

## Register of Relevant Interests and Duties

Vanguard Super Pty Ltd ('VSPL'), ABN 73 643 614 386, is an RSE Licensee and acts as Trustee of the Vanguard Super Fund. VSPL is wholly owned by Belleisle LLC.

**Relevant Duty:** Refers to any duty owed by the Trustee or Responsible Person of the Trustee, to Beneficiaries or to any other person that the Trustee has determined to be relevant having regard to the factors below:

- Whether the duty is a one-off occurrence or whether the duty has an ongoing, recurring or cumulative effect;
- The extent to which a role giving rise to a duty could influence the duties owed by the Trustee or Responsible Person, to Beneficiaries.

**Relevant Interest:** Refers to any gift, emolument or benefit, whether pecuniary or non-pecuniary, directly or indirectly held by the Trustee, associate or Responsible Person that the Trustee has determined to be relevant having regard to the factors outlined below:

- If a Director has a connection to a nominating body or appointer, the extent to which there may be a conflict between the interests of Beneficiaries and the interests of the nominating or appointing body;
- Consideration of the dollar value of the interest held and whether the dollar value arises from a single transaction or a cumulative amount arising from a series of potentially smaller amounts;
- In the case of a RSE Auditor, whether the Auditor may undertake their role in a manner that is not consistent with the interests of Beneficiaries.

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NAME & TRUSTEE RESPONSIBILITIES	OTHER VANGUARD RELEVANT DUTIES	EXTERNAL RELEVANT DUTIES	RELEVANT INTERESTS	DATE DECLARED
<b>DIRECTORS</b>				
<b>Peggy O'Neal</b> <ul style="list-style-type: none"> <li>Independent Director and Chair</li> <li>Member, Audit &amp; Risk Committee</li> <li>Member, Remuneration Committee</li> <li>Member, Investment Committee</li> </ul>	None	Consultant, Lander & Rogers	None	13.8.20
<b>Robin Bowerman</b> <ul style="list-style-type: none"> <li>Director</li> <li>Member, Audit &amp; Risk Committee</li> <li>Member, Remuneration Committee</li> <li>Member, Investment Committee</li> </ul>	None	None	None	9.7.24

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NAME & TRUSTEE RESPONSIBILITIES	OTHER VANGUARD RELEVANT DUTIES	EXTERNAL RELEVANT DUTIES	RELEVANT INTERESTS	DATE DECLARED
<b>Anne Flanagan</b> <ul style="list-style-type: none"> <li>Independent Director</li> <li>Chair, Audit &amp; Risk Committee</li> <li>Member, Remuneration Committee</li> </ul>	None	Director and Member, Audit Committee, Navy Health Ltd  Director, ANZ Staff Superannuation Pty Ltd	Holds Vanguard Personal Investor Account   	6.4.21   30.12.22
<b>Cynthia Lui</b> <ul style="list-style-type: none"> <li>Independent Director</li> <li>Member, Audit &amp; Risk Committee</li> <li>Chair, Remuneration Committee</li> </ul>	None	None	None	21.2.21
<b>David Stinnett</b> <ul style="list-style-type: none"> <li>Director</li> <li>Member, Audit &amp; Risk Committee</li> <li>Member, Remuneration Committee</li> <li>Member, Investment Committee</li> </ul>	Principal, Strategic Retirement Consulting and Investment Solutions (VGI)	None	None	1.8.25

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<b>Jan Swinhoe</b> <ul style="list-style-type: none"> <li>Independent Director</li> <li>Member, Audit &amp; Risk Committee</li> <li>Member, Remuneration Committee</li> <li>Chair, Investment Committee</li> </ul>	None	ING Bank Australia (non-executive director)	None	1.1.25
<b>Teifi Whatley</b> <ul style="list-style-type: none"> <li>Independent Director</li> <li>Member, Audit &amp; Risk Committee</li> <li>Member, Remuneration Committee</li> </ul>	None	None	None	1.1.25
<b>OTHER RESPONSIBLE PERSONS</b>				
<b>Anne Wright</b> <ul style="list-style-type: none"> <li>Company Secretary and (interim) Head of OST</li> </ul>	None	None	None	19.8.20

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<b>Aidan Geysen</b> <ul style="list-style-type: none"> <li>Senior Manager OST, Investment Governance</li> </ul>	None	None	None	13.5.22
<b>David Naunton</b> <ul style="list-style-type: none"> <li>Senior Manager OST, Risk &amp; Compliance</li> </ul>	None	None	None	11.1.21
<b>Zachariah Calabro</b> <ul style="list-style-type: none"> <li>Senior Manager, Enterprise Risk Management</li> </ul>	See note 1 below	None	Member of Vanguard Super	13.9.23
<b>Daniel Collard</b> <ul style="list-style-type: none"> <li>Head of Direct Investments &amp; Super Offer</li> </ul>	See note 1 below	None	Member of Vanguard Super  Holds Vanguard ETFs & Wholesale index funds	5.7.23
<b>Rosalind McCallum</b> <ul style="list-style-type: none"> <li>Finance Director, Superannuation &amp; Finance Delivery</li> </ul>	See note 1 below	None	None	13.7.23

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<b>Rachel Reynolds</b> <ul style="list-style-type: none"> <li>Head of Operations, Personal Investor</li> </ul>	See note 1 below	Director, Association of Superannuation Funds of Australia (from October 2024)	Member of Vanguard Super	30.6.23
<b>Renae Smith</b> <ul style="list-style-type: none"> <li>Head of Personal Investor</li> </ul>	See note 1 below	ASFA Executive Advisory Board	Member of Vanguard Super  Holds Vanguard ETFs	11.9.24  Updates declared 18.3.25
<b>Nicole Osborne</b> External auditor	None	None	None	23.2.21

Note 1: This role has responsibilities to the Trustee and to Vanguard Investments Australia Pty Ltd ('VIA').

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### TRUSTEE CONFLICTS

RELATED PARTY	POTENTIAL FOR CONFLICT	CONFLICT MANAGEMENT
Vanguard Investments Australia Pty Ltd , a connected entity of the Trustee	VIA has been appointed as a service provider to the Trustee in the following capacities: <ul style="list-style-type: none"><li>- as investment manager to the Trustee</li><li>- as investment consultant and advisor to the Trustee</li><li>- provision of other shared services to the Trustee.</li></ul> In addition, the Trustee is an investor in funds issued by VIA.	<p>VIA, as a service provider, was subject to due diligence and verification via external benchmarking prior to appointment which are completed on a regular basis.</p> <p>The Trustee has entered into SPS 231 compliant agreements on arm's length terms covering the services that allows for the arrangements to be terminated in appropriate circumstances.</p>
As above	The ongoing engagement of VIA as a service provider and responsible entity of VIA funds represents a conflict for the Trustee.	<p>The Trustee has entered into SPS 231 compliant agreements on arm's length terms covering the services that allows for the arrangements to be terminated in appropriate circumstances.</p> <p>Breach and remediation processes are the same as for any other third party.</p> <p>Arrangements are regularly benchmarked.</p>

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RELATED PARTY	POTENTIAL FOR CONFLICT	CONFLICT MANAGEMENT
As above	Because the Trustee has appointed VIA as the Investment Manager, Investment Consultant and has chosen Vanguard investments for the Vanguard Super fund, conflicts arise where there is a potential that VIA prioritises its own interests above those of Vanguard Super members.	<p>There is separation of roles within the investment teams performing services for VSPL.</p> <p>In addition, the OST reviews and challenges:</p> <ul style="list-style-type: none"> <li>- all investment related reporting</li> <li>- reviews undertaken by VIA of the Investment Governance Framework and investment strategies</li> <li>- advice or recommendations in relation to fund investments.</li> </ul> <p>Independent investment consultants may also be used by the OST.</p>
As above	Key staff are employed and remunerated by VIA. A conflict may arise where the remuneration and performance measurements for these staff does not align to Trustee interests.	The Trustee has input into remuneration arrangements and performance management processes for key staff, as well as into KPIs to ensure there is alignment to delivery of member outcomes.
As above	The services provided by VIA includes internal audit services.	<p>The agreement in place is on arm's length terms.</p> <p>Internal Audit is operationally independent and operates in accordance with an Internal Audit Plan with results reported to the Audit Committee.</p> <p>Requirements are in place on independence attestation and management of conflicts of interest.</p>



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RELATED PARTY	POTENTIAL FOR CONFLICT	CONFLICT MANAGEMENT
As above	The Trustee allows the deduction of advice fees from the superannuation product which creates a potential conflict where the value of the advice distribution network may be prioritised when determining the amount of advice fees permitted to be charged.	The amount of advice fee that may be charged to a member account is capped. Member consent is obtained in relation to all advice fees charged to a member's account. There is oversight of advisers and fee charging practices.