

# Conflicts Management Policy Summary

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## Netwealth Superannuation Services Pty Limited

Approved and adopted by:

Netwealth Superannuation Services Pty Ltd (ABN 80 636 951 310) (AFSL 528032) (RSE Licence L0003483) in the capacity of Trustee of the Netwealth Superannuation Master Fund on 27 April 2023

### Document classification: General use

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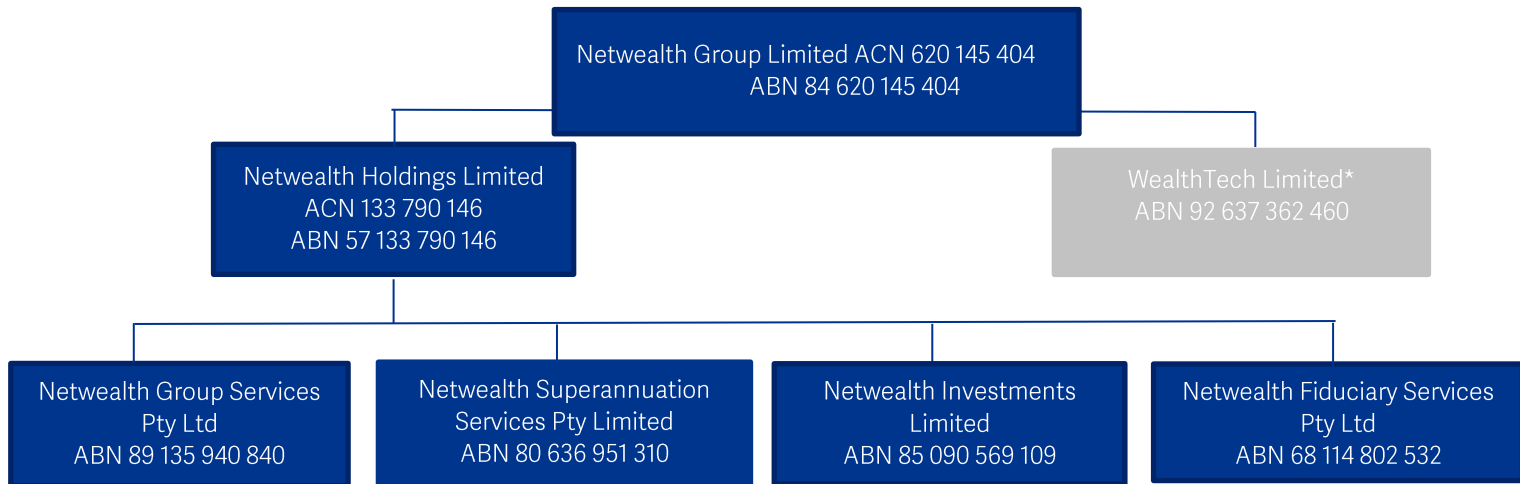
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## 1.0 About Netwealth

### 1.1 Netwealth entities

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



\*WealthTech Pty Ltd is not currently operational.

Netwealth Superannuation Services Pty Ltd (**NSS**) is the Trustee of the Netwealth Superannuation Master Fund (**NSMF**). Netwealth Investments Limited provides platform provider, administration 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 the relevant duties and relevant interests of NSS and members of the NSMF.

### 2.1 Guiding principles for conflicts management

The Conflicts Management Policy is a key component of the NSS Conflicts Management Framework. The Conflicts Management Policy covers:

- Roles and responsibilities of Directors, Responsible Persons 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;

- The NSS 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.

Each Director and other Responsible Person must disclose all relevant duties and relevant interests prior to appointment and on an ongoing basis, 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 an NSS Responsible Person and / or the Legal, Risk and Compliance Team.

The NSS 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.