

NULIS Responsible Investment Policy

MLC Super Fund
MLC Superannuation Fund

14/11/2023

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1. Overview

1.1. Purpose

NULIS Nominees (Australia) Limited's (**NULIS's**) Responsible Investment Policy (**Policy**) recognises the role that Responsible Investment (**RI**) plays in the assessment, selection and monitoring process for investment options and outlines the protocols and processes for identifying and managing Environmental, Social and Governance (**ESG**) risks and opportunities (known as **ESG factors**).

The Policy forms part of NULIS's Investment Governance Framework (**IGF**) and should be read in conjunction with NULIS's Investment Governance Policy (**IGP**).

1.2. Objectives

The application of this Policy assists NULIS in meeting the following objectives:

- help Members meet their retirement goals by seeking strong long-term investment returns whilst managing risk; and,
- act in Members' best financial interests by seeking to understand and manage the ESG implications of the investment options available on our investment menus.

The objectives and requirements detailed in this Policy are fiduciary based and recognise the diverse needs of Members through including ESG and sustainability factors as a source of both identifying opportunity and managing risk for an investment option.

ESG and sustainability factors are defined in section 2.2.

1.3. Scope & Application

This Policy applies to the following Registrable Superannuation Entity (**RSE**) licensee within the Insignia Financial Ltd (**IFL**) group of companies:

- NULIS Nominees (Australia) Limited (NULIS)

All employees, including casual, temporary, and contracted employees as well as executives and non-executive directors and any third parties (collectively referred to as 'our people' in this Policy) acting on behalf of NULIS must comply with this Policy.

This Policy sets out broad principles on responsible investing including NULIS's:

- Responsible Investment (**RI**) Beliefs
- Approach to reporting and measurement of RI
- ESG, Ethical, Sustainable or Socially Responsible Investment options
- RI approaches used for the Directly Managed investment options
- Framework for applying Negative Screens and Controversial Holdings; and
- Position on Climate Change and Modern Slavery.

1.3.1. Directly Managed Investment Options

MLC Asset Management Services Limited (**MSL**) is currently appointed by NULIS as the Portfolio Manager (**PM**) to carry out portfolio management services supporting Directly Managed investment options of the MLC Super Fund.

NULIS recognises that in addition to having an approach to RI (as outlined throughout this policy), some Members want access to investment options specifically designed to address ESG, Ethical, Sustainable or Socially Responsible considerations. As a result, NULIS has designed a Directly Managed investment option named MLC Socially Responsible Growth which provides greater certainty over the exclusion of certain Controversial Holdings (e.g., tobacco and gambling), through the use of Negative Screens. More information on the MLC Socially Responsible Growth investment option is available in the relevant Product Disclosure Statement (PDS).

RI, Socially Responsible Investment and Negative Screens are defined in section 2.1.

For Directly Managed investment options not marketed as ESG, Ethical, Sustainable or Socially Responsible the approach to RI is outlined throughout this policy. NULIS requires MSL, in their role in relation to RI for the Directly Managed options, to complete the appropriate due diligence on Investment Managers (**Managers**) they select and ensure ESG considerations are assessed in the evaluation process. In accordance with this policy, all underlying Managers, whether they are a related or non-related party, must be able to demonstrate they have the capability to identify risks and opportunities associated with ESG issues (known as ESG Integration which is further explained in section 2.1) in their investment portfolios.

In addition, the status of related party RI or ESG policies is assessed annually as part of our related party Operational Due Diligence review.

NULIS has an Asset Consultant supporting them with RI related research, trend analysis and policy development.

1.3.2. Externally Managed Investment Options

Investment options are added to NULIS's respective investment menu/s, based on appropriate research and due diligence conducted by the Investment Governance Team. This may include the assessment of the Manager's approach to RI, including its disclosures about that approach as set out in its Product Disclosure Statement (PDS). The consideration of RI is one of many factors considered when selecting an investment option and may not necessarily preclude an investment option from being included on the menu, as it will be weighed against other factors.

Each Manager may have their own approach to RI, and their approach will vary based on the way the investment option is managed and the asset classes it invests in. For example, index or passive managers essentially track an index and are generally unable to take direct action and sell out of companies that demonstrate poor ESG characteristics. The content within this policy is limited to considering RI as part of the selection process for investment options, it does not outline each individual Manager's approach to RI.

Investment options marketed as ESG, Ethical, Sustainable or Socially Responsible must be "true to label" in the sense that the branding of the investment option aligns with its underlying

investment strategy including its asset allocation and, where relevant the degree of ESG Integration and the approach to Active Stewardship.

This policy does not apply to Direct Shares, with the exception of proxy voting.

2. Responsible Investment (RI)

2.1. What is Responsible Investment?

RI is a commonly used term to describe the practice of incorporating ESG factors into the research, analysis, and selection of investments, and the implementation of good stewardship practices.

The key pillars of RI are:

1. **ESG Integration** – identifying and considering ESG factors in the investment decision-making process to improve investment outcomes; and
2. **Active Stewardship** – exercising ownership rights such as proxy voting and engaging (where appropriate and practicable) with the issuing entities to improve investment outcomes.

ESG Integration and Active Stewardship are the key aspects of RI as practiced across the asset management industry and recognised by the global peak industry body Principles of Responsible Investment (PRI). These are also the main approaches adopted by NULIS and are aligned with our objectives. The extent to which ESG Integration and Active Stewardship are adopted depends on whether the investment option is Directly or Externally Managed, as outlined in section 1.3.

ESG Integration contributes to improved risk-adjusted returns for investors. Active Stewardship that supports good governance practices and acts to ensure companies, and other investment entities, appropriately consider material ESG factors and are managed in a way that contributes to the long-term sustainability and valuation of investments. Together, ESG Integration and Active Stewardship contribute to more attractive risk-adjusted returns for members.

ESG and sustainability factors are defined in section 2.2.

Various other investment approaches considered to be consistent with and complementary to RI, and the extent to which NULIS adopts them, are outlined below:

RI approach	Description	Extent adopted by NULIS*
'Socially Responsible' or 'Ethical' investing	The Manager emphasises moral or ethical considerations and values over other information that may be relevant to investment outcomes.	The MLC Socially Responsible Growth Option and Externally Managed investment options marketed as ESG, Ethical, Sustainable or Socially Responsible.

RI approach	Description	Extent adopted by NULIS*
'Sustainable Investing'	The Manager explicitly targets companies that have a measurable and specific benefit to society such as being aligned to one of the United Nations Sustainable Development Goals (SDGs).	Not currently adopted.
'Negative Screening'	The Manager excludes particular companies from an investment portfolio because of their particular business activity e.g., tobacco producers.	Section 2.6 provides more details on NULIS's Negative Screening approach.
'Positive Screening' or 'Thematic' investing	The Manager limits an investment portfolio to companies that undertake a specific activity e.g., renewable energy-related companies.	Not currently adopted.
'Impact' investing	Explicitly acknowledges that investment returns are made up of both financial returns and measurable societal benefits, representing an investment outcome that would not be achievable in the absence of the long-term commitment of members' capital (known as additionality).	Not currently adopted.

*For Externally Managed investment options, the Manager of an investment option may adopt a different approach to NULIS. More information on whether the Manager for an investment option uses these approaches, is available from the relevant PDS or the Manager's RI policy.

Future changes to the adoption of these investment approaches require approval from NULIS and must take into consideration Members' best financial interests.

2.2. ESG & Sustainability Factors

There are a broad range of ESG factors that may of themselves, or in combination, impact the risk profile and return characteristics of an investment. The following table shows some examples of areas covered by (but not limited to) the broad headings of Environment, Social and Governance:

Environmental (E)	Social (S)	Governance (G)
<ul style="list-style-type: none"> • Contribution to climate change initiatives through reduction in greenhouse gas emissions • Waste management • Energy efficiency • Water supply • Pollution • Biodiversity 	<ul style="list-style-type: none"> • Human capital management • Labour standards • Modern slavery • Diversity, Equity and Inclusion • Workplace health and safety • Integration with local community and earning a social licence to operate • Indigenous rights • Employee engagement 	<ul style="list-style-type: none"> • Rights, responsibilities and expectations across all stakeholders. • Board structure, diversity and independence • Executive remuneration (short and long-term incentives) • Bribery and corruption • Anti-competitive behaviour • Political lobbying and donations • Shareholder rights • Tax strategy

Sustainability is defined as a broad range of issues that impact an investment’s ability to generate long-term shareholder value. The Managers may consider sustainability issues as they relate to the investment vehicles that they invest in. These issues include, but are not limited to:

- Management as stewards of capital;
- The industry within which capital is being stewarded;
- Financial and physical capital (financial and manufactured assets on company balance sheets); and
- Non-financial capital (intangible forms of capital often not reflected on balance sheets such as human capital, social and relationship capital, natural capital, intellectual capital).

The consideration of ESG and sustainability factors, as they relate to making investment decisions, will continue to evolve and will be reflected in this Policy, as appropriate.

2.3. Responsible Investment Beliefs

NULIS believes that it is in members' best financial interests to consider ESG factors in investment decisions, where possible, and this belief is consistent with the objective of helping members meet their retirement goals by seeking strong long-term investment returns whilst managing risk.

These RI Beliefs are applied as outlined in section 1.3. They guide how ESG is considered within the selection process for the addition of new options to the investment menu. Investment decisions regarding RI will be made prioritising members' best financial interests.

The RI Beliefs are:

Belief 1: ESG factors can be a source of opportunity and risk in the management of investment options

- ESG factors can influence the risk profile and investment returns of investment options over the long term.
- Good outcomes for Members are best achieved by ensuring that wherever possible, the Manager gives appropriate consideration to ESG factors.
- Sound practice includes the application of RI in the assessment and monitoring of investment options selected for inclusion on our investment menus.

Belief 2: The inclusion of ESG factors assists in meeting long-term performance objectives

- The inclusion of ESG factors, such as climate change, requires a long-term focus. This is consistent with core aspects of our overall investment philosophy that emphasises a long-term view.
- The impact of ESG factors on an investment's financial performance tends to occur gradually, over time. Identifying ESG factors encourages and supports a greater focus on long-term thinking.
- NULIS expects an appropriate balance is used between quantitative and qualitative ESG analysis.

Belief 3: Company engagement and proxy voting can positively influence corporate behaviour

- Engagement (where appropriate) with entities (including via proxy voting) can result in improved practices and strategic decisions, creating the opportunity for enhanced investment outcomes for Members. For the Externally Managed investment options the Manager will conduct engagement in accordance with their own policies and procedures. In relation to the engagement activities for the Directly Managed investment options, section 2.4.1 outlines the requirements NULIS expects the PM to undertake.
- Proxy Voting will be conducted in accordance with the information outlined in the NULIS IGP.

Belief 4: Climate change creates significant long-term risks and opportunities that require special attention.

- Driven by the emission of greenhouse gases into the atmosphere, accelerating climate change carries significant risks to human health, economies and ecosystems. Effective responses will involve a combination of climate mitigation and adaptation measures.
- Since the 2015 Paris Agreement was signed, it is recognised that reaching net zero carbon dioxide emissions around 2050 is required to turn the goals outlined in the agreement into reality.
- Coupled with regulatory tailwinds, technological innovation is giving rise to increasing investment opportunities from the provision of climate and environmental solutions, in areas including clean energy and mobility, sustainable buildings and advanced materials. There is a growing number of specialised investment products – including low-carbon (active and index) investment options, sustainability-linked debt and others – we believe it is important to consider these investment opportunities.

These RI Beliefs will be regularly reviewed and, as best practice evolves, we will seek to continue to enhance our RI Policy and processes.

In addition, MSL as PM, is in the process of becoming a signatory to the Principles for Responsible Investment (PRI).

2.4. Measurement & Reporting

This section outlines the roles and responsibilities in relation to activities including measurement and reporting on the ESG exposures for investment options, NULIS's reporting requirements and ESG stress testing scenarios.

2.4.1. Directly Managed Investment Options

The PM has the role of engaging with underlying Managers in relation to whether they have appropriate RI or ESG policies and processes in place. At a minimum NULIS expects the PM to:

- Incorporate ESG Integration into its investment process to help manage risks and identify opportunities for Members.
- Monitor and collect ESG reporting from Managers at least on an annual basis, covering both their policies and approach.
- Report to NULIS on a quarterly basis on ESG activities including Manager ESG reviews and on proxy voting decisions considered as “material and contentious” by MSL's independent proxy voting adviser.
- Report annually to the Trustee on how this Policy is being applied and any substantive company engagement activities undertaken.

In addition, NULIS requires its Asset Consultant to:

- conduct climate change stress-testing of Directly Managed Investment Options (see section 2.4.3 below); and

- provide annual reports covering RI analysis and industry trends assessment.

2.4.2. Externally Managed Investment Options

The Investment Governance Team provides quarterly sector reviews which include the relevant 'socially responsible' or 'ethical' investment options.

2.4.3. Stress Testing

Investment options (including those marketed as ESG, Ethical, Sustainable or Socially Responsible options) are stress tested annually for climate change scenarios (in addition, to the traditional stress testing scenarios). The stress testing is conducted to understand the potential impact of the following climate change scenarios on performance and liquidity of the investment options:

- **Current Path (3 degrees)** – this scenario maps out a trajectory that reflects current policy settings, based on a detailed sector-by-sector assessment of what policies are actually in place or are under development by governments around the world. However, it assumes there are no material policy implementations unless they are backed with detail on how they're achieved.
- **Sustained Action (2 degrees)** – this scenario assumes that all aspirational targets announced by governments are met on time and in full, including their long-term net zero and energy access goals. Thus, demand for all fossil fuels decline by 2030. Emissions peak in the mid-2020s and fall to 12 Gt in 2050, resulting in a projected global median temperature rise in 2100 of 1.7 °C.
- **Net Zero by 2050 (1.5 degrees)** – this scenario maps out a way to achieve a 1.5 °C stabilisation in the rise in global average temperatures, alongside universal access to modern energy by 2030. In this scenario, CO2 emissions fall to 23 Gt in 2030 and to zero in 2050, a trajectory consistent with limiting the temperature increase to less than 1.5 °C in 2100.

The results are presented to the Board and/or Board Investment Committee for their review, and for consideration of any recommended actions.

2.5. Approach to ESG Integration & Active Ownership

The approach to ESG Integration and Active Ownership used by the PM, in the management of Directly Managed Investment Options, is outlined in the MSL Responsible Investment Policy.

2.6. Approach to Negative Screens

As a general rule, ESG Integration and Active Ownership through engagement with the entities' Boards of Directors and Management to understand and influence improvement in their practices, is more important to long-term Member outcomes than using negative screens.

However, negative screens remain a useful tool that we can use when we believe it to be in the best financial interests of Members, for example, in relation to Controversial Holdings.

Controversial Holdings are those companies or industries that have negative ESG characteristics that represent long-term risk to performance, and these long-term risks can't be mitigated by ESG Integration or Active Ownership.

There are a range of views with respect to Controversial Holdings such as gambling, alcohol, tobacco and weapons.

For Controversial Holdings, NULIS will assess a range of considerations to determine whether to apply negative screens across some or all of the Directly Managed investment options, including screens which apply to the MLC Socially Responsible Growth investment option. NULIS determines the appropriateness of the negative screens which are to be applied based on the following key considerations:

- Consumer preferences regarding Controversial Holdings
- Consideration of industry standards
- Contemporary views on RI, including reference to the Principles for Responsible Investment
- Consideration of the Your Future Your Super performance test
- Engagement with the Asset Consultant, and
- Implementation considerations.

Negative screens are applied in the following circumstances:

- Directly Managed investment options - will not invest directly in listed tobacco manufacturing companies. There may be times when there's a small level of unintended or indirect exposure to tobacco manufacturing companies (defined as a company that produces cigarettes and tobacco-related products) where the investment options are invested in:
 - index options,
 - futures, and/or
 - exchange traded funds.

More information in relation to the negative screen applied to listed tobacco manufacturing companies is available in the relevant PDS.

- MLC Socially Responsible Growth investment option – uses negative screens to exclude companies that are involved in some business activities (e.g., tobacco and gambling) that are considered by NULIS to conflict with certain moral and ethical considerations and values that are consistent with the investment option's Socially Responsible name. More information is available in the relevant PDS.

The process used to determine whether to exclude specific companies from Directly Managed investment options, including any Socially Responsible investment options is outlined in the MSL Responsible Investment Policy and is in accordance with the investment parameters that NULIS has approved.

Negative Screens will be reviewed annually by the PM and Asset Consultant. The results are presented to the Board Investment Committee for their review, and for consideration of any recommended actions.

3. Position on Climate Change & Modern Slavery

NULIS recognises the importance of Climate Change and Modern Slavery as having financial implications including risks for the investments of its investment options and therefore long-term returns to members. The following position statements (as outlined in section 3.1 and 3.2) apply to the Directly Managed investment options (unless stated otherwise) and may contain aspirational commitments. The statements will be reviewed and developed annually as best industry practice evolves.

For Externally Managed investment options, when an investment option is considered for inclusion on the investment menu, Manager due diligence is conducted which may include, where possible, consideration of the Manager's position on climate change, modern slavery and controversial holdings. However, the Manager's position does not necessarily preclude an investment option from being included on the menu, as it will be weighed against other factors.

However, where we are adding an investment option to the menu which is promoted as either ESG, Ethical, Sustainable or Socially Responsible, we will assess the Manager's position, considering this policy and contemporary views on these issues.

The specific position an external Manager adopts about climate change, modern slavery and controversial holdings will be outlined in their RI policies and procedures.

3.1. Climate Change

Climate change will have direct and indirect financial implications for investments in all asset classes and therefore long-term member returns.

Consistent with RI Belief 1, NULIS recognises that Managers who consider climate risks can enhance risk-adjusted returns relative to investors who are agnostic to those risks. As such, for the Directly Managed investment options, the PM may consider the following measures to support a more comprehensive understanding of climate risk:

- encourage Managers to demonstrate and report on their approach to evaluating climate risk within their portfolios and to disclose to the PM the investment processes supporting their views;
- encourage Managers to improve disclosure of material climate change impacts, consistent with the recommendations of the Task Force on Climate Related Financial Disclosure (TCFD);
- encourage Managers to engage proactively with entities to establish and implement approaches to reducing their carbon emissions that are also aligned with the long-term best financial interests of Members; and
- contribute to industry initiatives to increase awareness of climate change and the implications for investment decision making, by participating in relevant industry forums and collaborative initiatives, such as the Investor Group on Climate Change.

3.2. Modern Slavery

Consistent with RI Belief 1 that ESG considerations can influence the risk profile and returns of portfolios over the long term, NULIS recognises that the "social" component includes the

importance of human capital management, working conditions and labour standards as potential risks in investment entities and their supply chains.

The *Modern Slavery Act (2018)* (Cth) requires entities of a certain size and revenue threshold to report on modern slavery risks in their own operations as well as their supply chains, and in the case of investors, the supply chains of underlying investee companies. There is also an expectation that entities who do not meet the minimum size/revenue levels will voluntarily report.

While there is no globally agreed definition of modern slavery, the identifying feature is the involuntary aspect of taking the job or accepting sub-standard working conditions, and a penalty or threat of penalty to prevent the individual from leaving the situation. Coercion can take many forms from physical or sexual violence to subtler means such as withholding wages or retaining identity documents, or the threat of denunciation to authorities.

This Position Statement covers Modern Slavery monitoring and reporting from an external investment Manager perspective. As detailed in the *IFL Group Modern Slavery Policy (Modern Slavery Policy)*, external Managers are included in the definition of “Suppliers” for the purpose of the Know Your Supplier requirements under the Modern Slavery Policy.

The requirements for monitoring and reporting on external Managers are outlined in the Modern Slavery policy.

NULIS requires MSL to capture information on Modern Slavery for the Directly Managed investment options as part of Manager due diligence.

4. Consequence of Non-Compliance

Non-compliance with this Policy may result in disciplinary action in line with our Code of Conduct and Consequence Management Framework. A breach of the policy may be a breach of legislation or prudential standards. All breaches will be managed in accordance with the Incident & Breaches Policy.

Any exemptions to the Policy must be agreed by the relevant executive policy owner and Chief Risk Officer. It must be tabled at the appropriate Risk and Compliance Committees in a timely manner and may subsequently be reported to the Board(s).

5. Review & Approval

This Policy will be reviewed annually by the Policy Owner, any material changes must be approved by the relevant board(s).

Non-material amendments to this Policy may be approved by the board(s) delegated authority in accordance with NULIS’s Delegations.

All documents should be updated more frequently if there is a change in legislation, regulation, or operating environment.

6. Document Information

6.1. File Details

Title	NULIS Responsible Investment Policy
Owner	General Manager, Investment Governance
Approved by	NULIS Board
Hierarchy level	Level 1 – Board Approved Policy
Effective date	1 December 2023
Last reviewed	October 2023
Next review	October 2024
Atlas ID	1045743

6.2. Revision History

Version	Date released	Author(s)	Description
1.0	1 December 2022	Orla Cowan	Template updated to Insignia Financial template and common wording applied across the NULIS RI Policy.
2.0	1 December 2023	Orla Cowan	Annual review.

Appendix 1: Roles & Responsibilities

Roles & responsibilities	
Roles	Responsibility
Asset Consultant	<p>The Asset Consultant provides independent advice to NULIS on investment matters relating to Directly Managed investment options within the MLC Super Fund (MLCSF). These matters include RI.</p> <p>Some examples of services the Asset Consultant provides to NULIS include advice on:</p> <ul style="list-style-type: none"> • Investment strategy (including on RI and ESG factors) and investment philosophy. • Setting and reviewing investment parameters including investment objectives, asset classes and allocations, target returns, standard risk measure and fees. • Regulatory compliance, for example, Your Future Your Super (YFYS) Performance Tests and APRA reporting requirements.
Board	<p>The Board is responsible for ensuring NULIS meet it's fiduciary, statutory and regulatory responsibilities as they relate to investment activities, including RI. In relation to RI, the Board is responsible for:</p> <ul style="list-style-type: none"> • Approving the RI Policy, including (but not limited to) establishing Objectives for the Policy, outlining RI Beliefs and specifying the Scope and Application of the Policy. • Approving the RI Strategy, looking at industry best practice, member trends and regulatory change impacting RI and formulating an appropriate strategy. • Approving the use of Negative Screens and other approaches which complement RI and apply either across the Fund or at the individual investment option level. • Appointing service providers to undertake RI activities.
Board Investment Committee	<p>A committee of the Board is known as the Superannuation Trustee Investment Committee (STIC).</p> <p>The STIC is responsible for supporting the Board in relation to investment matters including (but not limited to):</p> <ul style="list-style-type: none"> • Reviewing, endorsing and recommending approval by the Board of changes to the RI Policy. • Approving new investment options, including those promoted as ESG, Ethical, Sustainable or Socially Responsible. • Approving changes to parameters (e.g., investment fees, investment objectives and asset allocations) for any investment options, including those promoted as ESG, Ethical, Sustainable or Socially Responsible. • Approving the way Negative Screens or other complementary RI approaches are applied.

	<ul style="list-style-type: none"> Overseeing the reporting and measurement of RI activities, as outlined in the RI Policy.
Risk Management	<p>The Risk Management function, as the 2nd line of defence, is responsible for:</p> <ul style="list-style-type: none"> Overseeing and challenging the RI activities and provision of appropriate policy, tools, guidance, insight, and reporting. Facilitating the setting of risk appetite in relation to RI risks. Providing subject matter expertise to guide and assist in all steps throughout RI Policy development and maintenance. Providing advice and consultation to business management on matters relating to the RI Policy. Assist with the development of controls and control testing in relation to the RI Policy, including RI activities outlined within the policy.
Insignia Legal	<p>The Insignia Legal team provides:</p> <ul style="list-style-type: none"> Advice on whether NULIS has satisfied its legal requirements in relation to RI, as requested, and Support to the Trustee on matters relating to RI, including the review of the RI Policy and RI Disclosure.
Investment Governance Team	<p>The Investment Governance Team is the 1st line of defence and is responsible for:</p> <ul style="list-style-type: none"> Developing the RI Policy (in accordance with group templates and guidelines). Maintaining, reviewing, and testing the RI Policy annually at a minimum, or more frequently if material changes have occurred. Assessment of all new investment options' approach to RI, where possible Ensuring controls in relation to RI are appropriate and current. Ensuring all employees with a designated role in relation to RI are made aware of, and trained for their role, responsibilities, and accountabilities with respect to this policy. Rectifying RI issues, incidents and action plans arising from testing and internal audit reviews. Liaising with other Insignia teams to ensure successful operationalisation of this RI policy. Assisting in the governance related to the approvals for RI parameters and new RI investment option development. Developing the RI Strategy, along with key stakeholders including the Portfolio Manager, Member Office, Asset Consultant and the Board. Conducting monitoring and reporting activities in accordance with the RI Policy.
Member Office	<p>The primary role of the Member Office in relation to RI is:</p>

	<ul style="list-style-type: none"> • Support the RSE Boards in monitoring Service Providers in relation to their responsibilities in relation to RI (in accordance with SPS231 Outsourcing). • Review policies and papers in relation to any approvals for RI. • Ensuring implementation of any changes to the RI Policy are in accordance with the requirements of SPS530. • Represent the RSE Boards as a Member advocate in key RI related forums.
<p>Portfolio Manager</p>	<p>The Portfolio Manager or MLC Asset Management Services Limited (MSL) provides portfolio management services for each directly managed investment option within the MLCSF.</p> <p>Some examples of what the Portfolio Manager is responsible for in relation to RI include:</p> <ul style="list-style-type: none"> • Developing the investment strategy for RI options (this includes asset allocations and risk budgets) in line with NULIS’s RI beliefs, policies and objectives. • Constructing a portfolio using RI strategies and managers within each asset class (where possible) based on NULIS’s fees and risk budgets. • Appointing, monitoring, evaluating and terminating investment managers and considering their RI processes. • Providing regular RI reporting to NULIS. • Providing expertise in relation to RI investment matters.

Appendix 2: Key Concepts & Definitions

Key concepts and definitions	
Terms	Definitions
APRA	Australian Prudential Regulation Authority.
AREs	APRA Regulated Entities.
ASX	Australian Stock Exchange.
Board	Reference to IFL and its subsidiary boards including its licensed entity boards (combined or individually), in this case NULIS Nominees (Australia) Limited (NULIS).
Directly Managed Investment Options	An investment option which has been constructed for the purpose of satisfying an investment objective prescribed by the Trustee and for which it has ultimate responsibility with regard to its management and ongoing monitoring.
Documents	Reference to our policies, charters, terms of reference, procedures, guidelines, plans, codes, frameworks, strategies, and statements (including any other supporting artefacts).
Executive Team	The executive management team of IFL comprises the following: <ul style="list-style-type: none"> • Chief Advice Officer; • Chief Asset Management Officer; • Chief Corporate Affairs & Marketing Officer; • Chief Distribution Officer; • Chief Financial Officer; • Chief Legal Officer; • Chief Member Officer; • Chief Operating & Technology Officer; • Chief People Officer; • Chief Risk Officer; • Chief Transformation Officer; and • Group Company Secretary.
IFL	Insignia Financial Ltd (ABN 49 100 103 722) and or “Insignia”.
IFL Board	The Board of IFL.
Insignia Financial or the group	IFL, the IFL subsidiaries and related bodies corporate.

<p>Investment Governance Framework (IGF)</p>	<p>The Investment Governance Framework ('IGF') for NULIS Nominees (Australia) Limited ('the Trustee') is the totality of systems, structures, policies, processes, and people to address the Trustee's responsibilities with regard to investments of each RSE within its business operations.</p> <p>NULIS is the Trustee for the MLC Super Fund and the MLC Superannuation Fund / MLC Pooled Superannuation Trust, DPM Retirement Service and the Premium Choice Retirement Service (collectively "Super Wrap").</p>
<p>Investment Manager (Manager)</p>	<p>An entity responsible for the execution and management of an investment option approved by the Trustee.</p> <p>An Investment Manager is an entity appointed by NULIS (or appointed by MSL under delegation from NULIS) to manage a portfolio of assets under an investment option approved or adopted (as it relates to registered investment management schemes) by the Trustee.</p>
<p>Investment Menu</p>	<p>An investment menu refers to the suite of Investment Options which are offered to Members of a particular NULIS product.</p>
<p>Investment Option</p>	<p>An 'investment option' refers to a pooled investment arrangement which is offered to Members.</p>
<p>Investors</p>	<p>Investors in any investment scheme operated by any entity within IFL in its capacity as the RE and investors in investor directed portfolio services issued by entities within IFL in its capacity as the RE.</p>
<p>Management</p>	<p>The management of Insignia Financial.</p>
<p>Member</p>	<p>A Member of any superannuation fund for which any entity within the Group is the RSE Licensee.</p>
<p>MLC</p>	<p>The superannuation, investment and asset management and advice business owned by Insignia Financial.</p>
<p>MLC Superannuation Fund</p>	<p>NULIS is Trustee for MLC Superannuation Fund / MLC Pooled Superannuation Trust, DPM Retirement Service and the Premium Choice Retirement Service (collectively "Super Wrap"). The Super Wrap has a range of Products Members are invested in.</p>
<p>MLC Super Fund</p>	<p>NULIS is Trustee for the MLC Super Fund which includes a range of Products Members are invested in which are branded MLC MasterKey and Plum.</p>
<p>MLC Asset Management Services Limited (MSL)</p>	<p>MLC Asset Management Services Limited (MSL) is currently appointed by NULIS as the Portfolio Manager; to carry out portfolio management services supporting Directly Managed investment options of the MLC Super Fund.</p>

NULIS -‘we’, ‘us’, ‘our’	NULIS Nominees (Australia) Limited (NULIS).
Owner	The Owner is responsible for the Document at all stages of the policy lifecycle.
People	Reference to employees of Insignia Financial, may also include contractors and other individuals working for or on behalf of the group.
Portfolio Manager (PM)	MLC Asset Management Services Limited (MSL) is currently appointed by NULIS as the Portfolio Manager; to carry out portfolio management services supporting Directly Managed investment options of the MLC Super Fund.
Policy	Principles to guide decisions and achieve rational outcomes and outlined positions in operational matters.
Products	<p>Products for the purposes of the Policy refer separately or collectively where relevant to Superannuation Products, including:</p> <p>MLC Super Fund products:</p> <ul style="list-style-type: none"> • MLC MasterKey Business Super • MLC MasterKey Personal Super • MLC MasterKey Super & Pension Fundamentals <p>MLC Superannuation Fund products:</p> <ul style="list-style-type: none"> • MLC Wrap Super Series 1 & 2 • MLC Navigator Retirement Plan Series 1 & 2 (and badges which are: <ul style="list-style-type: none"> ○ PremiumChoice Retirement Service (the Service) products: PremiumChoice Retirement Service Series 1 & 2 ○ DPM Retirement Services (the Service) products: DPM Retirement Service Series 1 & 2)
RE	A responsible entity, being the company named in ASIC’s record of the scheme’s registration as the responsible entity of the investment scheme in accordance with s601EB of the Corporations Act.
Related Party	In relation to an ARE or an RE, a related body corporate within the meaning of the <i>Corporations Act 2001</i> (Cth).
Responsible Investment (RI)	RI is an umbrella term used to describe methodologies that incorporate ESG and sustainability considerations into the analysis, selection and monitoring of investments.
RSE	A registrable superannuation entity, which is a regulated superannuation fund or an approved deposit fund or a pooled superannuation trust but does not include a self-managed superannuation fund. Registration of RSEs is affected under Part 2B of the Superannuation Industry (Supervision) Act 1993.

Socially Responsible Investment options	Socially responsible investment is an investment approach which prioritises various moral or ethical issues and values over other information that may be relevant to investment outcomes.
Stress Testing	Mechanism used to better understand the sources and quantum of known and unforeseen risks by testing how an investment strategy might perform under various stress scenarios.