

Annual Outcomes Assessment

Santos Superannuation Plan

Financial year ending 30 June 2024

The information is published in accordance with the requirements of s52(9) of the Superannuation Industry (Supervision) Act 1993 ('legislation').

Product	Trustee	Super Fund	Category
Santos Superannuation Plan (the Product)	Mercer Superannuation (Australia) Limited (MSAL or Trustee)	Mercer Super Trust (MST)	MySuper and Choice

Purpose

As required by legislation, this document contains:

- the Trustee's determination as to whether the financial interests of the beneficiaries holding the Product are being promoted by the Trustee having regard to the assessments and comparisons prescribed by legislation; and
- a summary of the assessments and comparisons upon which the Trustee's determination is based. The Trustee's determination is as of 27 February 2025 and is based on information for the year ended 30 June 2024, as well as changes to the Product made after that date.

Overall Determination

The Trustee has determined that the financial interests of the beneficiaries holding the Product are **being promoted**.

This is based on the assessments and comparisons summarised below. In doing so, the Trustee compared the Product against MySuper products and other Choice investment options offered by regulated superannuation funds.

Summary of the Trustee's assessment

When carrying out the assessment, the Trustee considered a number of factors including, fees and costs, investment performance and options, insurance fees and options, and the overall size and scale of the Mercer Super Trust.

The assessment consists of two sections. The table below provides a summary of the factors considered for each Section.

Factor	Rating
Section One	
Fees and costs	
Investment returns	
Investment risk	
Section Two	
Options, benefits and facilities	
Investment strategy	
Insurance strategy	
Insurance fees	
Scale	
Operating costs	
Basis for setting fees	

Determination	Colour Rating
Members' financial interests are promoted	
Members' financial interests are mostly promoted	
Members' financial interests are not promoted	

Section One: Summary of our performance assessment

Guide to reading this section

Comparison Table Key

Quartile	Colour Rating
Bottom 25% of Products (Bottom Quartile) (Q4)	
Bottom 50% to 25% of Products (Below Median) (Q3)	
Top 50% to 75% of Products (Above Median) (Q2)	
Top 25% of Products (Top Quartile) (Q1)	

For Fees and costs, Above Median refers to the fees being less expensive than the median. Below Median refers to the fees being more expensive than the median.

For Investment returns, Above Median refers to the returns being higher than the median. Below Median refers to the returns being lower than the median.

This section provides the outcome of the Trustee's assessment of Fees and costs, Investment returns and Investment risk compared to peers and benchmarks.

1. Fees and costs

Determination	Assessment
Members' financial interests are promoted	<p>MySuper - Mercer SmartPath achieved a Q1 ranking relative to all MySuper products for the year to 30 June 2024 based on an assessment of fees and costs.</p> <p>Choice - The Choice fees and costs are mid-market or better (Q1 or Q2) for most options. The \$50,000 and \$100,000 balance comparisons have one option ranked at Quartile 2 with the rest being Q1.</p>

The Trustee remains committed to delivering products and investment options that promote member outcomes and foster growth to enable benefits of increased scale to be passed onto members.

MySuper

Table 1 - Mercer SmartPath MySuper annual fees and costs comparison compared to the APRA MySuper median¹

Product	MySuper annual fees and costs
Mercer SmartPath	\$380.00
MySuper median	\$415.00

Choice

Table 2 – Choice fees and costs competitor rankings for \$50,000 balance

		For \$50,000 balance			
Fee category	Investment option	Administration fees and costs	Total fees and costs		Quartile
High Growth	Mercer High Growth	0.07%	0.82%	8 / 59	Q1
Growth	Mercer Growth	0.07%	0.69%	3 / 67	Q1
Balanced	Mercer Moderate Growth	0.07%	0.79%	8 / 56	Q1
Conservative	Mercer Conservative Growth	0.07%	0.67%	9 / 67	Q1

Table 3 – Choice fees and costs competitor rankings for \$100,000 balance

		For \$100,000 balance			
Fee category	Investment option	Administration fees and costs	Total fees and costs	Rank	Quartile
High Growth	Mercer High Growth	0.07%	0.82%	10 / 59	Q1
Growth	Mercer Growth	0.07%	0.69%	5 / 67	Q1
Balanced	Mercer Moderate Growth	0.07%	0.79%	15 / 56	Q2
Conservative	Mercer Conservative Growth	0.07%	0.67%	12 / 67	Q1

2. Investment returns

Determination	Assessment
Members' financial interests are mostly promoted	<p>MySuper – Mercer SmartPath achieved predominantly a Q1 and Q2 ranking relative to peers over 1, 3, and 5 years to 30 June 2024 (net of fees and taxes).</p> <p>MySuper return figures for Santos have been 'stitched' to allow for the change in the Santos MySuper investment option from 1 June 2022 to Mercer SmartPath. The previous Santos MySuper default option was the Mercer Growth investment option.</p> <p>Choice - For Choice, most options are rated mid-market or better (Q1 or Q2) over the different periods. For 1-year results, three of the four rated options are ranked Q1 or Q2. For 3-year and 5- year results, three of the four rated options are ranked Q1.</p>

¹ Source: APRA Quarterly MySuper Statistics Tables 2b SRF 700.0 – Item 4 (30 June 2024) and based on a balance of \$50k.

MySuper

Under the Government's Your Future, Your Super reforms, which came into effect on 1 July 2021, APRA is required to conduct an Annual Performance Assessment (**APA**) for MySuper products. The APA assesses the investment performance over a ten-year time horizon. Based on the APA results released by APRA on 30 August 2024, the Product **passed** the APA.

Investment returns vary according to the level of risk taken for each Mercer SmartPath cohort. Instances of Q3 and Q4 performance can largely be attributed to lower growth asset allocation compared to peers within the same risk label or the whole MySuper cohort.

Table 4 - Mercer SmartPath net investment returns for a representative member (account balance of \$50,000) as at 30 June 2024²

Lifecycle Stage	1 yr. net return (% p.a) ³	3 yr. annualised net return (% p.a)	5 yr. annualised net return (% p.a)	Stage of glidepath ⁴
Born 1929 to 1948	N/A	N/A	N/A	Post glide
Born 1949 to 1953	7.83%	3.66%	4.69%	Post glide
Born 1954 to 1958	7.78%	4.07%	5.60%	In glide
Born 1959 to 1963	8.98%	4.28%	5.73%	In glide
Born 1964 to 1968	10.18%	4.83%	6.06%	In glide
Born 1969 to 1973	11.46%	5.46%	6.45%	Pre glide
Born 1974 to 1978	11.57%	5.95%	6.74%	Pre glide
Born 1979 to 1983	11.58%	5.99%	6.77%	Pre glide
Born 1984 to 1988	11.72%	5.99%	6.77%	Pre glide
Born 1989 to 1993	11.74%	6.00%	6.77%	Pre glide
Born 1994 to 1998	11.57%	5.99%	6.77%	Pre glide
Born 1999 to 2003	11.43%	5.92%	6.72%	Pre glide
Born 2004 to 2018	N/A	N/A	N/A	Pre glide

Santos MySuper return figures have been 'stitched' to allow for the change in the Santos MySuper investment option from 1 June 2022 to Mercer SmartPath. The previous Santos MySuper default option was the Mercer Growth investment option.

Choice

APRA introduced the APA for Trustee-directed Products covering both Platform and Non-Platform type products from 1 July 2023 onwards. All MST Choice options surveyed within the 2023-24 APA, **passed** the APA.

Investment returns will vary according to the asset class or level of risk taken for each Choice investment option. The Santos Superannuation Plan has access to the full MST Choice menu. Assessment of the MST Choice investment menu has been completed within the MST Choice AOA. The four largest investment options based on Santos Superannuation Plan members have been considered and no under-performance issues were identified. None of the four largest Santos Superannuation Plan investment options were considered outliers within the MST Choice AOA.

² Quartile rankings are based on risk bands to provide a more accurate assessment compared to ranking against all MySuper funds

³ Values only provided for options funded as at 30 June 2023

⁴ Mercer SmartPath cohorts sit on a glidepath. Younger cohorts (with members aged under ~55 years of age) will be classified as pre-glide as their growth assets haven't begun to decrease. While older cohorts could be classified as in-glide or post-glide depending on whether their growth allocation for their age cohort has reached the terminal growth asset allocation, of roughly 60%.

3. Investment risk

Determination	Assessment
Members' financial interests are promoted	<p>MySuper - The Mercer SmartPath options level of investment risk is lower than comparable MySuper products. The only option that is ranked in the equivalent to Q2 is the 1959 to 1963 option. All other options would be considered Q1.</p> <p>Choice - The Trustee ensures that it has a range of options available for members to choose from, with different risk characteristics and investment objectives. During the last review in 2024 the Trustee confirmed that the level of investment risk in each Choice investment option is appropriate.</p>

MySuper

The level of investment risk for MySuper products has been measured using the methodology set out in *APRA Reporting Standard SRS 700.0 Product Dashboard*.

The Mercer SmartPath cohorts ranked in Q1 for taking the least amount of risk within its designated Standard Risk Measure (**SRM**) label.

Table 5 – Mercer SmartPath rankings against other MySuper products with the same risk label

Lifecycle Stage	Estimated number of negative net investment returns over a 20-year period	Stage of glidepath
Born 1929 to 1933	3.20	Post glide
Born 1934 to 1938	3.20	Post glide
Born 1939 to 1943	3.20	Post glide
Born 1944 to 1948	3.20	Post glide
Born 1949 to 1953	3.20	Post glide
Born 1954 to 1958	3.20	In glide
Born 1959 to 1963	3.70	In glide
Born 1964 to 1968	4.00	In glide
Born 1969 to 1973	4.20	Pre glide
Born 1974 to 1978	4.20	Pre glide
Born 1979 to 1983	4.20	Pre glide
Born 1984 to 1988	4.20	Pre glide
Born 1989 to 1993	4.20	Pre glide
Born 1994 to 1998	4.20	Pre glide
Born 1999 to 2003	4.20	Pre glide
Born 2004 to 2008	4.20	Pre glide

Lifecycle Stage	Estimated number of negative net investment returns over a 20-year period	Stage of glidepath
Born 2014 to 2018	4.20	Pre glide

The benefit of the lifecycle strategy is that it is designed with a whole of life approach in mind. The level of investment risk will adjust accordingly for each cohort, with pre-glide and in-glide cohorts taking on more levels of investment risk, while post-glide cohorts taking on lower levels of investment risk but better downside protection.

Choice

There is no publicly available information which provides a breakdown of the level of investment risk for each Choice product and therefore it is difficult to make reasonable comparisons against the industry. However, the net returns assessment implicitly takes into account a comparison of investment risk.

The Trustee performs an annual review of each Choice investment option to understand the level of investment risk inherent in each option and whether that would be in line with the expectations of the members who are invested in that option. During the last review in 2024 the Trustee confirmed that it was comfortable with the level of investment risk in each Choice investment option.

Section Two: Summary of the assessment factors

The Trustee's assessment of the Product as at 30 June 2024 is based on the following criteria specified by the legislation.

Factor	Determination
Options, benefits and facilities	<p>Members' financial interests are promoted</p> <p>The options, benefits and facilities are appropriate for Santos Superannuation Plan members having regard to the financial interests of beneficiaries in this product.</p> <p>MST offers access to a broad range of investment options from lifecycle to choice. Insurance coverage is across approximately three quarters of the membership with the highest ratings across all offerings by external ratings houses such as Chant West and SuperRatings. The Trustee is focused on continuing to uplift the member and digital member experience, as well as enhancing the advice offering that supports our members' journey into and in retirement.</p>
Investment strategy	<p>Members' financial interests are promoted</p> <p>The last annual investment strategy review was completed in November 2024.</p> <p>The review identified that:</p> <ul style="list-style-type: none"> - the current shape of the Mercer SmartPath glidepath continues to be the most optimal in terms of delivering expected retirement outcomes for default members; and - that for Mercer SmartPath options plus most Choice options the Strategic Asset Allocation (SAA) modelling outcomes are within acceptable ranges, and that the probability of meeting the investment objective, downside risk, factor risk, liquidity and climate stress testing remain satisfactory. <p>Changes to asset allocations for Mercer SmartPath have been approved which are expected to improve investment diversification and member outcomes. Changes to the asset allocation have been approved for the Mercer Enhanced Passive options, which are expected to reduce volatility and downside risk.</p>
Insurance strategy	<p>Members' financial interests are promoted</p> <p>The last comprehensive independent review of the Insurance Management Framework (IMF) occurred in September 2023, with the next independent review due to occur in 2026. The outcomes of the review concluded that the IMF (and Insurance strategy) are operating effectively in members' best financial interests.</p> <p>The IMF also undergoes an annual review to ensure that changes to MSAL's business operations are appropriately reflected in the IMF. The IMF was last updated in September 2024.</p> <p>The Trustee's insurance strategy underpins a strong insurance offer, making a range of insurance benefits available to members. The nature of the insurance offer reflects the differing needs of members. In cases where default cover is provided on an automatic basis, members can adjust or cancel their cover at any time to ensure that the cover they hold is appropriate and affordable for their circumstances.</p> <p>For insured members, there is a continuing focus to reduce frictions in the member servicing model and improving claims admittance rates and claims durations.</p>

Insurance fees	<p>Members' financial interests are promoted</p> <p>Ensuring that insurance fees charged in relation to a product are affordable and do not inappropriately erode the retirement income of beneficiaries is a key objective of the Trustee's insurance strategy.</p> <p>The approach applied by the Trustee to meet this objective is that the cost of default cover provided to members on an automatic basis should not generally exceed 1% of a member's estimated salary. For Santos Superannuation Plan the cost of insurance provided to members on an automatic basis does not generally exceed 1% of an estimated salary. There is a risk of exceeding this threshold for some cohorts of members, for example, members who have moved to the Retained division with high default levels of cover.</p> <p>On balance, insurance fees for members are broadly aligned with the financial interests and needs of beneficiaries. However, for some members, an opportunity exists to improve the competitiveness of insurance fees.</p> <p>The Trustee continues to focus on ensuring affordability of insurance premiums and that these do not unduly erode member retirement balances.</p>
Scale	<p>Members' financial interests are promoted</p> <p>Scale has grown for the Product and the overall MST over the year. The number of member accounts across MST increased by ~148,000 and FUM increased by \$1.2billion.</p> <p>Santos Superannuation Plan and MST both have sufficient scale to be sustainable. Although this Annual Outcomes Assessment is for Santos Superannuation Plan specifically, the product benefits from the full scale of the Trustee's operations. The Trustee remains committed to offering and managing products and investment options that enhance member outcomes and foster growth, allowing the advantages of scale to be shared with members.</p>
Operating costs	<p>Members' financial interests are promoted</p> <p>The Trustee incurs operating costs in ensuring the efficient and effective operation of the MST, including Santos Superannuation Plan. Both current and projected operating costs per member are reasonable with the net operating income per account remaining stable and sustainable.</p>
Basis for setting fees	<p>Members' financial interests are mostly promoted</p> <p>One of the Trustee's strategic objectives is to deliver competitive products and services. The Trustee recognises that the manner in which fees are charged to MST members is a material consideration in assessing the promotion of members' financial interests.</p> <p>The Trustee annually assesses the appropriateness of the fees charged to Santos Superannuation Plan beneficiaries. The basis for setting fees continues to be suitable for the Product, recognising that the Trustee is continuing to enhance and improve its policies and procedures.</p>

Issued by Mercer Superannuation (Australia) Limited (MSAL) ABN 79 004 717 533, Australian Financial Services Licence 235906, the trustee of the Mercer Super Trust ABN 19 905 422 981 ('Mercer Super').

Any advice provided is of a general nature and does not take into account your objectives, financial situation or needs. Before acting on any advice we recommend you obtain your own financial advice and consider the Product Disclosure Statement available at mercersuper.com.au. The product Target Market Determination can be found at mercersuper.com.au/tmd.

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Ratings are likely to change and are only one factor to be taken into account when deciding to invest in a product.

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