



SUMMARY OF THE CONFLICTS OF INTERESTS & DUTIES POLICY MACQUARIE INVESTMENT MANAGEMENT LIMITED (“MIML”)

ABN: 66 002 867 003
AFSL No: 237492
RSEL No: L0001281

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1 POLICY STATEMENT

Macquarie Investment Management Limited (“MIML, we, us, our”) is a Registrable Superannuation Entity (“RSE”) Licensee authorised by the Australian Prudential Regulatory Authority (“APRA”) and an Australian Financial Services Licensee (“AFSL”), authorised by the Australian Securities and Investment Commission (“ASIC”) to provide financial services (including, operating various registered Managed Investment Schemes).

MIML is committed to conducting business in accordance with all applicable laws and regulations in the best interests of beneficiaries, clients, members and investors. Given the diverse range of financial products and services MIML offers, there will be situations where conflicts of interest, whether actual, perceived or potential may arise.

MIML has established a Conflicts of Interest & Duties Policy (“the Policy”) setting out the procedures and controls which help to identify and appropriately manage conflicts of interest as they arise during the course of doing business. This document is a summary of the Policy and the associated procedures for managing conflicts.

2 APPLICATION

The potential for conflicts of interest to arise is a key consideration for MIML, and our Policy applies to MIML, all Responsible Persons¹ and any other person whose conduct is likely to have a significant impact on sound and prudent management of the MIML business.

Consideration of whether a particular individual is a Responsible Person takes into account a person’s functions and duties and not simply their position or title.

3 CONFLICT OF INTEREST IDENTIFICATION

MIML has systems and protocols in place to identify actual, perceived or potential conflicts of interest. Once a conflict has been identified, procedures are implemented to manage it appropriately. Conflicts may potentially arise, for example, where:

- an advantage could be gained or a financial loss avoided at the expense of a beneficiary, client, customer, unit holder or counterparty;
- an interest exists in the service provided to a beneficiary, client, customer or unitholder, or in a transaction carried out on behalf of the aforementioned, that is contrary to their interests;
- a related party is engaged to provide a service to the trustee;
- an association exists with a service provider, investment vehicle or financial product and those service providers, investments in those vehicles or purchases/sales in which those financial products are engaged;
- an entity is the trustee, of multiple RSEs and it is considering a successor fund transfer from at least one of these RSEs to another;

¹ As defined in APRA Prudential Standard SPS 520, Fit and Proper.

- an individual has an ownership interest in an entity with which MIML may do business;
- an individual, who is a MIML Director, Responsible Person or a staff member performing services for MIML, may be personally affected by a MIML business decision; or,
- an individual, who is a MIML Director, Responsible Person or a staff member performing services for MIML, is a director or other officer of another entity, and that other entity:
 - is being considered as a possible provider of a service, financial product or investment vehicle to MIML;
 - provides a service(s) or financial product(s) to, or operates as an investment vehicle for MIML;
 - is being considered as the transferring fund or successor fund in a successor fund transfer; or
 - operates in the same market, potentially in competition.

4 OBLIGATION UNDER THE POLICY

All persons to whom the Policy applies must disclose to RMG Compliance or BFS Legal all actual, perceived or potential conflicts prior to an appointment to a Responsible Person position, and as they arise throughout the duration for which the position is held.

When managing conflicts, MIML may decide it is prudent for a person to relinquish the duty to another person, dispose of the interest or cease their role with MIML, either temporarily or permanently.

5 CONFLICT MANAGEMENT

There are three basic mechanisms to manage an identified conflict:

- a) controlling;
- b) avoiding; and
- c) disclosing and consent, where appropriate.

The appropriate mechanism to manage a conflict will depend on the circumstances and nature of any given conflict. Many conflicts of interest can be managed by a combination of internal controls and disclosures. However some conflicts may have such a serious impact on MIML's business activities, or on its capacity to act in the best interests of its beneficiaries, clients, members or investors, that the only way to adequately manage those conflicts will be to avoid them.

MIML has adopted a variety of measures to manage conflicts of interest including, but not limited to, policies, systems, whistleblowing, appropriate disclosure and escalation procedures.

6 REPORTING AND ESCALATION

Conflicts (including potential conflicts) which cannot be adequately managed by MIML's existing conflict management arrangements must be promptly reported and escalated to ensure that the duties to, and interest of beneficiaries, clients, members or investors receive priority over the duties to, and interest of, any other person.

7 DOCUMENTATION AND RECORD KEEPING

Conflicts identified in accordance with the Policy, including potential conflicts are recorded in the Register of Relevant Interests and Duties for the purposes of reporting to the MIML Board. Any breaches of MIML's conflicts management framework are recorded and reported in accordance with MIML's incident management process.

8 FURTHER INFORMATION

If you have any questions regarding the Policy or you need further information please Contact Macquarie Investment Management Limited. Click [here](#) for contact details.

9 DISCLAIMERS

This document is current as at September 2020 and is issued by Macquarie Investment Management Limited ABN 66 002 867 003 AFSL 237 492 RSEL L0001281 (MIML).

Investments in the Funds, other than cash deposits with Macquarie Bank Limited ABN 46 008 583 542 are not deposits with or other liabilities of Macquarie Bank Limited or of any Macquarie Group company, and are subject to investment risk, including possible delays in repayment and loss of income or principal invested. Neither Macquarie Bank Limited, MIML, Macquarie Life Limited ABN 56 003 963 773 AFSL 237497, nor any other member company of the Macquarie Group guarantees the performance of the Funds or the repayment of capital from the Funds or any particular rate of return of the investments purchased through the Funds.