

APRA Regulated Entity Responsible Investment Policy

IOOF Investment Management Limited
(IIML)
OnePath Custodians Pty Limited (OPC)
Oasis Fund Management Limited (OFM)

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Table of Contents

1. Overview	2
1.1. Purpose	2
1.2. Objectives	2
1.3. Scope & Application	2
2. Responsible Investment (RI)	3
2.1. What is Responsible Investment?	3
2.2. ESG & Sustainability Factors	5
2.3. Responsible Investment Beliefs	5
2.4. Measurement & Reporting	7
2.4.1. Externally Managed Investment Options	7
2.4.2. Related Party Investment Options	7
2.4.3. Stress Testing	8
3. Position on Climate Change, Modern Slavery & Controversial Holdings	8
3.1. Modern Slavery	8
4. Proxy Voting	9
5. Consequences of Non-Compliance	9
6. Review & Approval	10
7. Document Information	10
7.1. File Details	10
7.2. Revision History	10
Appendix 1: Roles & Responsibilities	11
Appendix 2: Key Concepts & Definitions	13

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1. Overview

1.1. Purpose

The APRA Regulated Entity (**ARE**) Responsible Investment Policy (**Policy**) recognises the role that Responsible Investment (**RI**) plays in the assessment, selection and monitoring process for investment options and outlines the protocols and processes for identifying and managing Environmental, Social and Governance (**ESG**) risks and opportunities (known as **ESG factors**).

The Policy forms part of the Investment Governance Framework (**IGF**) and should be read in conjunction with that document.

1.2. Objectives

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

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

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

ESG and sustainability factors are defined in section 2.2.

1.3. Scope & Application

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

- IOOF Investment Management Limited (**IIML**).
- OnePath Custodians Pty Limited (**OPC**).
- Oasis Fund Management Limited (**OFM**).

Collectively known throughout this Policy as the AREs unless separately stated.

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

This Policy sets out broad principles on responsible investing including the AREs':

- Responsible Investment (**RI**) Beliefs
- Approach to reporting and measurement of RI;
- ESG, Ethical, Sustainable or Socially Responsible Investment options (if any); and
- Position on Climate Change, Modern Slavery and Controversial Holdings.

Where the AREs make investment options available on their investment menus, these are managed by Investment Managers (**Managers**) and include:

- investment options where the Manager and/or the Responsible Entity (**RE**) is an IFL entity (**Related Party Investment Options**), and
- investment options where the Manager and/or RE is not an IFL entity (**Externally Managed Investment Options**).

The Related Parties include (but are not limited to) IOOF Investment Services Limited (**IISL**) and OnePath Funds Management Limited (**OPFM**). For more information about how the Related Parties and any Managers in the IFL group of companies consider RI, this information will be in their RI policy.

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

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

The ANZ Smart Choice branded options and the Smart Choice Lifestage Investment Options are largely managed by index or passive managers.

The AREs recognise that in addition to having an approach to RI when selecting investment options for inclusion on the investment menu, some Members want access to investment options specifically designed to address ESG, Ethical, Sustainable or Socially Responsible considerations. As a result, investment options marketed as ESG, Ethical, Sustainable or Socially Responsible may be included across the investment menus.

Investment options marketed as ESG, Ethical, Sustainable or Socially Responsible must be "true to label" in the sense that the branding of the investment option aligns with its underlying investment strategy including its asset allocation and, where relevant the degree of ESG Integration and the approach to Active Stewardship.

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

2. Responsible Investment (RI)

2.1. What is Responsible Investment?

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

The key pillars of RI are:

1. **ESG Integration** – identifying and considering ESG factors in the investment decision-making process to improve investment outcomes; and

2. Active Stewardship – exercising ownership rights such as proxy voting and engaging (where appropriate and practicable) with the issuing entities to improve investment outcomes.

ESG Integration and Active Stewardship are the key aspects of RI as practised across the asset management industry and recognised by the global peak industry body Principles of Responsible Investment (PRI). The extent to which ESG Integration and Active Stewardship are considered, is outlined in section 1.3.

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

ESG and sustainability factors are defined in section 2.2.

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

RI approach	Description	Extent adopted by the AREs*
‘Socially Responsible’ or ‘Ethical’ investing	The Manager emphasises moral or ethical considerations and values over other information that may be relevant to investment outcomes.	Externally Managed Investment Options marketed as ESG, Ethical, Sustainable or Socially Responsible.
‘Sustainable Investing’	The Manager explicitly targets companies that have a measurable and specific benefit to society such as being aligned to one of the United Nations Sustainable Development Goals (SDGs).	Not currently adopted.
‘Negative Screening’	The Manager excludes particular companies from an investment portfolio because of their particular business activity e.g., tobacco producers.	Not currently adopted.
‘Positive Screening’ or ‘Thematic’ investing	The Manager limits an investment portfolio to companies that undertake a specific activity e.g., renewable energy-related companies.	Not currently adopted.
‘Impact’ investing	Explicitly acknowledges that investment returns are made up of both financial returns and measurable societal benefits, representing an investment outcome that would not be achievable in the absence of the long-term commitment of members’ capital (known as additionality).	Not currently adopted.

* The RE or Manager of an investment option may adopt a different approach to the ARE. More information on whether the RE or Manager for an investment option uses these approaches, is available from their PDS or their RI policy.

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

2.2. ESG & Sustainability Factors

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

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

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

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

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

2.3. Responsible Investment Beliefs

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

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

The RI Beliefs are:

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

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

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

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

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

- Engagement (where appropriate) with entities (including via proxy voting) can result in improved practices and strategic decisions, creating the opportunity for enhanced investment outcomes for Members. The AREs' engagement with entities is generally limited to proxy voting in certain circumstances. Engagement is undertaken by the Manager and conducted in accordance with their own policies and procedures.
- Proxy voting will be conducted in accordance with the AREs' Proxy Voting information (see section 4).

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

- Driven by the emission of greenhouse gases into the atmosphere, accelerating climate change carries significant risks to human health, economies and ecosystems. Effective responses will involve a combination of climate mitigation and adaptation measures.
- Since the 2015 Paris Agreement was signed, it is recognised that reaching net zero carbon dioxide emissions around 2050 is required to turn the goals outlined in the agreement into reality.

- Coupled with regulatory tailwinds, technological innovation is giving rise to increasing investment opportunities from the provision of climate and environmental solutions, in areas including clean energy and mobility, sustainable buildings and advanced materials. There is a growing number of specialised investment products – including low-carbon (active and index) investment options, sustainability-linked debt and others – we believe it is important to consider these investment opportunities.

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

2.4. Measurement & Reporting

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

2.4.1. Externally Managed Investment Options

The Investment Governance Team monitor the performance of Managers and underlying investment options, including ESG investment options.

As part of the annual Manager Attestation Survey for the Externally Managed Investment Options, the Investment Governance Team:

- collects each Manager's ESG policy, if available;
- confirms if the Manager is a signatory to the Principles for Responsible Investment (**PRI**); and;
- obtains a copy of the manager's Modern Slavery Statement or if not applicable, reviews the manager's awareness and integration of the *Modern Slavery Act (2018)* (Cth) in the investment selection process and ESG policy.

This information provides the Investment Governance Team with a guide of a Manager's ESG integration into its investment processes. This information is assessed when considering investment options promoted as either ESG, Ethical, Sustainable or Socially Responsible for potential addition to the menus and is used to verify information on these investment options as part of reviewing the investment menus.

2.4.2. Related Party Investment Options

In relation to Related Party Investment Options, the AREs place reliance upon the application and effectiveness of the Related Party's ESG policy and procedures.

The status of a Related Party's RI or ESG policy is assessed annually as part of the RSE's Operational Due Diligence review.

2.4.3. Stress Testing

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

- **Transition** – Tests the potential market reaction to a sudden shift in the likelihood of a 2°C scenario, where economies transform to a low-carbon energy mix and there is the greatest chance of lessening physical damages, together with greater market awareness of this shift. The scenario temperature refers to the global mean surface increase above pre-industrial levels by 2100.
- **Low Mitigation** – Tests the potential market reaction to a sudden shift in the likelihood of a 4°C scenario, reflecting fragmented policy pathways to a low-carbon economy and where there is a serious failure to alleviate anticipated physical damage, together with greater market awareness of this shift. The scenario temperature refers to the global mean surface increase above pre-industrial levels by 2100.

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

3. Position on Climate Change, Modern Slavery & Controversial Holdings

The AREs recognise the importance of Climate Change, Modern Slavery and Controversial Holdings as having financial implications including risks for the investments of its investment options and therefore long-term returns to members.

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

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

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

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

3.1. Modern Slavery

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

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

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

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

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

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

4. Proxy Voting

The information in this section outlines the AREs’ approach to Proxy Voting, which is broader than voting on RI matters. We currently don’t apply a specific RI overlay to our Proxy Voting. Proxy Voting decisions will be made prioritising members’ best financial interests. Where the AREs have the ability to vote, e.g., where they hold units, on behalf of Members in a managed investment scheme managed by a related or external party, the AREs will typically vote on unit holder resolutions where there could be adverse outcomes for Members if the AREs did not participate in the vote. We would typically not vote on non-contentious items.

Voting is conducted on behalf of some Members who directly hold ASX listed securities.

Outside of the above scenarios, the AREs do not conduct Proxy Voting. Proxy Voting in relation to the Related Party and Externally Managed investment options may occur in different circumstances to those set out above for the AREs and may be, where applicable, in accordance with the Related Party or external Managers’ own Proxy Voting policy.

5. Consequences of Non-Compliance

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

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

6. Review & Approval

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

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

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

7. Document Information

7.1. File Details

Title	APRA Regulated Entity Responsible Investment Policy
Owner	General Manager, Investment Governance
Approved by	IIML, OPC and OFM Boards
Hierarchy level	Level 1 – Board Approved Policy
Effective date	1 December 2023
Last reviewed	October 2023
Next review	October 2024
Atlas ID	1045740

7.2. Revision History

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

Appendix 1: Roles & Responsibilities

Roles & responsibilities	
Roles	Responsibility
Board	<p>An ARE's Board is responsible for ensuring the AREs meet their fiduciary, statutory and regulatory responsibilities as it relates to investment activities, including RI. In relation to RI, the Board is responsible for:</p> <ul style="list-style-type: none"> • Approving the RI Policy, including (but not limited to) establishing Objectives for the Policy, outlining RI Beliefs and specifying the Scope and Application of the Policy. • Approving the RI Strategy, looking at industry best practice, member trends and regulatory change impacting RI and formulating an appropriate strategy. • Approving the use of Negative Screens and other approaches which complement RI and apply either across the Fund or at the individual investment option level. • Appointing service providers to undertake RI activities.
Board Investment Committee	<p>The relevant committee of the Board in relation to this Policy is known as the Superannuation Trustee Investment Committee (STIC).</p> <p>The STIC is responsible for supporting the Board in relation to investment matters including (but not limited to):</p> <ul style="list-style-type: none"> • Reviewing, endorsing and recommending approval by the Board of changes to the RI Policy. • Approving new investment options, including those promoted as ESG, Ethical, Sustainable or Socially Responsible. • Approving changes to parameters (e.g., investment fees, investment objectives and asset allocations) for any investment options, including those promoted as ESG, Ethical, Sustainable or Socially Responsible. • Approving the way complementary RI approaches are applied, for example, negative screens. • Overseeing the reporting and measurement of RI activities, as outlined in the RI Policy.
Risk Management	<p>The Risk Management function, as the 2nd line of defence, is responsible for:</p> <ul style="list-style-type: none"> • Overseeing and challenging the RI activities and provision of appropriate policy, tools, guidance, insight, and reporting. • Facilitating the setting of risk appetite in relation to RI risks. • Providing subject matter expertise to guide and assist in all steps throughout RI Policy development and maintenance. • Providing advice and consultation to business management on matters relating to the RI Policy.

Insignia Financial | APRA Regulated Entity Responsible Investment Policy

	<ul style="list-style-type: none"> Assist with the development of controls and control testing in relation to the RI Policy, including RI activities outlined within the policy.
Insignia Legal	<p>The Insignia Legal team provides:</p> <ul style="list-style-type: none"> Advice on whether an ARE has satisfied its legal requirements in relation to RI, as requested, and Support to the ARE on matters of law relating to RI, including the review of the RI Policy and RI Disclosure.
Investment Governance Team	<p>The Investment Governance Team is the 1st line of defence and is responsible for:</p> <ul style="list-style-type: none"> Developing the RI Policy (in accordance with group templates and guidelines). Maintaining, reviewing, and testing the RI Policy annually at a minimum, or more frequently if material changes have occurred. Assessment of all new investment options' approach to RI, where possible. Ensuring controls in relation to RI are appropriate and current. Ensuring all employees with a designated role in relation to RI are made aware of, and trained for their role, responsibilities, and accountabilities with respect to this policy. Rectifying RI issues, incidents and action plans arising from testing and internal audit reviews. Liaising with other Insignia teams to ensure successful operationalisation of this RI policy. Assisting in the governance related to the approvals for RI parameters and new RI investment option development. Developing the RI Strategy, along with key stakeholders including the Portfolio Manager, Member Office, Asset Consultant and the Board. Conducting monitoring and reporting activities in accordance with the RI Policy.
Member Office	<p>The primary role of the Member Office in relation to RI is:</p> <ul style="list-style-type: none"> Support the RSE Boards in monitoring Service Providers in relation to their responsibilities in relation to RI (in accordance with SPS231 Outsourcing). Review policies and papers in relation to any approvals for RI. Ensuring implementation of any changes to the RI Policy are in accordance with the requirements of SPS530. Represent the RSE Boards as a Member advocate in key RI related forums.

Appendix 2: Key Concepts & Definitions

Key concepts and definitions	
Terms	Definitions
APRA	Australian Prudential Regulation Authority.
AREs – “we”, “us”, “our”	APRA Regulated Entities, in this case IOOF Investment Management Limited (IIML), OnePath Custodians Pty Limited (OPC) and Oasis Fund Management Limited (OFM).
ASX	Australian Stock Exchange.
Board	Reference to IFL and its subsidiary boards including its licensed entity boards (combined or individually), in this case IIML, OPC and OFM Boards.
Documents	Reference to our policies, charters, terms of reference, procedures, guidelines, plans, codes, frameworks, strategies, and statements (including any other supporting artefacts).
Executive Team	<p>The executive management team of IFL comprises the following:</p> <ul style="list-style-type: none"> • Chief Advice Officer; • Chief Asset Management Officer; • Chief Corporate Affairs & Marketing Officer; • Chief Distribution Officer; • Chief Financial Officer; • Chief Legal Officer; • Chief Member Officer; • Chief Operating & Technology Officer; • Chief People Officer; • Chief Risk Officer; • Chief Transformation Officer; and • Group Company Secretary.
IFL	Insignia Financial Ltd (ABN 49 100 103 722) and or “Insignia”.
IFL Board	The Board of IFL.
Insignia Financial or the group	IFL, the IFL subsidiaries and related bodies corporate.
Investment Governance Framework (IGF)	The Investment Governance Framework – Superannuation sets out how IOOF Investment Management Limited (IIML), OnePath Custodians Pty Limited (OPC) and Oasis Fund Management Limited (OFM) as trustees of Registerable Superannuation Entities (RSE) meet their investment governance responsibilities to beneficiaries.

Insignia Financial | APRA Regulated Entity Responsible Investment Policy

	The Investment Governance Framework (IGF) is the totality of systems, structures, policies, processes and people to address the ARE's responsibilities with regard to investments of each RSE within its business operations.
Investment Manager (Manager)	An entity responsible for the execution and management of an investment strategy available through an Investment Option on the Investment Menu of one of the AREs.
Investment Menu	An investment menu refers to the suite of Investment Options which are offered to Members of a particular ARE product.
Investment Option	An 'investment option' refers to a pooled investment arrangement which is offered to Members.
Investors	Investors in any investment scheme operated by any entity within IFL in its capacity as the RE and investors in investor directed portfolio services issued by entities within IFL in its capacity as the RE.
Management	The management of Insignia Financial.
Member	Members in the context of this Policy include Superannuation Fund Members.
Owner	The Owner is responsible for the Document at all stages of the policy lifecycle.
People	Reference to employees of Insignia Financial, may also include contractors and other individuals working for or on behalf of the group.
Products	Products for the purposes of the Policy refer separately or collectively where relevant to Superannuation Products.
RE	A responsible entity, being the company named in ASIC's record of the scheme's registration as the responsible entity of the investment scheme in accordance with s601EB of the Corporations Act.
Related Party	In relation to an ARE or an RE, a related body corporate within the meaning of the <i>Corporations Act 2001</i> (Cth).
Responsible Investment (RI)	RI is an umbrella term used to describe methodologies that incorporate ESG and sustainability considerations into the analysis, selection and monitoring of investments.
RSE	A Registrable Superannuation Entity, which is a regulated superannuation fund or an approved deposit fund or a pooled superannuation trust but does not include a self-managed superannuation fund. Registration of RSEs is affected under Part 2B of the Superannuation Industry (Supervision) Act 1993.

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