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Via Electronic Transfer

16 February 2018

The Hon K M Hayne AC QC
 Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry

FSRCSolicitor@royalcommission.gov.au

Dear Commissioner

Intrust Super – Response to Royal Commission letter of 8 January 2018

I refer to your letter dated 8 January 2018 inviting Intrust Super to make an early written submission to the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry (**Commission**).

Intrust Super is pleased to assist the Commission.

IS Industry Fund Pty Ltd (ABN 45 010 814 623 AFSL 238051) (**Trustee**) is the trustee of the Intrust Super Fund (ABN 65 704 511 371) (**Intrust Super** or **the Fund**). The answers provided in this letter are provided on behalf of IS Industry Fund Pty Ltd and its associated entities IS Financial Planning Pty Ltd (ABN 64 143 430) which trades as **Intrust360°** and provides advice to our members and ISF Investment Pty Limited (ACN 123 042 142) the trustee of the ISF Investment Trust which holds some of our global limited partnership interests.

Intrust Super

Originally established in 1988 to service the hospitality industry, Intrust Super is now a public offer superannuation fund with approximately 120,000 members, 18,000 participating employers and \$2.4 billion of funds under management as at 31 December 2017.



Intrust Super is an industry fund built around putting the member first. We do not pay dividends to our shareholders nor commission to advisers.

Intrust Super, the Trustee and Intrust360° are members of the Association of Superannuation Funds of Australia Limited.

Various directors and staff are members of:

- Australian Institute of Company Directors;
- CPA Australia;
- Financial Planning Association of Australia;
- Governance Institute of Australia; and
- Bar Association of Queensland.

The Intrust Super Board of six (6) directors is made up of equal representatives nominated by the Queensland Hotels Association and United Voice Queensland State Branch.

To assist in the governance of Intrust Super, the Board has established the following Board Committees:

- Investment;
- Audit, Risk Management and Compliance;
- Remuneration;
- Administration, Contracts and Claims; and
- Marketing.

Our internal audit function is provided by KPMG and our auditor is BDO Audit (QLD) Pty Ltd (**BDO**).

Administration of the Fund has been outsourced to Link Administration Pty Limited and our custodian is JP Morgan Investor Services.

Investment is outsourced to various investment managers on the advice of our specialist investment adviser, JANA Investment Advisers Pty Ltd.

The Fund has three accumulation and one pension and transition to retirement products for members to choose from, Core Super, Executive Super, Select Super and Stream. Members can hold life insurance, total and permanent disability insurance and income protection insurance within their accumulation account. Our life and total and permanent disability insurer is Hannover Life Re Australasia Ltd and our income

protection insurance is provided by Chubb Insurance Australia Limited with claims management provided by Windsor Income Protection Pty Ltd.

Advice to our members is provided by IS Financial Planning Pty Ltd trading as Intrust360°. Intrust360° is a corporate authorised representative of Adviser Network Pty Ltd (ABN 25 056 310 609 AFSL 232729) a subsidiary of the Link Group. Advisers are remunerated by salary only and a bonus that is derived against the Fund's balanced scorecard.

Misconduct

1. Excluding cases of theft from the entity itself, or from an associated entity, has the entity identified any misconduct by the entity (including by its directors, officers or employees, or by anyone otherwise acting on its behalf) which occurred any time since 1 January 2008? If so, what is the nature, extent and effect of that misconduct?

"Misconduct" is defined in the Commission's Terms of Reference. Having regard to the definition we have assumed that the term does not include operational or administrative errors, unit pricing errors or processing delays unless there is also evidence of misleading, deceptive or unconscionable conduct.

For the purpose of answering question 1, the Trustee has reviewed all relevant records including, but not limited to, our Breach and Complaints Register, complaints that have been referred to the Superannuation Complaints Tribunal, complaints lodged with our third party Fund Administrator, electronic files, registers and communications with APRA, ASIC, the SCT and AUSTRAC and other regulatory bodies, matters referred to our insurers, internal and external auditor's reports, Board minutes, matters the subject of discussion in the press and human resource files of a serious nature as well as had discussions with BDO.

The Trustee has also taken steps to confirm that our external auditors have issued unqualified audit opinions during the period since 1 January 2008 and have not brought to the Trustee's attention any matters that required a reporting obligation to the Regulators.

Further to this BDO has confirmed that based on its audits of the Fund, it is not aware of any misconduct by the Trustee (including its directors, officers or employees, or by anyone otherwise acting on its behalf) which occurred at any time since 1 January 2008.

Based on the inquiries that we have made the Trustee has not identified any misconduct by the Trustee (including by its directors, officers or employees, or by anyone otherwise acting on its behalf) or by its associated entities, which occurred any time since 1 January 2008.

This being the case the Trustee has nothing to report in relation to the nature, extent and effect of any identified misconduct.

Community Standards and Expectations

2. Has the entity identified any conduct, practice, behavior or business activity it has engaged in (including by its directors, officers or employees, or by anyone otherwise acting on its behalf) since 1 January 2008, which it considers has fallen below community standards and expectations? If so, what is the nature, extent and effect of that conduct, practice, behaviour or activity?

The term “community standards and expectations” is not defined in the Terms of Reference or the Commission’s letter of 8 January 2018.

For the purpose of identifying any conduct, practice or behaviour by the Trustee or any of its directors, officers or employees, or by anyone otherwise acting on its behalf, that the Trustee considers has fallen below community standards and expectations since 1 January 2008, the Trustee has adopted the standards it sets for itself in its Corporate Governance Charter and measured its conduct against these standards.

The relevant standards intended to ensure high ethical standards, corporate behavior and accountability include as follows:

- Be a careful steward of member and corporate assets;
- Act honestly in financial reporting and communications;
- Avoid conflicts between personal and the Fund’s interests and, if conflicts do arise, they are to be notified immediately pursuant to established protocols;
- Obey the law and regulations;
- Foster a safe, healthy and productive workplace;
- Treat others with respect and caring.

These standards are further supported and embedded in the Board’s Code of Conduct and other Board Policies.

Particular conduct expected of our staff is set out in our Confidentiality and Privacy Policy, Sexual Harassment Policy, Discrimination Policy, Workplace Bullying Policy, Victimization Policy, and the Smoking, Alcohol and Drug Use Policy. In addition, the Workplace Health and Safety Policy, the Vehicles and Travel Policy and the Financial Processes Policy also outline expected conduct which, if breached, would lead to further action against the particular employee. These policies form part of the Employee Handbook. The Trustee’s standard Letters of Engagement and Employment Agreements also provide guidance for the standard of conduct expected by employees and the process for terminating an employee found guilty of misconduct.

For the purpose of answering question 2 and measuring our conduct against community standards and expectations, the Trustee has reviewed all relevant records including, but not limited to, our Breach and Complaints Register, complaints that have been referred to the Superannuation Complaints Tribunal, complaints lodged with our third party Fund Administrator, correspondence with APRA, ASIC and AUSTRAC and other regulatory bodies, matters referred to our insurers, internal and external auditor's reports, Board minutes, matters the subject of discussion in the press and all human resource management related complaints of a serious nature as well as had discussions with BDO.

The Trustee has identified six (6) instances that the Trustee has engaged in since 1 January 2008 which it considers may have fallen below community standards and expectations. None of these matters are currently the subject of another inquiry or investigation, or a criminal or civil proceeding but they each have been in the past and the relevant details are provided below.

1. Insurance Cover

The member received a unit of insurance cover on joining the Fund in 2008. The Fund then moved to account based insurance and the member no longer met the commencement of cover rules following a diagnosis of lymphoma. The member was told they held cover of a certain amount and this was confirmed more than once. On the member's death, the Group Life Insurer declined the death claim on the basis that the member had not met the commencement of cover rules on the transition to account based insurance. The deceased's spouse alleged that the Trustee had misrepresented to the member that the member had cover when the member did not. The matter was settled with a one-off payment to the deceased's spouse.

In answer to the Commission's questions requested in question 3 in relation to this conduct:

(a) Is the identified conduct, practice behavior or activity the subject of another inquiry or investigation, or a criminal or civil proceeding?

The conduct described was the subject of a complaint to the Superannuation Complaints Tribunal.

(b) Does the entity attribute any of the identified conduct, practice, behavior or activity to the particular culture or governance practices of the entity? If so, describe the culture or governance practice.

The Trustee does not attribute the conduct described to any particular cultural or governance practices of Intrust Super but rather to a failure by the Trustee to make it clear to the insured member that they were not insured for cover with the Fund nor would likely have been insurable with any other insurer subsequent to the diagnosis of their condition, a fact which was acknowledged by the SCT in upholding the Trustee's decision.

(c) Does the entity attribute any of the identified conduct, practice, behavior or activity to some broader cultural or governance issues in the industry or sector of the industry in which the entity operates? If so, describe those cultural or governance practices.

The Trustee does not attribute the conduct described to any broader cultural or governance issues in the industry or sector of the industry in which the Trustee operates.

(d) Does the entity consider that the identified conduct, practice, behavior or activity results from other practices (including risk management, recruitment or remuneration practices)? If so, describe those practices.

The Trustee does not consider that the identified conduct, practice, behavior or activity described results from other practices.

(e) What steps has the entity taken to:

(i) Remedy the consequences for consumers or other businesses of the identified conduct, practice, behavior or activity;

The Trustee made a one-off payment to the deceased member's spouse as a result of this identified conduct.

(ii) Prevent recurrence of conduct, practice, behavior or activity of the kind identified?

The Trustee has reviewed all disclosure practices, including scripting for call centre staff. A comprehensive review of statement disclosures as they relate to insurance was also undertaken.

2. Investment Switching not available

The members (2), each made a voluntary member contribution to the Fund on 30 June 2008 with a request for a future member investment switch. The contributions were accepted on this basis but at this time member investment switching was not available through the Fund's then administrator. The facility was introduced with effect from the first day of the following month. This meant however that the contributions received were allocated to the Balanced Investment Option rather than the Cash Option which the members had intended and the members suffered a loss due to market downturn.

In answer to the Commission's questions requested in question 3 in relation to this conduct:

(a) Is the identified conduct, practice behavior or activity the subject of another inquiry or investigation, or a criminal or civil proceeding?

The conduct described is, and was, not the subject of another inquiry or investigation, or a criminal or civil proceeding.

(b) Does the entity attribute any of the identified conduct, practice, behavior or activity to the particular culture or governance practices of the entity? If so, describe the culture or governance practice.

The Trustee does not attribute the conduct described to any particular cultural or governance practices of Intrust Super but rather to a misunderstanding by Trustee staff as to the real date of implementation of the investment switching facility.

(c) Does the entity attribute any of the identified conduct, practice, behavior or activity to some broader cultural or governance issues in the industry or sector of the industry in which the entity operates? If so, describe those cultural or governance practices.

The Trustee does not attribute the conduct described to any broader cultural or governance issues in the industry or sector of the industry in which the Trustee operates.

(d) Does the entity consider that the identified conduct, practice, behavior or activity results from other practices (including risk management, recruitment or remuneration practices)? If so, describe those practices.

The Trustee does not consider that the identified conduct, practice, behavior or activity described results from other practices.

(e) What steps has the entity taken to:

(i) Remedy the consequences for consumers or other businesses of the identified conduct, practice, behavior or activity;

The members were compensated from Fund reserves for their loss. The Trustee obtained the agreement of the then Fund Administrator to contribute 50% of the investment loss incurred by the members.

(ii) Prevent recurrence of conduct, practice, behavior or activity of the kind identified?

A switching facility in respect of future contributions was put in place by the Trustee.

3. Improving management of perceived conflicts of interest

Subsequent to the resignation of a director from the Trustee Board in October 2010, the Trustee became aware that the director had been engaged as a paid consultant with a company wholly owned by one of the directors of a service provider to the Fund engaged by the Trustee. On investigation of the matter, the Board concluded that while there was no evidence that the arrangement had in fact influenced the decision the director made in relation to the appointment of the service provider to the Fund, the director

had failed to properly disclose to the Board the arrangement and related remuneration since the arrangement commenced in December 2006.

In answer to the Commission's questions requested in question 3 in relation to this conduct:

(a) Is the identified conduct, practice behavior or activity the subject of another inquiry or investigation, or a criminal or civil proceeding?

The conduct described was subject to a comprehensive investigation by the Board and subsequent discussions with the Australian Prudential Regulation Authority. The relevant director was also subject to a Notice to Produce by the Royal Commission into Trade Union Governance and Corruption in 2014. The conduct has not otherwise been the subject of another inquiry, investigation or a criminal or civil proceeding. A copy of the material lodged with that Royal Commission can be provided on request.

(b) Does the entity attribute any of the identified conduct, practice, behavior or activity to the particular culture or governance practices of the entity? If so, describe the culture or governance practice.

The Trustee does not attribute the conduct described to any particular cultural or governance practices of Intrust Super.

(c) Does the entity attribute any of the identified conduct, practice, behavior or activity to some broader cultural or governance issues in the industry or sector of the industry in which the entity operates? If so, describe those cultural or governance practices.

The Trustee does not attribute the conduct described to any broader cultural or governance issues in the industry or sector of the industry in which the Trustee operates.

(d) Does the entity consider that the identified conduct, practice, behavior or activity results from other practices (including risk management, recruitment or remuneration practices)? If so, describe those practices.

The Trustee does not consider that the identified conduct, practice, behavior or activity described results from other practices.

(e) What steps has the entity taken to:

- (i) Remedy the consequences for consumers or other businesses of the identified conduct, practice, behavior or activity;**

There were no consequences for consumers or other businesses as a result of the identified conduct described which required remedy.

- (ii) Prevent recurrence of conduct, practice, behavior or activity of the kind identified?**

As a result of the identified conduct described there was a robust review of disclosure practices at Board meetings. Although there was a separate agenda item in respect of such disclosure at the relevant time, this process needed to be strengthened with the tabling of the Register of Interests and Duties in respect of all Responsible Persons at each Board and Committee meeting.

4. Privacy Breach

The Trustee was advised in February 2013 that members could log into their online member account and view other members' account details.

In answer to the Commission's questions requested in question 3 in relation to this conduct:

- (a) Is the identified conduct, practice behavior or activity the subject of another inquiry or investigation, or a criminal or civil proceeding?**

The breach of the privacy laws is not the subject of another inquiry or investigation, or a criminal or civil proceeding.

- (b) Does the entity attribute any of the identified conduct, practice, behavior or activity to the particular culture or governance practices of the entity? If so, describe the culture or governance practice.**

The Trustee does not attribute the conduct described to any particular cultural or governance practices of Intrust Super but rather to a processing error in 2008 which meant that for a group of members profiled in 2008 they were profiled with User IDs generated with a sequence number much greater than the "next

sequence” number that should have been used at the time. When the current sequence numbers reached the range of the existing (2008) User IDs the newly registered members were linked to both User profiles as they had been assigned the same sequence.

(c) Does the entity attribute any of the identified conduct, practice, behavior or activity to some broader cultural or governance issues in the industry or sector of the industry in which the entity operates? If so, describe those cultural or governance practices.

The Trustee does not attribute the conduct described to any broader cultural or governance issues in the industry or sector of the industry in which the Trustee operates.

(d) Does the entity consider that the identified conduct, practice, behavior or activity results from other practices (including risk management, recruitment or remuneration practices)? If so, describe those practices.

The Trustee does not consider that the identified conduct, practice, behavior or activity described results from other practices.

(e) What steps has the entity taken to:

(i) Remedy the consequences for consumers or other businesses of the identified conduct, practice, behavior or activity;

Member Access was taken offline until the matter was investigated and the root cause identified.

(ii) Prevent recurrence of conduct, practice, behavior or activity of the kind identified?

Once the root cause was identified, the problem was rectified.

5. Breach of the Advertiser Code of Ethics

On 23 September 2015 the Advertising Standards Board (ASB) found in case number 0356/15 that a television advertisement for the Fund's PayGuard salary continuance insurance product breached sections 2.1, 2.3 and 2.6 of the Advertiser Code of Ethics because the advertisement contained:

- a depiction that was vilifying of a person or section of the community on account of a disability;
- a depiction that portrayed violence that was not justifiable in the context of the product or service advertised; and
- a depiction that was contrary to prevailing community standards on health and safety related to bullying behavior.

In answer to the Commission's questions requested in question 3 in relation to this business activity:

(a) Is the identified conduct, practice behavior or activity the subject of another inquiry or investigation, or a criminal or civil proceeding?

The business activity described was the subject of a determination by the Advertising Standards Board.

(b) Does the entity attribute any of the identified conduct, practice, behavior or activity to the particular culture or governance practices of the entity? If so, describe the culture or governance practice.

The Trustee does not attribute the conduct described to any particular cultural or governance practices of Intrust Super but instead to differing interpretations between the Trustee, who approved the advertisement going to air based on advice from our legal advisers and advice from Commercial Advice Pty Ltd (CAD) and the Advertising Standards Board as to the purpose and meaning of certain terms in the Advertiser Code of Ethics.

- (c) Does the entity attribute any of the identified conduct, practice, behavior or activity to some broader cultural or governance issues in the industry or sector of the industry in which the entity operates? If so, describe those cultural or governance practices.**

The Trustee does not attribute the conduct described to any broader cultural or governance issues in the industry or sector of the industry in which the Trustee operates.

- (d) Does the entity consider that the identified conduct, practice, behavior or activity results from other practices (including risk management, recruitment or remuneration practices)? If so, describe those practices.**

The Trustee does not consider that the identified conduct, practice, behavior or activity described results from other practices.

- (e) What steps has the entity taken to:**

- (i) Remedy the consequences for consumers or other businesses of the identified conduct, practice, behavior or activity;**

There were no consequences for consumers or other businesses as a result of the identified conduct described which required remedy.

- (ii) Prevent recurrence of conduct, practice, behavior or activity of the kind identified?**

Intrust Super confirmed to the Advertising Standards Board that it regretted any offence, would make the appropriate rectification and agreed to refrain from screening the advertisement in free-to-air television in the offending form.

6. Failure to properly explain terms of new income protection arrangements

The member was denied continuation of top up income protection cover to a level of 90% of the member's pre-disability income. The evidence found by the SCT was that the Trustee's disclosure to the member of a change in income protection cover was inadequate and that Trustee staff were poorly informed about the impact of a change to new insurance cover which only allowed for cover in circumstances which subsequently applied to the member of 65% of the member's pre-disability income.

In answer to the Commission's questions requested in question 3 in relation to this business activity:

(a) Is the identified conduct, practice behavior or activity the subject of another inquiry or investigation, or a criminal or civil proceeding?

The Trustee's conduct was the subject of a complaint by the member to the Superannuation Complaints Tribunal. The Tribunal set aside the Trustee's decision and substituted its own decision.

(b) Does the entity attribute any of the identified conduct, practice, behavior or activity to the particular culture or governance practices of the entity? If so, describe the culture or governance practice.

The Trustee does not attribute the conduct described to any particular cultural or governance practices of Intrust Super but instead to an isolated judgment in relation to a particular term of the Income Protection policy.

(c) Does the entity attribute any of the identified conduct, practice, behavior or activity to some broader cultural or governance issues in the industry or sector of the industry in which the entity operates? If so, describe those cultural or governance practices.

The Trustee does not attribute the conduct described to any broader cultural or governance issues in the industry or sector of the industry in which the Trustee operates.

(d) Does the entity consider that the identified conduct, practice, behavior or activity results from other practices (including risk management, recruitment or remuneration practices)? If so, describe those practices.

The Trustee does not consider that the identified conduct, practice, behavior or activity described results from other practices.

(e) What steps has the entity taken to:

- (i) Remedy the consequences for consumers or other businesses of the identified conduct, practice, behavior or activity;**

The Trustee followed the order of the SCT and made a payment by way of lump sum to the member equivalent to the additional payments the member would have received under the original cover for the remainder of the benefit period.

- (ii) Prevent recurrence of conduct, practice, behavior or activity of the kind identified?**

The Trustee undertook a full review of all disclosure material as it relates to insurance and made enhancements where required. Further training was provided to all staff, in particular call centre staff in respect of the Income Protection policy.

The Trustee has not otherwise identified any conduct, practice, behaviour or business activity engaged in since 1 January 2008 by the Trustee or by its directors, officers, employees or anyone otherwise acting on its behalf which it considers has fallen below community standards and expectations.

4. For an entity that is, or has a connection (other than an incidental connection) to, an RSE licensee of a registrable superannuation entity (as defined in the Superannuation Industry (Supervision) Act 1993 Cth):

- (a) During each of the past ten years (according to whatever annual reporting periods the entity has employed in the ordinary course of its operations) to what uses and in what amounts has the entity applied members' funds other than the investment of those funds, the administration of the superannuation fund and the payment of member benefits?**

The Commission's Terms of Reference do not define the meanings of "investment" of members' funds, "administration of the superannuation fund" or "payment of member benefits".

The Trustee has taken the view that "investment" and "payment of member benefits" are commonly understood to respectively mean "investment of the assets of the Fund" and "benefits paid to a member or beneficiary of the Fund in accordance with the terms of the Trust Deed".

In relation to “administration of the superannuation fund” the Trustee has, in collating the data for our response to question 4, applied the following test – “What costs could the Trustee strip out of members’ funds that are applied in the day to day administration of Intrust Super and still mean that the Fund could operate, albeit less successfully, and in our view not in members’ best interests:”.

Appendix 1 sets out the uses and amounts that members’ funds have been applied to during each of the ten (10) financial years ending 30 June 2017 that have been applied other than for the investment of members’ funds, the administration of the Fund and the payment of member benefits as have defined those terms.

(b) In respect of each kind of those applications of members’ funds, why was the application in the best interests of the members?

Applying the test we have adopted in relation to the meaning of the term “administration of the fund”, we have identified in **Appendix 1** costs incurred in respect of a number of activities which can be grouped under the following initiatives:

- Advertising, Branding, Promotion and Sponsorship;
- Market Research;
- Member, Employer Services and Education; and
- Financial Planning.

In respect of the application of members’ funds identified in our answer to question 4(a) above, the Trustee sets out the following observations in relation to the Trustee’s conclusion that each of those applications of members’ funds was in the best interests of members.

Advertising, Branding, Promotion and Sponsorship

By maintaining a broad membership base and increasing funds under management, the Fund can spread costs across the maximum possible number of members. This in turn minimises the impact that operating costs have on each member’s retirement savings while at the same time reducing the overall Management Expense Ratio (MER) of the Fund.

To maintain a broad membership base, the Fund must ensure that its brand remains relevant to existing members, and attractive to prospective members.

The Fund's strategy is to pursue cost effective ways to promote the Intrust Super brand as broadly as possible while increasing our national footprint and gaining access to key markets such as hotel accommodation, pubs, clubs, sport and associated businesses. This is in line with our business success and traditional core markets.

The Fund's key sponsorship arrangements provide cost effective, broad brand exposure and access to the key markets while additional consumer and trade-focused advertising helps the Fund broaden its membership base into and beyond these markets.

Market Research

It is in members' best interests to ensure product features are designed to meet their needs, and to ensure that any investment in advertising, branding and other marketing activities is current and relevant.

Research plays an important role in identifying the most appropriate products and services to provide to members and employers.

The Fund's strategy is to employ independent, external research, to gain insights and measurement into the following:

- Brand awareness;
- Overall member and employer satisfaction;
- Industry trends; and
- Fund outcomes as benchmarked against competitors.

These insights enable the Fund to invest in activities that ensure the Fund remains competitive in the marketplace.

Member, Employer Services and Education

Superannuation is a complex topic and a large percentage of our membership base, like that of other superannuation funds, has a natural apathy towards retirement savings. Providing education helps members make better informed financial decisions to maximize their retirement savings.

The majority of the Fund's members are employer sponsored. Ensuring employers remain up to date and cognizant of their superannuation obligations

is necessary to ensure members' entitlements are met. Providing the necessary educational support helps employers remain informed of their obligations.

A diverse membership and employer base requires a multi-channel strategy in delivering these services to the target audiences.

Channels employed to deliver services to members and employers include online, digital, trade shows, face to face and direct postal mail.

Financial Planning

To help members make the best financial decisions, members require access to financial education and advice. Financial planning services facilitates this.

All members have access to financial planning tools ranging from digital through to face to face financial planning services to help cover the diverse needs of the broad membership base.

(c) What are the cost centres that make up costs attributed to administration in each of those years?

The remaining costs, outside of those described in 4(a), relate to the outsourced administration and operation of the Trustee office itself as we have defined "administration of the fund". The activities undertaken by the Trustee office include the salaries and wages and the varied administrative activities associated with the member administration, accounting, investment operations, compliance, marketing and product design.

The cost centres that make up the costs attributed to administration of Intrust Super in each of the past ten years ending 30 June 2017 are set out in **Appendix 2**. The cost centres have been determined by reference to our audited financial statements.

Information provided

Intrust Super understands its duty to assist the Commission.

In preparing our answers to your specific questions we have reviewed all the records that we believed were relevant to the subject matter of your questions.

Intrust Super confirms that:

- all factual information provided in this response is true to the best of its knowledge and belief; and
- all opinions expressed are its genuinely held opinions.

Please let me know if you require anything further in relation to our response.

Yours sincerely



Brendan O'Farrell
Chief Executive Officer



Appendix 1 – Other Costs

Other Cost Centres	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Advertising, branding, promotion and sponsorship	1,070,724	888,716	1,103,237	1,285,894	1,389,135	642,226	755,543	1,025,002	1,511,125	1,747,756
Financial planning *	-	-	42,662	255,791	292,970	263,237	347,335	230,689	351,844	317,243
Market Research	35,930	15,818	51,602	17,627	84,846	108,189	159,497	220,216	62,756	70,381
Member, employer services and education	62,379	27,511	242,350	240,752	156,284	50,419	77,246	230,736	203,547	54,353
Total	\$1,169,033	\$932,045	\$1,439,850	\$1,800,064	\$1,923,235	\$1,064,071	\$1,339,621	\$1,706,644	\$2,129,272	\$2,189,732

*Commenced operation in June 2010

Appendix 2 – Administration Cost Centres

Administration Cost Centres
Accountancy & Audit
Bank Charges
Depreciation
Directors Fees - paid to employer organisation
Directors Fees - paid to individual directors
Government Fees
Insurance (excludes member insurance)
Legal, Compliance and other consulting fees
Motor Vehicle and Parking Costs
Office Administration
Office Rental
Outsourced Administrator Costs - Link Market Services (AAS)
Printing, Mailing and Postage
Property Expenses
Staff Costs
Staff Training
Subscriptions
Telephone
Travel & Accommodation
Utilities
Website Development