

## Fiducian Portfolio Services Limited Summary of Conflicts Management Policy

Fiducian Portfolio Services Limited (the Trustee) has approved a Conflicts Management Policy which sets out procedures to identify and monitor potential and actual conflicts of interest that may arise in relation to the Fiducian Superannuation Service (the Fund). The Trustee's Policy takes into consideration relevant superannuation laws, industry and regulatory guidelines and APRA's Prudential Standards under SPS 521 – Conflicts of Interest.

The Policy forms a key component of the Trustees conflicts management framework which also includes the Trustee's Fit and Proper Policy, Insurance Management Framework, Outsourcing Policy, Risk Management Strategy and Risk Register.

The entirety of the framework provides an effective structure to ensure that conflicts of interest or duty (including potential and perceived conflicts) that may affect the Fund, its Directors, Responsible Persons and Employees are identified; and identified conflicts are managed in an appropriate, effective and consistent manner.

The Policy applies to all directors, employees and responsible persons of the Trustee, and outlines how the Trustee:

- Identifies and monitors potential and actual conflicts
- Avoids conflicts where required to do so
- Manages a conflict that has occurred, ensuring that the conflict is managed in accordance with the requirements of the Policy, with priority given to the duties and interests of beneficiaries
- Ensures that appropriate action is taken in the event of a conflict arising, including ongoing management and evaluation of the conflict
- Records details of conflicts that have arisen and the actions taken in the minutes of the relevant Board or committee meeting.

To assist in the identification and analysis of potential and actual conflicts, the Trustee maintains Registers of Relevant Duties and Relevant Interests, both of which are available on this website.

All Trustee Directors are required to disclose any actual, potential or perceived conflicts of interest on appointment to the Board, at the commencement of each Trustee Board and Committee meeting, and at least annually. The disclosures, and the way in which any conflicts are managed is in accordance with the Trustee's Conflict Management Policy.

The Trustee is required to review the Conflicts Management Policy on an annual basis.