

# Report to the Trustee on the Actuarial Investigation as at 30 June 2020

# Heritage Bank Limited Superannuation Plan

(a plan in IOOF Employer Super)

4 December 2020

welcome to brighter

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# **Key Results and Recommendations**

This report on the actuarial investigation of the Heritage Bank Limited Superannuation Plan (the Plan) as at 30 June 2020 has been prepared to meet the requirements of the Plan's governing rules and the SIS legislation. This report should not be relied upon for any other purpose or by any party other than the Trustee of the Plan. Mercer is not responsible for the consequences of any other use. This report should be considered in its entirety and not distributed in parts. The Trustee should share this report with the Employer who contributes to the Plan. The Employer may consider obtaining separate actuarial advice on the recommendations contained in the report.

## **Change in Financial Position**

The following table summarises the Plan's financial position, at both this and the previous actuarial investigation.

Position at 3	Position at 30 June 2020		Position from 30 June 2017 Investigation Report	
\$000	Asset Coverage	Projected Coverage at 30 June 2020	Coverage at 30 June 2017	
	156.7%	117%	135.5%	
	134.1%	108%	108.8%	
	138.7%	n/a	110.8%	
	235.3%	n/a	210.6%	
		\$000      Asset Coverage        I      156.7%        I      134.1%        I      138.7%	Position at 30 June 2020Investigation\$000Asset CoverageProjected Coverage at 30 June 2020100156.7%117%134.1%108%138.7%n/a	

\* The above totals exclude f additional accumulation balances for defined benefit members, and accumulation members as at 30 June 2020.

The asset coverage of vested benefits (both as of right and allowing for early retirement from age 55) at 30 June 2020 was were higher than the levels at the previous actuarial investigation, due to the following items of positive experience:

- salary growth of 1.7% pa which was lower than expected (3.0% pa);
- the payment of a benefit upon the death of a member which, after the receipt of insurance proceeds, resulted in a net outflow from the Plan that was lower than the member's vested benefit; and
- the reduction in the number of members from nine to five, which has the effect of spreading the surplus over a smaller membership base.

This has been slightly offset by the negative impact of employer contributions paid at a rate below the cost of the benefits that accrued and expense incurred over the period.

### **Recommended Contribution Rates and Projections**

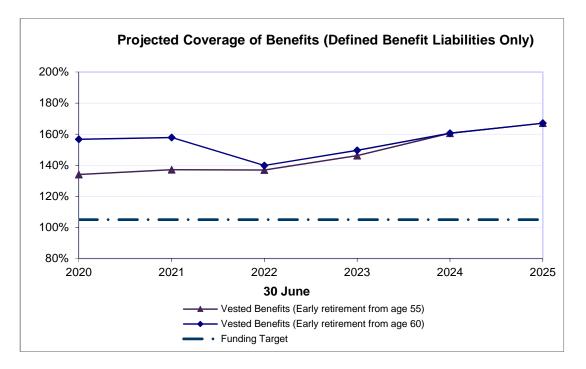
At 30 June 2020, the Plan was in a satisfactory financial position. The 156.7% coverage of the Vested Benefits (Early Retirement as a right from age 60) was significantly above the 100% requirement under SIS legislation for the Plan to be considered in a satisfactory financial position. The 134.1% coverage of Vested Benefits (Early Retirement from age 55) is also above the financing objective of 105% coverage adopted for this investigation.

Based on the financial position at 30 June 2020, I recommend that the Employer contributes to the Plan in accordance with the following contribution program:

- Defined Benefit members:
  - 7% of salaries for all defined benefit members until 31 December 2020 and nil thereafter, plus
  - An additional 5.9% of deemed member contributions for Category B,C and D members, plus
  - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).
- Accumulation members:
  - At the required rate to meet the Employer's obligations under Superannuation Guarantee legislation or employment agreements, plus
  - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).

The recommended contribution program is expected, on the basis of the actuarial assumptions adopted for this investigation, to result in the Plan continuing to meet its financing objective at 30 June 2023.

Based on the assumptions adopted for this investigation and the recommended contribution rates, and allowing for any material experience after the investigation date as detailed in this report, I have prepared the following projection of Plan assets and benefit liabilities:



The graph above shows that the recommended contributions are anticipated to result in assets of at least 105% of Vested Benefits (Early Retirement from age 55), which is the financing objective adopted in this investigation, over the period to 30 June 2023.

The graph also shows the coverage level of assets compared with the Vested Benefits (Early Retirement as a right from age 60). The coverage of this measure is expected to stay well above 100% over the three years to 30 June 2023.

### **Risks**

The Trustee should note that the above projection is based on the assumptions adopted, which represent a single scenario from a range of possibilities. The future is uncertain and the Plan's actual experience will differ from these assumptions; these differences may be minor in their overall effect, or they may be significant and material. In addition, different sets of assumptions or scenarios may also be within the reasonable range and results based on those alternative assumptions would be different. However the coverage ratios should be reviewed regularly the Trustee. The Trustee's monitoring of the experience specified in the Notifiable Events section of the Funding and Solvency Certificate will provide a further means of identifying adverse experience which warrants an immediate review of the Plan's financial position.

Sections 7 and 8 provide illustrations of the impact of investment volatility on the projected coverage of Vested Benefits and shows that a 1% pa reduction in the assumed future investment return would result in a 2.9% increase in the assessed value of liabilities.

Sections 8 and 9 discuss other risks associated with the liabilities, including small plan and legislative risk.

## **Other Findings and Recommendations**

#### **Suitability of Policies**

I am satisfied that the following current policies for the defined benefit section of the Plan are suitable:

- The investment policy for the defined benefit section of the Plan is suitable.
- The crediting rate policy for the defined benefit section of the Plan is suitable.
- The insurance arrangements for the defined benefit section of the Plan are suitable.
- The Shortfall Limit (for the purposes of SPS 160) for the defined benefit section of the Plan is suitable.
- The Trustee's process for monitoring the Plan financial position is suitable.

## **Actions Required by the Trustee**

The Trustee should consider this report and confirm its agreement (or otherwise) to the contribution rate recommendations.

The Trustee should seek formal agreement from the Employer to contribute in line with the recommendations.

# Introduction

# **Background of the Plan**

The Plan is operated for the benefit of employees of Heritage Bank Limited and is a sub-plan of IOOF Employer Super. The Trustee of IOOF Employer Super, IOOF Management Limited, holds a Registrable Superannuation Entity Licence under the SIS legislation and operates the Plan as required under the Trust Deed.

The Plan is a resident regulated fund and a complying superannuation fund for the purposes of the SIS legislation. The Plan is taxed as a complying superannuation fund.

The advice contained in this report is given in the context of Australian law and practice. No allowance has been made for taxation, accountancy or other requirements in any other country.

The governing rules of the Plan are set out in the IOOF Portfolio Services Superannuation Plan trust deed dated 20 June 1994 (as amended).

### **Purpose**

I have prepared this report exclusively for the Trustee of the Heritage Bank Limited Superannuation Plan for the following purposes:

- To present the results of an actuarial investigation of the Plan as at 30 June 2020;
- To review Plan experience for the period since the previous actuarial investigation as at 30 June 2017;
- To recommend contributions to be made by the Employer intended to allow the Plan to meet its benefit obligations in an orderly manner, and to reach and maintain an appropriate level of security for members' accrued benefit entitlements;
- To satisfy the requirements of the Plan's Trust Deed for actuarial investigations of the Plan's financial position; and
- To meet legislative requirements under relevant Commonwealth superannuation legislation.

It has been prepared in accordance with the requirements of the Trust Deed, the Superannuation Industry (Supervision) Act 1993 and associated regulations (SIS legislation), Prudential Standard SPS 160 issued by APRA and Professional Standard 400 issued by the Actuaries Institute setting out requirements for actuarial investigations of defined benefit superannuation funds under SIS legislation. The previous actuarial investigation was conducted as at 30 June 2017 by Stuart Mules, on behalf of Mercer, and the results are contained in a report dated 28 November 2017.

# Significant Events since the Investigation Date

We are not aware of any significant events that have occurred since 30 June 2020 which would have had a material impact on the findings or recommendations in this report.

# **Experience since the Last Review**

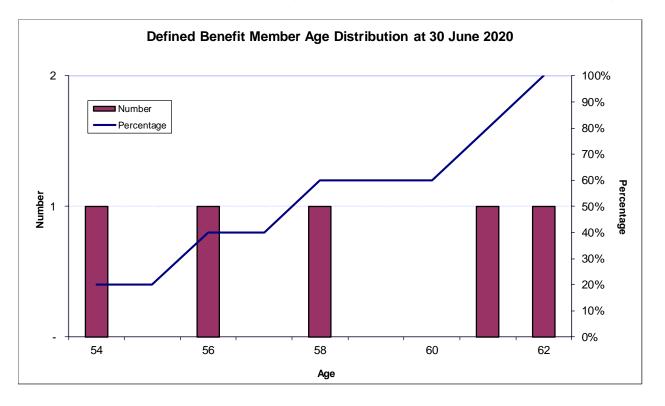
# Membership

The membership of the defined benefit section has changed since 30 June 2017 as follows:

Active members at 30 June 2017	9
Exits	4
New Entrants	0
Active members at 30 June 2020	5
Total salaries at 30 June 2020	
Average salaries at 30 June 2020	
Average age at 30 June 2020	58.9 years

In addition, there were 457 members at 30 June 2020 whose benefits are determined wholly on a defined contributions (or 'accumulation') basis. All new members join the accumulation section of the Plan.

During the period under review the number of defined benefit members within the Plan decreased from nine to five. This means that the surplus is spread over a smaller number of members so that the coverage of the benefit liabilities (when expressed as a percentage) increases accordingly.



#### The defined benefit membership split by age as at the 30 June 2020 is shown in the following graph:

#### **Investment Returns**

The table below shows the rates of investment earnings (after tax, investment fees and asset based administration fees) for the assets supporting the defined benefits of active members, and crediting rates applied to defined benefit members' accounts, over the period since the previous investigation.

Year Ending	Investment Return (pa)	Crediting Rate(pa)
30 June 2018	5.7%	5.2%
30 June 2019	4.8%	4.8%
30 June 2020	1.9%	1.9%
Compound Average	4.1%	4.0%

The average investment return for the three year period to 30 June 2020 was 4.1% p.a., consistent with our long term assumption at the last actuarial investigation of 4.1% p.a. Crediting rates were also approximately equal to the investment returns. Investment returns had a neutral impact on the Plan's financial position.

### **Salary Increases**

Salaries for the current defined benefit members increased by an average of 1.7% pa over the period compared to our longer term assumption at the last actuarial investigation of 3.0% pa. The lower salary increase than assumed had a positive impact on the Plan's financial position.

# Contributions

The Employer contributions paid since the date of the previous actuarial investigation were as follows:

- Defined Benefit members:
  - 15% of salaries for all defined benefit members until 31 December 2017 and 7% thereafter, plus
  - An additional 5.9% of deemed member contributions for Category B,C and D members, plus
  - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).
- Accumulation members:
  - At the required rate to meet the Employer's obligations under Superannuation Guarantee legislation or employment agreements, plus
  - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).

The Employer contributions paid over the review period were lower than the long term Employer contribution rates (i.e. the estimated employer cost of future service benefits), which had a small negative impact on the Plan's financial position. The recommended reduction in contributions was delayed beyond 1 January 2018, but apart from this contributions paid were in line with recommendations.

# Impact of the Experience on the Financial Position

The main experience items affecting the Plan's financial position during the period from 30 June 2017 to 30 June 2020 were as follows:

ltem	Assumption at previous review	Plan experience	Comment on effect
Investment returns	4.1% p.a.	4.1% p.a.	Neutral effect – investments grew at a rate equal to that assumed
Salary increases	3.0% p.a.	1.7% p.a.	Positive effect - benefit liabilities grew at a lower rate than assumed
Membership Changes		4 exits	Positive effect – excess assets spread over smaller membership base, and net outflow for death benefit less than member's vested benefit

# **Actuarial Assumptions**

The ultimate cost to the Employer of providing the benefits to members is:

- the amount of benefits paid out; and
- the expenses of running the Plan, including tax;

less

- members' contributions; and
- the return on investments.

The ultimate cost to the Employer will not depend on the actuarial assumptions or the methods used to determine the recommended Employer contribution, but on the actual experience of the Plan. The financing method and actuarial assumptions adopted will however affect the timing of the contribution requirements from the Employer.

The actuarial process includes projections of possible future Plan assets and benefit liabilities on the basis of actuarial assumptions about future experience.

These assumptions include investment returns, salary/wage increases, crediting rates, the rates at which members leave the Plan for various reasons, and other factors affecting the financial position of the Plan.

It is not expected that these assumptions will be precisely borne out in practice, but rather that in combination they will produce a model of possible future experience that is considered a suitable basis for setting contribution rates.

### **Economic Assumptions**

The most significant assumption made in estimating the cost of defined benefits is the difference between:

- the assumed rate of investment earnings; and
- the rate of salary increases used in the projections of future benefit payments.

This difference is commonly referred to as the "gap".

The key economic long term assumptions adopted for this investigation are:

	Assumption
Investment returns (after tax, investment and asset based administration fees)	3.0% p.a.
Crediting rate (after tax and investment fees)	3.0% p.a.
General salary increases	2.0% p.a.

The assumption for investment returns is based on the expected long-term investment return for the Plan's benchmark investment mix of the IOOF MultiMix Balanced Trust, Capital Secure Trust and Cash Account, calculated using Mercer's assumptions of the means and standard deviations of returns from the various underlying asset classes and the correlations of returns between those asset classes.

The salary increase assumption is based on long term economic forecasts for future increases in average weekly earnings (AWOTE) and discussions with the Employer.

## **Demographic Assumptions**

#### Retirement

The rates at which members are assumed to leave the Plan due to retirement are set out in Appendix B. It is assumed that Employer consent is granted for early retirement, where required. I have maintained the same assumptions in relation to the rates at which members retire. Given the small size of the Plan, these are based on the experience of similar Plans administered or advised by Mercer.

#### **Resignation, Death and Disablement in Service**

It is assumed that none of the remaining members will leave the Plan due to resignation, death or disablement.

#### Retrenchment

No specific allowance is made for the possibility of future retrenchments.

### **Other Assumptions**

#### **New members**

The Plan's defined benefit section is closed to new entrants. No allowance has been made for new members.

#### **Expenses**

Administration costs, management expenses and actuarial consulting fees plus the net cost of group life insurance for defined benefit members are deducted from plan assets. Based on recent experience these are assumed to average 3.2% of defined benefit members' salaries (for group life and income protection insurance costs) plus \$20,000 per annum indexed at 2% per annum (for consulting and other fees).

#### Tax

It is assumed that the current tax rate of 15% continues to apply to the Plan's assessable income, along with current tax credits and deductions.

All future Employer contributions are assumed to be subject to 15% contribution tax, after deduction of any insurance premiums and administration and management costs. All contribution recommendations quoted in this report are gross of contributions tax.

No allowance has been made for:

- Any surcharge liability as members' benefits will be reduced by a surcharge offset account equal to the surcharge payments made, accumulated at the Plan crediting rate. Surcharge was abolished with effect from 1 July 2005.
- Excess contributions tax, as this is payable by the member.
- Additional tax on contributions (including defined benefit notional contributions) for those with incomes higher than \$250,000, which is also payable by the member.

# **Impact of the Changes in Assumptions**

The following table sets out changes in assumptions from those used in the previous investigation and the reasons for the changes:

Item	Investigation at 30 June 2020	Investigation at 30 June 2017	Reason for change
Investment returns	3.0% p.a.	4.1% p.a.	Expected return based on Mercer's latest investment return model allowing for investment tax and asset based fees.
Salary increases	2.0% p.a.	3.0% p.a.	Following discussions with the Employer

The overall impact of the changes in assumptions was to:

- increase the Actuarial Value of Accrued Benefits by \$14,000
- increase the assessed long-term employer cost of future service benefits by 0.2% of salaries from 15.5% to 15.7%.

# Assets

# **Market Value**

The net market value of the Plan's assets as at 30 June 2020 amounted to **assets as at 30 June 2020** amounted to **assets as at 30 June 2020** amounted to **assets assets as at 30 June 2020** amounted to **assets assets as at 30 June 2020** amounted to **assets assets as at 30 June 2020** amounted to **assets assets as at 30 June 2020** amounted to **assets assets as at 30 June 2020** amounted to **assets as at 30 June 2020** amounted to **as at 30 June 2020** 

Calculation of Defined Benefits Assets at 30 June 2020		
Net market value of the Plan's assets as at 30 June 2020		
Less accounts for accumulation members	-	
Less accumulation accounts for defined benefit members		
Net assets to support the defined benefit liabilities of the Plan		

The table below shows the breakdown of the defined benefit assets in each of the investment options:

Investment Option	Amount (\$) as at 30 June 2020
IOOF Multimix Balanced Growth Trust	
IOOF Capital Secure Trust	
Cash Account	
IOOF Multimix Capital Stable Trust	
Accrued Taxes	
Total Assets	

### **Operational Risk Reserves**

The assets to meet the Trustee's Operational Risk Financial Requirement (ORFR) are held separately from the assets of the Plan.

The scope of this Investigation does not include a review of the adequacy of assets held to meet the Trustee's ORFR or the Trustee's ORFR strategy.

# **Investment Policy**

#### Assets backing defined benefit liabilities

The Plan's current investment strategy for assets supporting defined benefit liabilities, involving a mix of IOOF Multimix Balanced Growth Trust, IOOF Capital Secure Trust and the Cash Account, has a benchmark 49% exposure to 'growth' assets such as shares and property and a benchmark 51% exposure to 'defensive' assets such as cash and fixed interest. 'Growth' assets are expected to earn higher returns over the long term compared to 'defensive' assets, but at the same time to exhibit more variation in returns from year to year.

The actual asset allocation and Strategic Asset Allocation for the assets supporting the defined benefit liabilities are as follows:

Asset Class	Actual Allocation as at 30 June 2020	Strategic Asset Allocation
Australian equities	15%	17%
Overseas equities	19%	19%
Property	7%	7%
Other growth	7%	6%
Total growth	48%	49%
Fixed interest	24%	23%
Other defensive	4%	4%
Cash	24%	24%
Total defensive	52%	51%
Total	100%	100%

The defined benefit retirement benefit is not typically affected by the investment return on the Plan's assets being based on salary and service. However, the resignation benefits and the SG minimum benefits are affected by the investment return. The volatility of the Plan's investment returns therefore has some effect on the financial position of the Plan from year to year and is likely to impact on the required level of Employer contributions.

Given that it is not known when members will take their benefit with certainty, the exact term of the Plan's liabilities is unknown. However, all members will reach normal retirement age within the next 11 years.

The Plan's investments are expected to provide a high level of liquidity in normal circumstances. Hence we do not envisage any problem in being able to redeem assets to meet benefit payments as they arise

I am satisfied that the current investment strategy is appropriate in view of the Plan's longer term cash flows and the financial support provided by the Employer.

This conclusion takes into account my understanding that the Employer understands the possible variability in future contributions associated with the current investment policy. If the Employer has a different view, then this policy should be reviewed.

#### Assets backing accumulation benefit liabilities

The Plan provides members with a range of investment options for their accumulation benefits (including the additional account balances of defined benefit members). The assets supporting the Plan's accumulation benefit liabilities are invested according to members' selected investment options and the actual returns on those investments (whether positive or negative) are passed on to members via changes in the unit prices by which member account balances are determined. Thus the Plan's accumulation liabilities and related assets are fully matched.

The Plan's investments are expected to provide a high level of liquidity in normal circumstances.

I consider that the Plan's investment policy for assets relating to accumulation liabilities is suitable, having regard to the nature and term of these liabilities.

# **Crediting Rate Policy**

#### **Defined Benefits**

The main features of the crediting rate policy in relation to defined benefits are summarised briefly below:

- The annual crediting rate is calculated as the internal rate of return, net of tax and fees (based on the starting and ending asset values and cash flows over the year to 30 June) and applied at the year end to the value of the member account balance at the previous 30 June and any contributions made during the year allowing for the timing of contributions. The interim crediting rate (see below) will be used until the annual crediting rate is determined.
- The interim crediting rate is calculated monthly as the internal rate of return (based on the starting and ending asset values and cash flows over the period from 30 June to the end of the relevant month). The interim crediting rate is used to determine benefit quotes and to determine a benefit when a member exits the Plan up to the date the benefit is processed. The Trustee may, at its discretion, apply a different interim crediting rate from the date the member leaves the Plan until the member's benefit payment is made.
- Crediting rates may be adjusted to ensure that member accounts do not exceed Plan assets and are consistent with any policy covering reserves.
- Where required, the annual and interim crediting rates are increased by a percentage agreed with the Actuary and the employer to reflect asset fee rebates to be passed on to members' benefits.

#### **Accumulation Benefits**

The main features of the unit pricing and crediting rate policy in relation to accumulation member accounts and to the additional accumulation accounts of defined benefit members are summarised briefly below:

- Earnings credited to the accounts are based on the actual net earning rates (i.e. earnings net of investment costs, asset-based administration fees and provisions for tax) of the members' selected investment options. Net earnings are allocated via changes in unit prices. Unit prices are determined on a daily basis. Rules relating to the prices at which units are bought and sold are designed to prevent selection against the Plan by members.
- No investment reserves are held. Net investment earnings are fully passed on to member accounts via unit prices.

#### **Documentation**

The Plan's crediting and unit pricing policies and related procedures are set out in a policy document dated September 2019 and May 2018 respectively.

#### Conclusion

The crediting and unit pricing policy and related procedures are documented. A detailed review of the policy and related procedures is outside the scope of this investigation.

Based on a review of the main features, we consider that the unit pricing and crediting rate policy adopted for these benefits is generally suitable taking into consideration the principles of equity between different generations of members and any material risks which may have a significant impact on the Plan (i.e. a market shock or sudden downturn in investment markets).

# **The Actuarial Approach**

# **Financing Objective**

The financing objective adopted for this investigation is to maintain the value of the Plan's assets at least equal to:

- 100% of accumulation account balances plus
- 105% of Vested Benefits (Early Retirement from age 55) for defined members over the period to the next investigation

Accumulation account balances are matched by specific assets and do not require any additional margins. However 56% of the Plan's defined benefit liabilities are not linked to the returns on the underlying assets. A margin in excess of 100% coverage of vested defined benefits is therefore desirable to provide some security against adverse experience such as poor investment returns

The setting of the financial objective to 105% of Vested Benefits (Early Retirement from age 55) was previously made in recognition of the defined member age profile and the experience that the Employer has historically used its discretion to provide consent to early retirement.

Based on the assumptions adopted for this investigation, achieving the financing objective of 105% of Vested Benefits (Early Retirement from age 55) for defined benefit members would also result in at least 100% coverage of the Actuarial Value of Accrued Benefits and a satisfactory margin of coverage over 100% of SG Minimum Benefits. Hence, it is not considered necessary to adopt specific financing objectives in relation to these benefit liability measures.

I have taken into consideration the provisions of the Trust Deed and any professional requirements as set out below.

#### **Professional Requirements**

Under Professional Standard 400 issued by the Actuaries Institute, the funding method selected by the actuary *"must aim to provide that:* 

- (a) members' benefit entitlements (including any pension increases provided by the Trust Deed or in accordance with either precedent or the intentions of the Trustee and/or Plan Sponsor) are fully funded before the members retire; and
- (b) the assets of the Plan from time to time, after making full provision for the entitlements of any beneficiaries or members who have ceased to be employed, exceed the aggregate of benefits which employed members would reasonably expect to be payable to them on termination of

membership, including the expenses of paying those benefits, and having regard to the provisions of the Trust Deed and the likely exercise of any Options or Discretions." (Paragraph 5.5.4 of PS400).

Accordingly the actuary needs to be satisfied that any funding program is expected to provide a level of assets which meets or exceeds immediate benefit entitlements based on members' reasonable expectations. Should assets fall below that level, the funding program needs to aim to lift assets to at least the required level over a reasonable time period and to maintain assets at or above the required level thereafter.

The financing objective has been set on the basis that members' reasonable expectations on termination would be to receive their vested benefit (Early Retirement from age 55) entitlement.

#### **Provisions of the Trust Deed**

IOOF Employer Super's Trust Deed includes a requirement that an actuary carry out an actuarial valuation of the financial condition of the Plan in accordance with relevant Commonwealth superannuation legislation.

### **Financing Method**

There are various financing methods that could be followed in setting the Employer contribution level. This investigation uses the "Attained Age Normal" method.

Under this method, the "normal cost" is the estimated level rate of Employer contributions required to provide benefits in respect of future service (i.e. service after the investigation date) for existing members. The normal cost ignores any surplus or deficiency of assets over accrued liabilities. The recommended Employer contribution rate may then be set above or below the normal cost for a suitable period of time to amortise any surplus/deficiency and to take into account the Plan's financing objectives.

Under this method of financing, the level of the Employer contributions may vary from time to time to ensure that the Plan remains on course towards its financing objectives.

It is noted that, as the defined benefits are closed to new members and (on the assumptions adopted) the cost of future service benefits increases with age, the normal cost is expected to gradually increase as the defined benefit membership ages.

We consider that the Attained Age Normal method is suitable in the Plan's current circumstances as the normal cost reflects the expected (on the assumptions adopted) employer cost of future service benefits and the recommended contribution rate can be varied around the normal cost to take into account the projected financial position as compared with the financing objective.

#### **Changes in Financing Method**

The Attained Age Normal method was used at the previous investigation.

# **Financial Position of the Plan**

# **Funding Status**

#### **Vested Benefits**

Vested Benefits are the amounts payable as of right should all active members voluntarily resign or, if eligible, retire at the investigation date.

Two measures of Vested Benefits have been calculated, to illustrate the impact of allowing for Employer consent to early retirement benefits from age 55, compared to the position where early retirement benefits are payable as a right from age 60. This is consistent with the approach adopted in the previous valuation.

At 30 June 2020, the Plan assets represented 134.1% of the vested benefits (Early Retirement from age 55) and 156.7% of the vested benefits (Early Retirement as a right from age 60) hence the Plan was considered to be in a "satisfactory financial position" under SIS legislation. The 134.1% coverage of the Defined Benefit Vested Benefits (Early Retirement from age 55) was above the financing objective of 105% coverage adopted for this investigation.

#### **SG Minimum Benefits**

SG Minimum Benefits are the minimum benefits required under SG legislation, as defined in the Benefit Certificate (also referred to as Minimum Requisite Benefits or MRBs).

The Plan assets at 30 June 2020 were 235.3% of defined benefit MRBs and hence the Plan was considered to be "solvent" under SIS legislation.

#### **Actuarial Value of Accrued Benefits**

The Actuarial Value of Accrued Benefits is the expected value (as at the investigation date) of all future expected benefit payments, based on membership to date, discounted to the investigation date, taking into account the probability of payment. This value is calculated using the actuarial assumptions. In determining the value, we have not applied a minimum of the vested benefits. Further details concerning the calculation of the Actuarial Value of Accrued Benefits are set out in Appendix C.

The Plan Assets as 30 June 2020 represented 138.7% of the Actuarial Value of Accrued Defined Benefits.

#### The following table shows these funding measures at both the previous and current valuation dates.

	Position at 3	Position at 30 June 2020		Position from 30 June 2017 Investigation Report	
Defined Benefits Only*	\$000	Asset Coverage	Projected Coverage at 30 June 2020	Coverage at 30 June 2017	
Assets					
Liability for Vested Benefits (Early retirement as a right from age 60)		156.7%	117%	135.5%	
Liability for Vested Benefits (Early retirement from age 55)		134.1%	108%	108.8%	
Liability for Actuarial Value of Accrued Benefits		138.7%	n/a	110.8%	
Liability for SG Minimum Benefits		235.3%	n/a	210.6%	

\* The above totals exclude \$169,000 of additional accumulation balances for defined benefit members, a accumulation members as at 30 June 2020.

The coverage levels at 30 June 2020 were higher than the levels at the previous actuarial investigation, due to the overall positive experience discussed in Section 3.

### **Employer Future Service Cost**

Based on the assumptions adopted for this investigation, we estimate that the Employer's long-term funding costs (i.e. the normal cost of funding future service defined benefit accruals for each category) are as follows:

Defined Benefit Membership Group	Employer long-term cost (of future benefit accrual) (% of Salary/Wage)
Category C	17.1%
Category D	15.2%
Category E	14.5%

An average rate for current members is 15.7% of salaries. This rate excludes the 5.9% deemed contributions for Category B, C and D members.

The Employer's long-term defined benefit funding cost above includes the expected insurance premiums of 3.2% of DB salaries and allowance for contributions tax, but excludes expected consulting and other fees.

The assessed long-term costs for future service have decreased by 0.6% of salaries since the last investigation, due to the death of the last remaining member of Category B (the long-term cost of which was higher than the other categories), partially offset by the change in financial assumptions.

## **Previous Recommendations**

The Employer contribution rates over the three year review period, in accordance with the prior actuarial investigation were as follows:

- Defined Benefit members:
  - 15 % of salaries for all defined benefit members until 31 December 2017 and 7% thereafter, plus
  - An additional 5.9% of deemed member contributions for Category B,C and D members, plus
  - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).
- Accumulation members:
  - At the required rate (currently 9.5% of Ordinary Time Earnings) or such lesser amount as required to meet the Employer's obligations under Superannuation Guarantee legislation or employment agreements, plus
  - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).

# **Recommended Contributions**

Based on the Trustee's financing objective described and the results of this investigation, I recommended that Employer contributes as follows:

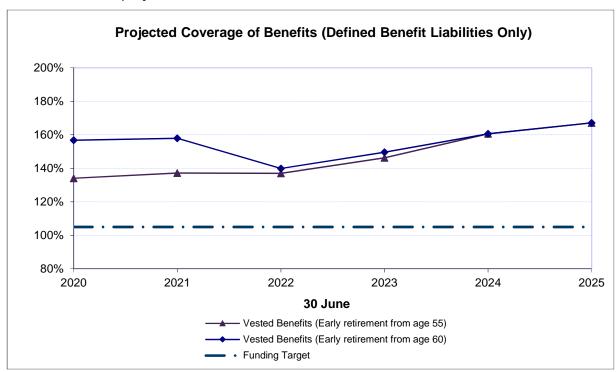
- Defined Benefit members:
  - 7% of salaries for all defined benefit members until 31 December 2020 and nil thereafter, plus
  - An additional 5.9% of deemed member contributions for Category B,C and D members, plus
  - An additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).
- Accumulation members:
  - At the required rate (currently 9.5% of Ordinary Time Earnings) or such lesser amount as required to meet the Employer's obligations under Superannuation Guarantee legislation or employment agreements, plus
  - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).

This recommended program represents a decrease from current contributions primarily due to the Plan's experience discussed above.

In practice, it is likely to be necessary to vary the Employer contributions at some point in the future to achieve the Trustee's financing objective.

## **Projected Financial Position**

I have prepared a projection of Plan assets and benefit liabilities based on the actuarial assumptions adopted for this investigation; and assuming the recommended Employer contributions will be paid.



The results of the projection are as follows:

The Trustee should note that this projection is based on the assumptions adopted, which represent a single scenario from the range of possibilities. The future is uncertain and the Plan's actual experience will differ from those assumptions; these differences may be minor in their overall effect, or they may be significant and material. In addition, different sets of assumptions or scenarios may also be within the reasonable range and results based on those alternative assumptions would be different, as discussed below.

The projection above shows that the recommended contributions are anticipated to result in assets of at least 105% of Defined Benefit Vested Benefits (Early Retirement from age 55), which represents the financing objective adopted in this investigation, over the period to 30 June 2023. The graph also shows the coverage level of assets compared with the Vested Benefits (Early Retirement as a right from age 60) is expected to remain above 100%. The Plan is therefore projected to be in a satisfactory financial position over the period to 30 June 2023.

We have not prepared a graph to show the coverage of assets compared with the Actuarial Value of Accrued Benefits. However, given the relationship between Vested Benefits and the Actuarial Value of Accrued Benefits at the investigation date and the projected level of asset coverage at 30 June 2023, I am of the opinion that the recommended contributions are projected to result in asset coverage of 100% of the Actuarial Value of Accrued Benefits over the period to 30 June 2023.

# **Sensitivity Analysis**

We have tested the effect of changes to the key assumptions on the value of liabilities and the Plan's net financial position.

The liabilities shown in this report have been calculated using our best estimate assumptions for investment return (3.0% per annum) and salary growth (2.0% per annum). As both future investment returns and future salary increases are unknown, it is almost certain that actual experience will differ from these assumptions.

It is the difference between the investment return rate and salary growth rate (commonly referred to as the 'gap') that is crucial rather than the individual assumptions, because the value of the assets move with investment returns while most of the defined benefit liabilities grow with salaries.

To quantify the sensitivity of the excess of Plan assets over the Actuarial Value of Accrued Benefits (the net financial position) to our assumptions, we have calculated the change in liability based on the following scenarios:

- Decrease the long term investment return assumption by 1% pa;
- Increase the salary growth assumption by 1% pa;

All other assumptions, including the Employer Contribution rates, are assumed to remaining the same.

The effects of these changes are shown below:

Scenario	Net financial position as at 30 June 2020 (\$million)	Change in net financial position (\$million)
Base assumptions as shown previously		
Decrease investment return by 1% pa		
Increase salary increase by 1% pa		

# **Key Risks**

## **Investment Volatility**

Approximately 56% of the current vested benefits for defined benefit members are linked to salaries and not linked to investment returns. Therefore the Plan's vested benefits coverage is sensitive to changes in the investment returns.

I have considered the impact of investment volatility on the Plan's financial position over the next few years using a "high return" and a "low return" scenario. The returns under both scenarios have been derived from assumptions about the likely risk attached to the Plan's defined benefit investment strategy.

Using the investment return model and assumptions adopted, there is approximately a 10% chance of the Plan's cumulative investment return being less than the "low return" scenario over the next 4 years. Similarly, there is approximately only a 10% chance of the Plan's cumulative investment return being greater than the "high return" scenario over the next 4 years.

The cumulative investment returns as at 30 June 2024 under the "low return" and "high return" scenarios are -2.2% and 25.6% respectively (equivalent to -0.6% and 5.9% pa respectively).

Based on fluctuations in investment returns only, and assuming other experience is in line with the assumptions adopted for this investigation, there is approximately an 80% chance that the coverage of assets over Vested Benefits (early retirement from age 55) at 30 June 2024 will fall in the range from 92% to 186%.

Please note that the "low return" scenario and the "high return" scenario shown above are illustrations only, and show what may occur under assumed future experiences that differ from our baseline assumptions. These scenarios do not constitute upper or lower bounds and the actual future coverage of Vested Benefits may differ significantly from the range shown above, depending on actual future experience. In fact, there is a 1 in 20 chance that the investment return could be less than minus 9.4% in any year based on the current Plan asset allocation.

In my view, the Trustee should be satisfied with the expected level of security.

### **Salary Growth Risk**

The risk is that wages or salaries (on which future benefit amounts will be based) will rise more rapidly than assumed, increasing benefit amounts and thereby requiring additional employer contributions. This risk is borne by the Employer.

For example, if the assumed future salary increase rate was increased by 1% pa with no change in other assumptions, then the Plan's net financial position would deteriorate by from an excess of o an excess of \$ as shown in the table in Section 7.

The actual rate of future salary increases may vary (positively or negatively) from the rate assumed at this investigation by much more than the (positive) 1% pa illustrated in the example above.

# **Legislative Risk**

This risk is that the Commonwealth Government could make legislative changes that increase the cost of providing the defined benefits – for example, an increase in the rate of tax on superannuation funds. This risk is borne by the Employer and is a real risk in the post COVID-19 environment.

# **COVID-19 Risks**

The COVID-19 pandemic had a significant impact on investment markets in the quarter ending 31 March 2020, which is reflected in the value of Plan assets used in assessing the Plan's financial position at the investigation date. It is not clear what, if any, impact COVID-19 will have in the medium to long term. We have therefore not made any specific allowance for the future impact of COVID-19 in the investigation, but any impact on investment markets and the Plan's financial position will continue to be monitored over the period to the next investigation.

# **Small Plan Risk**

This risk relates to supporting a defined benefit plan where there are few remaining defined benefit members meaning the law of averages no longer applies and the time horizon of the defined benefit liabilities may have become short. Issues that may require consideration include:

- (i) Funding may have previously been based on the Defined Benefit Plan continuing in the longer-term, which may no longer hold. Therefore greater focus is required on the funding of benefits immediately payable to members (e.g. Defined Benefit Vested Benefits);
- (ii) With few remaining members, the experience of a single member or event will have a proportionately larger impact on the financial position. Therefore more frequent monitoring of the financial position will be required;
- (iii) Contributions required to finance any shortfalls, specifically as a percentage of salary roll of defined benefit members, can become significant;
- (iv) The investment strategy may have been set based on the Defined Benefit liabilities continuing in the longer-term, which may no longer hold. Therefore the strategy may need to be revised to reflect the shorter term of the liabilities;
- (v) Fees in respect of the Plan, particularly relative to the number of defined benefit members and salary roll, can become significant. Most actuarial tasks are essentially the same whether there are one or 100 defined benefit members. As defined benefit funds reduce in membership, the actuarial fees may, in fact, increase because of additional monitoring being required. Industry changes such as the SG rate increase can also result in additional fees; and
- (vi) The expected wind-down of the remaining defined benefit members.

The Plan's Risk Management Statement and Risk Management Plan should identify a full range of risks faced by the Trustee.

# **Insurance and Related Risks**

#### Insurance

The Plan is not permitted to self-insure.

For accumulation members, death and lump sum total and permanent disablement (TPD) insurance cover in excess of total account balances are fully insured.

The "Group Life Insurance" covers risks of death and TPD.

For defined members, the group life sum insured formula currently in use is:

Death Benefit less (Salary X Accrued Retirement Multiple/1.02^(65-age attained))

The total amount insured should cover the excess of the death/TPD benefits over the Plan's assets, unless there is a funding shortfall. Based on the formula in use at the investigation date, the coverage of death/TPD risk as at 30 June 2020 for the Plan was as follows.

	Defined Benefit members	\$000
	Death/Disablement Benefits	
less	Sum Insured	
less	Assets	
	Uncovered Death/Disablement Benefits	

The formula has resulted in insurance being more than sufficient to provide full protection due to the Plan's strong financial position.

In theory, the Trustee could consider changing the sum insured formula with a view to reducing the degree of over-insurance and the associated premiums. However, there are a number of practical difficulties with such a change. These include:

- navigating the regulatory environment relating to self-insurance and insurance management frameworks;
- accommodating movement in the levels of surplus; and
- the cost of implementing the insurance changes, which could potentially outweigh the premium savings.

For temporary disability benefits, the benefit provisions are insured. Where the benefits are entirely matched by the insurance policy, there is no funding gap and any claims or adverse experience will have no immediate financial impact on the Plan.

In my opinion, the current group life insurance arrangements, including the sum insured formula for defined benefit members, are appropriate and provide adequate protection for the Plan.

#### **Documentation**

The death, TPD and temporary disability insurance arrangements are underwritten by TAL Life Limited ("the insurer") and outlined in a Group Life Policy and a Group Salary Continuance Policy, both amended with effect from 1 July 2020, between the Trustee and the insurer. The purpose of the insurance policy is to protect the Plan against unexpectedly large payouts on the death or disablement of members.

# **Prudential Standards**

The prudential regulator (APRA) has issued a number of Prudential Standards for the superannuation industry, including Prudential Standard (SPS 160) relating to the financial management and funding of defined benefit plans. We have commented below on several requirements arising from SPS 160.

# **Shortfall Limit**

The Trustee must determine a "Shortfall Limit" for each fund, being:

"the extent to which the fund can be in an unsatisfactory financial position with the Trustee still being able to reasonably expect that, because of corrections to temporary negative market fluctuations in the value of the fund assets, the fund can be restored to a satisfactory financial position within a year".

We understand that the Plan's Shortfall Limit, determined by the Trustee on the basis of previous actuarial advice, is 99.0%.

The Shortfall Limit is expressed as the coverage level of the defined benefit vested benefits (Early Retirement as a right from age 60) by the defined benefit assets. It is appropriate to consider the following factors when determining if the Shortfall Limit remains appropriate:

- The guidance provided in the relevant Actuaries Institute Information Note: Shortfall Limit in Prudential Standard 160 dated June 2013;
- The investment strategy for defined benefit assets, particularly the overall benchmark exposure of 49% to "growth" assets;
- The results of this investigation regarding the extent to which the current and projected defined benefit Vested Benefits are not linked to the investment return on defined benefit assets (i.e. salary-based benefits) and the current and projected relativity between Vested Benefits and Minimum Requisite Benefits.

Based on the above, we recommend maintaining the current Shortfall Limit at 99.0%.

The projections also indicate that the level of Minimum Requisite Benefits is not expected to be a constraint in determining the Shortfall Limit. We will reassess the suitability of the adopted Shortfall Limit as part of the next regular actuarial investigation. The Shortfall Limit should be reviewed earlier if there is a significant change to the investment strategy for defined benefit assets – in particular a change to a more defensive strategy which has a benchmark allocation to "growth" assets of less than 35% - or if the Trustee otherwise considers it appropriate to do so.

### **Monitoring Process**

SPS 160 also requires the Trustee to determine and implement a process for monitoring the defined benefit Vested Benefits coverage against the Shortfall Limit for each plan. If this monitoring process indicates that the vested benefits coverage has (or may have) fallen below the Shortfall Limit, then under SPS 160:

- An "Interim Actuarial Investigation" may be required (depending on the timing of the next regular actuarial investigation).
- A Restoration Plan is required to be put in place if an Interim Actuarial Investigation finds the plan has breached its Shortfall Limit. The Restoration Plan must be designed to return the plan to a "satisfactory financial position", so that the Vested Benefits are fully covered, within a reasonable period that must not exceed 3 years and this must be submitted to APRA.

We recommend that the Trustee continues its regular monitoring process to review the progress of the Plan's coverage of vested benefits to ascertain if an adjustment to the Employer contribution levels is required prior to the next complete investigation.

We also recommend a formal review by the actuary of the progress of the Plan's coverage of vested benefits to monitor the impact of the reduction in contributions. The next review could occur at 30 June 2021.

The Trustee should also continue to monitor the "Notifiable Events" specified in the Plan's Funding and Solvency Certificate and advise the Actuary should any actual or potential Notifiable Events occur.

### **Requirements due to Unsatisfactory Financial Position**

#### **Restoration Plan**

Under SPS 160, a Restoration Plan is also required to be put in place if the actuary finds in a regular Actuarial Investigation that a plan:

- Is in an unsatisfactory financial position (whether or not the Shortfall Limit has been breached); or
- Is likely to fall into an unsatisfactory financial position.

The Restoration Plan must be designed to return the plan to a "satisfactory financial position", so that Vested Benefits are fully covered, within a reasonable period that must not exceed 3 years from the investigation date.

An SPS 160 Restoration Plan is not required if the plan is technically insolvent (in which case the insolvency rules must be followed). If an SPS 160 Restoration Plan is already in place then any changes to the contribution program (including its period) must be made within the framework of that Restoration Plan.

As indicated by the financial position and the projections, we consider that:

- The Plan is not in an unsatisfactory financial position; and
- The Plan is not likely to fall into an unsatisfactory financial position

Hence the special requirements of SPS 160 for funds in an unsatisfactory financial position do not apply at this investigation.

# **Actuary's Reporting Requirements**

Section 130 of the SIS Act requires that if an actuary forms the opinion that a plan's financial position may be unsatisfactory, or may be about to become unsatisfactory, and that opinion was formed in performing an actuarial function, the actuary must advise both the Trustee and the prudential regulator (APRA) in writing immediately. Note: an unsatisfactory financial position applies where assets are less than Vested Benefits.

These requirements do not currently apply as I am of the opinion that the Plan's financial position is not unsatisfactory (or about to become unsatisfactory).

The Plan's assets are sufficient to fully cover the SG Minimum Benefits at 30 June 2020. Therefore the Plan is not considered to be technically insolvent.

## **Statements Required by SPS 160**

This section provides statements required to be made under APRA Prudential Standard SPS 160. Values cited relate to the Plan as a whole (inclusive of all accumulation members and accounts).

- (a) The value of the Plan's assets as at 30 June 2020 w This value excludes assets held to meet the Operational Risk Financial Requirement.
- (b) In my opinion, the value of the liabilities of the Plan in respect of accrued benefits as at 30 June 2020 was \$42,474,000. Hence we consider that the value of the assets at 30 June 2020 is adequate to meet the value of the accrued benefit liabilities of the Plan as at 30 June 2020. Taking into account the circumstances of the Plan, the details of the membership and the assets, the benefit structure of the Plan and the industry within which the Employer operates, I consider that the assumptions and valuation methodology used are appropriate in relation to the determination of the accrued benefit liabilities for the purposes of this report. Further comments on the assumptions and valuation methodology are set out in Sections 4 and 6 of this report. Assuming that the Employer contributes in accordance with my recommendations based on the assumptions used for this actuarial investigation, we expect that assets will remain sufficient to cover the value of accrued benefit liabilities over the period to 30 June 2023.
- (c) In my opinion, the value of the liabilities of the Plan in respect of Vested Benefits (Early retirement as a right from age 60) as at 30 June 2020 was \$ Hence, we consider that the value of the assets at 30 June 2020 is adequate to meet the value of the vested benefit liabilities of the Plan as at 30 June 2020. Assuming that the Employer contributes in accordance with my recommendations based on the assumptions made for this actuarial investigation, we

expect that assets will remain sufficient to cover the value of vested benefit liabilities over the period to 30 June 2023. Hence I consider that the financial position of the Plan should be treated as satisfactory as defined in SPS 160.

- (d) In my opinion, the value of the liabilities of the Plan in respect of the minimum benefits of the members of the Plan as at 30 June 2020 was Hence the Plan was not technically insolvent at 30 June 2020.
- (e) A projection of the likely future financial position of the Plan over the 3-year period following 30 June 2020, based on what I consider to be reasonable expectations for the Plan for the purpose of this projection, is set out in Section 7 of this report,
- (f) Based on the results of this investigation, we consider that the Shortfall Limit remains 99.0% appropriate. Comments are set out earlier in this section.
- (g) In respect of the 3-year period following 30 June 2020, we recommend that the Employer contribute to the Plan at least:
  - Defined Benefit members:
    - 7% of salaries for all defined benefit members until 31 December 2020 and nil thereafter,
    - plus
      An additional 5.9% of deemed member contributions for Category B,C and D members, plus
    - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).
  - Accumulation members:
    - At the required rate (currently 9.5% of Ordinary Time Earnings) or such lesser amount as required to meet the Employer's obligations under Superannuation Guarantee legislation or employment agreements, plus
    - Any additional employer contributions agreed between the Employer and a member (e.g. additional salary sacrifice contributions).
- (h) The Plan is used for Superannuation Guarantee purposes:
  - all Funding and Solvency Certificates required under Division 9.3 of the SIS Regulations have been issued for the period from the date of the last investigation to 30 June 2020;
  - I expect to be able to certify the solvency of the Plan in any Funding and Solvency Certificates that may be required in the three year period from 30 June 2020.

# **Actuarial Certification**

## **Actuary's Certifications**

#### **Professional standards and scope**

This report has been prepared in accordance with generally accepted actuarial principles, Mercer's internal standards, and the relevant Professional Standards of the Actuaries Institute, in particular PS400 which applies to "...actuarial investigations of the financial condition of wholly or partially funded defined benefit superannuation funds."

#### **Use of report**

This investigation report should not be relied upon for any other purpose or by any party other than the Trustee of the Plan and the Employer(s) who contribute to the Plan. Mercer is not responsible for the consequences of any other use. This report should be considered in its entirety and not distributed in parts. The Trustee should share this report with the Employer(s) who contribute(s) to the Plan. The Employer(s) may consider obtaining separate actuarial advice on the recommendations contained in the report.

The advice contained in this report is given in the context of Australian law and practice. No allowance has been made for taxation, accountancy or other requirements in any other country.

#### **Actuarial Uncertainty and Assumptions**

An actuarial investigation report contains a snapshot of a Plan's financial condition at a particular point in time, and projections of the Plan's estimated future financial position based on certain assumptions. It does not provide certainty in relation to a Plan's future financial condition or its ability to pay benefits in the future.

Future funding and actual costs relating to the Plan are primarily driven by the Plan's benefit design, the actual investment returns, the actual rate of salary growth and any discretions exercised by the Trustee or the Employer. The Plan's actuary does not directly control or influence any of these factors in the context of an actuarial investigation.

The Plan's future financial position and the recommended Employer contributions depend on a number of factors, including the amount of benefits the Plan pays, the cause and timing of member withdrawals, plan expense, the level of taxation and the amount earned on any assets invested to pay the benefits. These amounts and others are uncertain and unknowable at the investigation date, but are predicted to fall within a reasonable range of possibilities.

To prepare this report, assumptions are used to select a single scenario from the range of possibilities. The results of that single scenario are included in this report. However, the future is uncertain and the Plan's actual experience will differ from those assumptions; these differences may be significant or material. In addition, different assumptions or scenarios may also be within the reasonable range and results based on those assumptions would be different. For this reason, this report shows the impact on the Plan's financial position if alternative assumptions were to be adopted.

Actuarial assumptions may also be changed from one investigation to the next because of mandated requirements, Plan experience, changes in expectations about the future and other factors. We did not perform, and thus do not present, an analysis of the potential range of all future possibilities and scenarios.

Because actual Plan experience will differ from the assumptions, decisions about benefit changes, investment policy, funding amounts and benefit related issues should only be made after careful consideration of possible future financial conditions and scenarios, and not solely on the basis of a set of investigation results.

## **Additional Information**

The next **actuarial investigation** is required at a date no later than 30 June 2023. At that time, the adequacy of the Employer contribution levels will be reassessed. Note that the monitoring process recommended may lead to an earlier reassessment ahead of the next full actuarial investigation.

The next **Funding and Solvency Certificate** is required at least 12 months before the expiry of the current Special Funding and Solvency Certificate (which expires on 30 June 2022).

The next **Benefit Certificate** is required following the expiry of the current Benefit Certificate (which expires 30 June 2023). The current Benefit Certificate is designed to accommodate changes to the legislated Superannuation Guarantee schedule.

## **Further Information**

Please contact me to provide any supplementary information or explanations about this actuarial investigation as may be required.

Markl. Nelson

Mark Nelson Fellow of the Institute of Actuaries of Australia

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4 December 2020

I have reviewed this report under Mercer's professional Peer Review Policy. I am satisfied that it complies with the applicable professional standards and uses assumptions and methods that are suitable for the purpose.

George B

Mark Samuels Fellow of the Institute of Actuaries of Australia

# Appendix A

# **Plan Design**

## **Summary of Benefits**

A summary of the main benefit provisions in respect of defined benefit members is set out below. Reference should be made to the formal governing documents for definitive statements.

Membership	The following 8 categories are used for administrative purposes (and in
Categories	the summary of benefits given below):
	Defined Benefit Section
	B: Senior Executives C: Senior Management
	D: Special Salaried Staff
	E: Salaried/Full-time Award Staff
	Accumulation Section
	AFG: Directors, Non Contributory Staff & Award Casual Employees H: New permanent employees and transferring members who have transferred to this Category from 1 April 2001 I: New Directors and Award Casuals employees from 1 April 2001
	J: Spouses
Spouse Members (Category J)	Spouses of Plan members may join the Plan. The benefits provided to spouse members is equal to the accumulation of their own contributions less tax (if any) and charges with interest based on the investment options chosen by the member.
Accumulation Members (Categories A, F, G, H, I)	Accumulation members are entitled to an accumulation benefit of contributions paid less tax and charges plus interest on any mode of exit.
Defined Benefit Members (Categories B, C, D, E)	The remaining benefits relates to Defined Benefit members of the Plan.

Accumulation Credit	are entitled to an accu credit includes any ad member and any amo Accumulation Credit i In addition, any Super	efits described below, Def umulation benefit of the A Iditional contributions ma punts the member rolls into s payable on any mode of rannuation Surcharge paic fulated with interest and d he time of payment.	ccumulation Credit. This de by the Employer or o the Plan. The exit. I by the Plan in respect
Member Account and Contributions	Employer Basic Account (EBA) - Contributions credited to the EBA will be at the minimum rate as determined by the Superannuation Guarantee (Administration) Act 1992, plus the 5.9% member contributions (deemed contributions for Categories B, C and D). Employer Additional Account (EAA) – Contributions credited to the EAA will be at the difference between the applicable rate in the following table and the minimum rate as determined by the Superannuation Guarantee (Administration) Act 1992 (now 9.5%).		
	Category B C D	Applicable Rate (%) 12.0 10.5 9.5	Resulting Current Rate (%) 2.5 1.0 Nil
	E	9.0	Nil
Normal Retirement Date	The 65 <sup>th</sup> birthday of th	ne Member.	
Prior Membership (PM)	Membership of the Pl full month) prior to 1 .	an in years and months (p. July 1993.	art months counted as a
Future Membership (FM)	The period of membership in years and complete months from the later of 1 July 1993 and the Member's date for Benefits to the date of exiting the Plan.		
Accrued Retirement Multiple (ARM)	A Member's Accrued Retirement Multiple (for membership prior to 1 July 1993) is calculated as the Member's normal retirement multiple under the benefit design which applied to Transferring Members prior to 1 July 1993 reduced by 12.5% for each year of potential membership (with months counting proportionally) from 1 July 1993 to the Member's Normal Retirement Date.		
Final Average Plan Salary (FAPS)	The average of a Member's Plan Salary (PS) at the last 3 Annual Review Dates.		
Final Average Package Amount (FAPA)	The average of a Mem Review Dates.	nber's Package Amount (P/	A) at the last 3 Annual
Normal Retirement Benefit	The Benefit payable on the Normal Retirement Date is a lump sum equal to: ARM x FAPS + P% x FM x FAPA where P is as follows:		

	I			
	Category	Р		
	В	20.0		
	С	17.5		
	D	16.0		
	E	16.0		
	The Normal Retirement Benefit will Benefit.	not be less than the Resignation		
Early Retirement Benefit	A member can retire from age 60 (ag and receive a lump sum Benefit equa			
	ARM x FAPS + P	ARM x FAPS + P% x FM x FAPA		
	where P is as tabulated above			
	The Early Retirement Benefit will not	t he less than the Resignation		
	Benefit.	the less than the kesignation		
Death and Total and	These Benefits are equal to the Norn			
Permanent Disablement	by replacing "Final Average Plan Salary" by "Plan Salary" and "Final			
	Average Package Amount" by "Pack			
	exist for some Members. The Benefit	t will be increased by any		
	voluntarily insured amount.			
	Neither the Death Benefit nor the To	tal and Permanent Disablement		
	Benefit will be less than the Resigna	tion Benefit.		
	The benefit may be adjusted in circu unable to obtain the full intended le			
	member.			
Resignation	A Member's Resignation Benefit will	be determined as:		
	(5% x Plan Salary x Membership to 1 July 1993) x (1 + VFO) plus EBA EAA x VF			
	where VFO is			
	Complete Years of Category B, C, D or E Membership	VFO		
	0 - 4	Nil		
	5	25%		
	More than 5	25% plus 5% for each complete		
		year in excess of 5, to a maximum of 100%		
	And			
	where VF is 10% for each complete y Membership, with a maximum of 10			
	<b>PROVIDED THAT</b> in respect of a Mer or her 55th birthday:	nber who ceases Service prior to his		

	(a) on account of ill health which in the opinion of the Trustee has severely reduced his or her earning capacity in employment; or
	The Trustee may in its absolute discretion apply higher values for VFO and VF, each up to a maximum of 100%
	<b>FURTHER PROVIDED THAT</b> for Category E Members who were Members of this Category as at 7 April 1996, the Resignation Benefit shall be no less than the Resignation Benefit which would have been payable under the Rules of this Category in force as at 7 April 1996. This minimum is determined as:
	(5% x Plan Salary x Membership to 1 July 1993) x (1 + VFO) plus Member Contribution Account x (2 + 10% for each complete year of membership in excess of 2).
Temporary Disability Benefit	A Salary Continuance Benefit of 75% of the Plan Salary is payable on total but temporary disablement after 30 days, for a period of up to 2 years (subject to any insurance limits that may apply).
Employer Contributions	The Employer contributes the balance needed to meet the cost of the defined benefits.
	Employer contributions are not allocated to individual members but are applied as required to provide benefits.
Superannuation Surcharge	The surcharge commenced with effect from 20 August 1996 and is essentially an additional tax on high income earners calculated and collected via superannuation funds. The surcharge has been abolished from 1 July 2005.
	The determination of surcharge is partially dependent on information the Australian Taxation Office receives from individuals. Therefore, it is possible that some surcharge payments will continue to be required over the next few years in respect of years prior to 1 July 2005.
	The accumulated amount of all Surcharge Assessments paid by the Plan (accumulated with investment earnings forgone by the Plan) is deducted from the benefit payable to or on behalf of a member.

#### Discretions

The table below indicates the material discretions available to the Trustee and Employer and the member options specified within the Plan's legal documents, to the extent that these affect benefits. The table also shows the general prevalence of the past exercise of discretions and the options chosen by the members.

Please note that past exercises of discretions should not be viewed as precedents which would constrain any future decisions.

Trustee and Employer	
Description and Deed Reference	Historical Prevalence
Employer discretion of providing consent for Early	Employer discretion has been made in the past
Retirement between ages 55 to 60	

Neither the Trustee nor the Employer has a right within the Trust Deed to review benefits or member contribution rates.

#### **Minimum Benefit**

Benefits on leaving service for any reason are subject to a minimum Superannuation Guarantee benefit described in the Plan's Benefit Certificate

### The Superannuation Guarantee (Administration) Act 1992

This Act requires employers to provide minimum superannuation benefits that are fully vested in their employees within a complying superannuation fund.

The contribution rates recommended in this report and the projected financial positions allow for benefits being augmented as necessary to meet the minimum Superannuation Guarantee (SG) benefit described in the Plan's current Benefit Certificate, which is based on the current legislated SG rate of 9.5%.

Under current legislation the SG rate will be 9.5% until 1 July 2021 and it will then increase by 0.5% pa until it reaches 12% from 1 July 2025.

# Appendix B

# **Data and Decrement assumptions**

# **Data Provisions**

To prepare this report, we have relied on financial and participant data provided by the Plan's administrator. The data used is summarised in this report. We have not independently verified or audited the data provided but have performed a range of broad "reasonableness" checks and tested for consistency with previous records. We are satisfied that the data is sufficiently accurate for the purposes of this actuarial investigation.

We have also relied upon the documents, including amendments, governing the Plan as provided by the Trustee. The Trustee is ultimately responsible for the validity, accuracy and comprehensiveness of this information. If the data or Plan provisions are not accurate and complete, the investigation results may differ significantly from the results that would be obtained with accurate and complete information; this may require a revision of this report.

### **Decrement Assumptions**

The following table shows the assumptions that have been made concerning the rates at which members will leave the Plan due to retirement.

Age X	Assumed Retirement Rate
55-59	10% at each age
60-64	20% at each age
65	100%

No allowance has been made for deaths or disablements.

# Appendix C

# **Calculation of the Actuarial Value of Accrued Benefits**

The calculation of the Actuarial Value of Accrued Benefits has been carried out using a method of apportionment of benefits between past and future membership that satisfies the requirements of Professional Standard No. 402 of the Actuaries Institute and is acceptable for Australian Accounting Standard AASB 1056 purposes.

#### **Defined Benefits**

The past membership components of all defined benefits payable in the future from the Plan in respect of current membership are projected forward allowing for assumed future salary increases and credited interest rates and are then discounted back to the investigation date at the investment return rate assumed for the investigation.

The past membership component for each type of benefit is based on the member's accrued benefit multiple or relevant account balances at the investigation date.

The weighted average term of the accrued benefit liabilities is 4 years.

#### **Accumulation Benefits**

The value of accumulation benefits has been taken as the sum of the balances held in accumulation accounts at the date of the investigation.

#### Methodology of Calculating the Actuarial Value of Accrued Benefits

The method used for the determination of Accrued Benefits is the same as that used at the previous investigation.

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