

Conflicts Management Policy Summary

Netwealth Superannuation Services Pty Limited

Approved and adopted by Netwealth Superannuation Services Pty Ltd (ABN 80 636 951 310) (AFSL 528032) (RSE Licence L0003483) on 29 June 2021

Netwealth Superannuation Services Pty Limited

ABN 80 636 951 310

Level 2/52 Collins Street
Melbourne VIC 3000

PO Box 336
South Melbourne VIC 3205

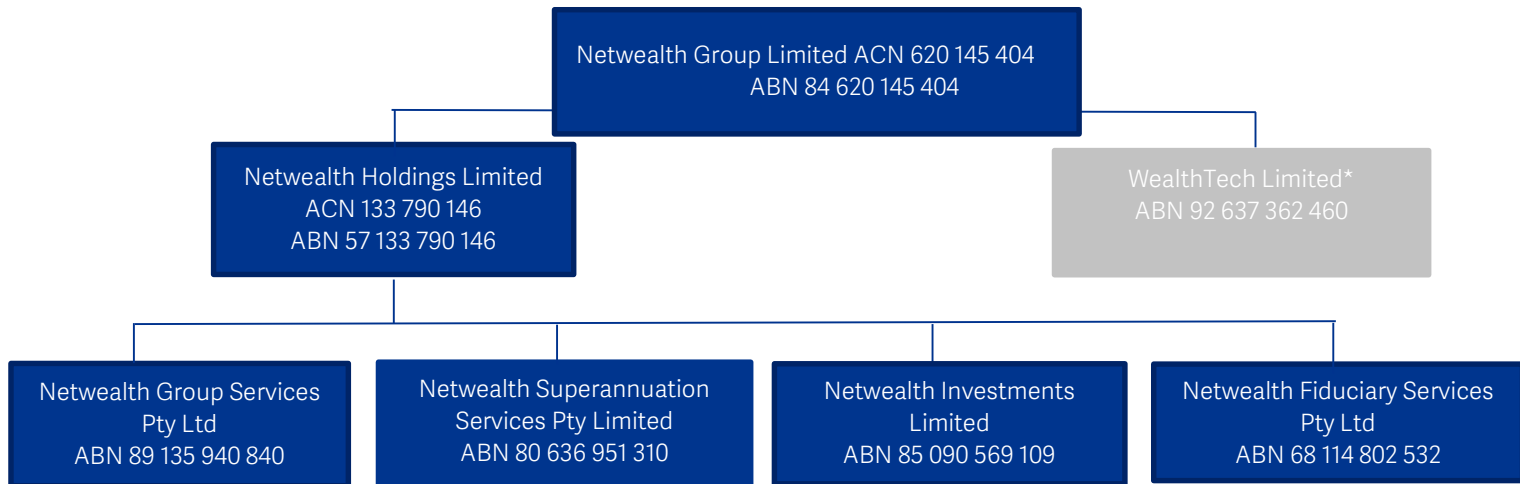
Document version control:

Document owner	Office of the Trustee
Frequency of review	Annually
Date of next scheduled internal review	March 2022 (unless required earlier)
Date of next independent review	May 2022
Regulator	ASIC, APRA
Regulatory Compliance requirements	Corporations Act 2001, Superannuation Industry (Supervision) Act 1993, APRA Prudential Standard SPS 521, ASIC RG 181 Licensing: Managing Conflicts of Interest, ASIC RG 246 Conflicted and other banned remuneration

1.0 About Netwealth

1.1 Netwealth entities

The Netwealth Group's current entity structure is shown below:



*WealthTech Pty Ltd is not operational as at July 2021.

Netwealth Superannuation Services Pty Ltd (**NSS**) is the Trustee of the Netwealth Superannuation Master Fund (**NSMF**). Netwealth Investments Limited provides platform provider, administrator and custody services to NSS and members of the NSMF under a material outsourcing arrangement. Netwealth Group Services Pty Ltd provides employee services to NSS under a secondment agreement.

2.0 NSS's conflicts management framework

NSS has established a Conflicts Management Policy and Framework to put in place controls and processes to identify, assess, monitor and manage (including to avoid if appropriate) any actual or potential conflicts between relevant duties and relevant interests of NSS and member of the NSMF.

2.1 Guiding principles for conflicts management

The Conflicts Management Policy is a key component of NSS's Conflicts Management Policy and Framework. The conflicts management policy covers:

- Roles and responsibilities of Directors and employees to identify and disclose conflicts, for the management and monitoring of conflicts, for the development of the policy, and for oversight of compliance with the policy;
- How relevant duties and relevant interests are defined;
- How conflicts or potential conflicts identified are to be assessed;
- Examples of the types of conflicts that may arise for NSS, and requirements for the management of different types of conflicts;

- NSS's policy on the giving and receiving of gifts and entertainment and other non-monetary benefits;
- Maintenance of a Conflicts of Interest Register, Gifts and Entertainment Register and Conflicted Remuneration Register; and
- Maintenance of the register of Relevant Interests and Duties for NSS (available [here](#))

Each Director and other Responsible Person must disclose all relevant duties and relevant interests prior to appointment, and is responsible for identifying, assessing and treating any conflicts of interest.

The Board regularly considers conflicts of interest and perceived conflicts of interest, particularly when dealing with third party or related party transactions or arrangements. These are managed in accordance with the Policy and Framework.

All employees are required to disclose actual or perceived conflicts of interest prior to commencement, and on an ongoing basis to bring to their manager's attention any suspected conflict of interest for their manager's consideration and referral to their Responsible Person and the Legal, Risk and Compliance Team.

NSS's Conflicts Management Policy and Framework is regularly reviewed, and compliance with the policy is monitored, in order to ensure that the conflicts management arrangements in place continue to operate effectively.