocations, the MySuper Age 65 and over achieves a met outcome.

²SuperRatings Fund Credit Rating Survey (FCRS), June 2024, supplemented by additional data from Morningstar where required.

Investment performance

MLC MySuper

Investment Horizon	One Year Quartile Rank	Three Year Quartile Rank	Five Year Quartile Rank	Outcome
MySuper Option				
MySuper Under 55	Q2	Q2	Q2	Met
MySuper Age 55	Q2	Q2	Q2	Met
MySuper Age 56	Q2	Q2	Q2	Met
MySuper Age 57	Q2	Q2	Q2	Met
MySuper Age 58	Q2	Q2	Q2	Met
MySuper Age 59	Q2	Q2	Q2	Met
MySuper Age 60	Q2	Q2	Q2	Met
MySuper Age 61	Q2	Q2	Q3	Met
MySuper Age 62	Q2	Q2	Q3	Met
MySuper Age 63	Q3	Q3	Q3	Not Met
MySuper Age 64	Q3	Q3	Q3	Not Met
MySuper Age 65 and over	Q3	Q3	Q3	Met*

* Despite underperforming against the default universe, when compared to other investment options with similar growth allocations, the MySuper Age 65 and over achieves a met outcome.

The in-scope investment options for Plum Corporate Plan and Plum Personal Plan were assessed based on their 5-year Sharpe Ratios and benchmarked against the SuperRatings Accumulation Volatility and Risk Adjusted Return Survey (June 2024) or the Morningstar Sharpe Ratio Report (June 2024) if required. Sharpe ratios are used to understand the return of an investment in relation to its risk, or in other words, an investment option's risk-adjusted return. Overall, the investment options were found to have the appropriate returns compared to their risk profile.

We calculate the level of risk of the investment options for MLC MySuper differently from those of MLC MasterKey Business and Personal Super given the different characteristics of the options themselves and the peer groups they are benchmarked against.

For MLC MySuper, based on APRA's MySuper Quarterly Statistics (June 2024), the risk level of each MLC MySuper investment option was assessed against the risk level of all other MySuper products and their 5-year net investment returns. All the MySuper investment options were determined to have the appropriate level of risk consistent with the returns.

We have assessed Plum Retirement Income's investment strategy, investment risk and net investment returns and determined that it is promoting members' financial interests.

The majority of options in-scope for Plum Retirement Income met their stated investment objective and all options showed above median investment returns except for the MLC Cash Pension that fell below the peer median when compared to the market. When analysed based on their risk profile, all options were determined to have the appropriate returns.

Fees and costs

We have determined that overall, the fees and costs for NAB Staff MySuper are promoting members' financial interests. However, we have determined that the fees and costs of MLC MySuper are not promoting the financial interests of members.

While the fees and costs for MLC MySuper were not as competitive as our peers in the market, MLC MySuper is part of the Plum Corporate Plan workplace product offering where members who work for a large employer may benefit from a discount on fees, to reflect the scale and consequent efficiencies that a large employer may bring.

We have evaluated the fees and costs of the NAB Staff MySuper and overlaid the results against the members' account balance thresholds - \$10K, \$25K, \$50K, \$100K and \$250K.

NAB Staff MySuper has favourable administration fees when compared to peers. However when benchmarked against market data, its total fees and costs are above the peer median which is a reflection of higher investment related costs due to the product's active investment management strategy.

The fees and costs for Plum Corporate Plan and Plum Personal Plan are promoting members' financial interests. However, we have determined that the fees and costs of Plum Retirement Income are not promoting the financial interests of the members.

The in-scope investment options for Plum Corporate Plan and Plum Personal Plan have been assessed against our peers in the market and the fee and cost outcomes show

that both products are competitively priced. On the other hand, the majority of the options in-scope for Plum Retirement Income were found to be priced above the peer median with the higher fees driven by investment fees and not administration costs.

A key initiative was completed in the second half of 2024 on the re-pricing of investment options under the Plum product suite (including NAB Staff Super). This undertaking is expected to reduce the fees and costs paid by our members.

We have also examined our basis for setting fees and have determined that they are appropriate. The fees charged to members cover the costs of the Fund to ensure long term sustainability.



Options, benefits and facilities

The options, benefits and facilities we offer to our members are promoting their interests.

We offer a range of member services and facilities that are competitive in the marketplace and have been ranked highly by independent research groups. We continue to improve on our digital services offering with uplifts to our super and insurance needs calculators, and digital hub for webinars. Our newsletters have been uplifted and aligned to our segmentation model with contents tailored to our members in

accumulation, pre-retirement and retirement.

We scaled up our Welcome and Nurture Member Journey program with several campaigns held during the year combining welcome calls and emails to drive a deeper member engagement. Two other email programs were delivered every quarter to the members in FY2024. The Engagement Email Program connects with the members

to initiate call- to- action messages and bring them the newsletters. The Performance Update Email Program regularly apprises the members on how their super products are performing plus other financial insights for their consideration. Our engagement metrics for the year showed that the programs are successful and above the industry benchmarks³.

	Average Open Rate	Average Click Through Rate
Engagement Email	44%	3.38%
Performance Update	53%	4.96%

Our financial coaches have been busy throughout the year providing general advice to the Plum members and the quality and level of services have been recognised with their overall net promoter score increasing by 10pts to +68.6 when compared to last year.

³ Banking and Finance Benchmarks on member engagement through email channels: Open Rate – 31.34%, Click Through Rate – 2.78% (MailChimp Marketing Resources, Dec 2023)

Insurance

We evaluated the insurance strategy, premiums and members' experience with their insurance transactions and conclude that insurance solutions for NAB Staff MySuper and Plum Corporate Plan are promoting members' financial interests.

By the end of the financial year, the insured membership in Plum Corporate Plan totaled 74,463 accounts which included ~21,230 NAB and NAB retained insured members.

Employers can choose a default insurance design that provides appropriate cover for the specific profile of their employees, and we offer a range of design options for them to tailor the insurance arrangements. About 94% of the group plans are highly customized and do not use individual member level occupation ratings as part of the insurance design. Five of the major insurance providers in Australia cover the group insurance requirements for Plum Corporate Plan members.

The insurance offerings for Plum Corporate Plan are competitive

in the market with the terms and conditions aligned to or better than the products offered by our peers. We have assessed our insurance premiums to be appropriate and do not inappropriately erode into members' retirement benefits. The average claim assessment duration is aligned to the market average.

The claim acceptance rates for members in Plum Corporate Plan are within expectations. However, a recent change in insurance provider for NAB Staff super has resulted to higher decline rates for Income Protection claims due to the low volume of claims received under the new insurer. Decline rates are expected to normalise over the medium to long term as the volume of claims increase.

The insurance strategy and fees and members' experience with their insurance transactions for Plum Personal Plan are determined to be promoting members' financial interests.

As of 30 June 2024, 47% or 31,928 members in Plum Personal Plan have

an insurance policy. There is only one service provider for the members' insurance requirements.

We find the insurance product for Plum Personal Plan to be competitive with the terms and conditions and premium rates aligned to if not better than other products offered in the market. We have however assessed the claims acceptance rates to be slightly outside our tolerance thresholds. While the average claim handling time for Death and Total Permanent Disability claims are below the comparable market segment, the Income Protection claims are longer than the industry average⁴. We will continue to monitor closely the insurance provider's metrics on the members' claim transactions.

⁴ APRA Life Insurance Claims and Disputes statistics, December 2023 (April 2024).

Scale and operating costs

The factors Scale and Operating Costs have been assessed at the Trustee level.

We have assessed that our operating costs are not promoting members' financial interests.

Our operating expenses for the year have been impacted by our transformation programs leading to increased average cost per member. Once these programs are completed, our products and service provider arrangements will be rationalised and

simplified and are expected to reduce our operating costs over the medium term.

As the Trustee for the Fund, we have determined that our scale is promoting members' financial interests.

We demonstrate scale benefits to promote better outcomes for our members. We are able to optimise

our bargaining power with service providers to provide more benefits to members and pool risk. Our financial sustainability metrics are within APRA's thresholds demonstrating our position to sustain member outcomes into the future.



We're here to help

If you have any questions or would like further information about your account, please contact us or your financial adviser.

Telephone	1300 55 7586
Email	service@plum.com.au
Website	plum.com.au