

# APRA Superannuation Data Transformation Phase 2 Consultation

UNISUPER SUBMISSION TO APRA

## About UniSuper

UniSuper began with a single, compelling idea: we can deliver better value. We are now one of Australia's largest superannuation funds, with more than 620,000 members and over \$130 billion in funds under management.

We are passionate about securing the future of our members, sharing in a wealth of wisdom and collective know-how.

We empower our members to be confident about their future and make better financial decisions.

### **About this submission**

UniSuper would welcome the opportunity to discuss the submission further and to provide additional information in respect of the comments made in this submission.

Should you have further queries, please contact [REDACTED] on [REDACTED] or

[REDACTED]

## General Comments

UniSuper welcomes the opportunity to respond to APRA's consultation on introducing new reporting standards as part of Phase 2 of the Superannuation Data Transformation (SDT) Program.

We are supportive of the suggested implementation timeframe that APRA has provided for the Phase 2 Release 1 forms. A longer initial consultation period followed by a minimum of 1 full year between the issuing of the final reporting standards enables an efficient allocation of resources across new and existing forms. The extended build timeframes should also enable us to take advantage of automation where possible. This is contrary to our experience during the build of SDT Phase 1 forms where the shorter timelines resulted in an immediate manual build. Process improvements were then implemented once these forms had gone into live production.

UniSuper has embraced the opportunity to discuss these proposed reporting standards through both industry workshops held by APRA as well as discussions across the industry.

We look forward to consulting on the proposals for the confidentiality and publication of data after the proposed reporting standards have been determined as noted in the discussion paper. A summary of the more detailed feedback and recommendations provided in [Appendix 3](#) is listed below:

Summary reference	Form & table	Recommendation	Page
1	SRF 551	APRA to provide more information on whether the aim of this reporting is to compare the liquidity practices across funds, or to ensure ongoing compliance with SPS 530 and/or others.	13
2	SRF 551.0 Tables 1 - 4	APRA to provide more guidance on 'redeemable for cash' definition alongside some detailed worked examples on how the major asset classes could be classified (such as listed equity) to assist in the design of this field.	13-14
3	SRF 551.0 Tables 1 - 4	APRA could consider whether this reporting could be completed using daily Investment Book of Record outputs instead of month end Accounting Book of Record outputs, reducing future costs of development given most of the reporting outputs are currently available in internal reporting.	14
4	SRF 551.1 Tables 1 & 2	APRA could split the current 'RSE Cash Flows' and 'Investment Option Cash Flows' into 2 separate tables for a) Member Cash Flows and b) Investment Cash Flows. Member cash flows can be reported at the product level, whereas investment cash flows can be reported as either accumulation or pension as this better aligns with how these cash flow types are treated internally.	14-15
5	SRF 551.1 Tables 1 & 2	APRA could consider including a 'Cash Flow Type' for 'Product Transfers' to capture the movements between accumulation and pension products, as internally we do not define these as 'Member Switches'.	15-16
6	SRF 551.2 Table 1	APRA to consider include a 'Total Option Flow' enumeration as part of the 'Liquidity Trigger Metric or Indicator' as the current allowable values are too specific to align to our internal Liquidity Policy. Otherwise, most of our trigger metrics/indicators will be reported under 'other'.	16
7	SRF 551.3 Table 1	APRA to consider removing the reporting of asset liquidation at an individual asset level due to the very high administration burden and lack of benefit it would offer, given it differs significantly from how this is monitored internally. Instead, reporting on each combination of asset class, asset listing and asset domicile is readily available.	16-17
8	SRF 553.0 Tables 1 & 2	APRA to consider moving away from a \$50m threshold as this will disproportionately impact larger funds, increasing the administration burden and related compliance costs. Instead, APRA could consider implementing one of the below methods:  1) Reporting of the top 20 Directly Held and Indirectly Held Listed Exposures (preferred).	17

		2) Using a threshold of the greater of 0.5% of FUM or \$50m. 3) Using just a percentage threshold of FUM of either 0.25% or 0.5%.	
9	SRF 553.1 All Tables	APRA could consider splitting the reporting of unlisted assets by 'Internally Managed' vs 'Externally Managed' instead of by 'Directly Held' or 'Indirectly Held' as this aligns much more closely with how unlisted assets are valued using the definitions and guidance in place for the current Portfolio Holdings Disclosure.	18
10	SRF 553.1 All Tables	APRA could align the reporting thresholds in the SRF 553.0 (Material Listed Exposures) and the SRF 553.1 (Unlisted Exposures) returns. With there currently being no threshold for the SRF 533.1 return, this will place a very high initial and ongoing administration burden on us and our external managers, with an increased cost of ongoing compliance to us, our external managers and therefore to our members.	18
11	SRF 553.1 Table 1 & 2	APRA to consider changing the percentage field of 'Proportion of Assets Revalued This Quarter' to a 'Assets Revalued this Quarter' with 'Yes' or 'No' enumerations. Otherwise, this field would always be either 0% where there has not been a revaluation or 100% where there has been a revaluation during the period.	18
12	SRF 553.1 Table 1	APRA could amend this return to require reporting only for Unlisted assets held within portfolios that have an unlisted strategic listing type. Unlisted assets can appear in a portfolio with a listed equity strategic listing (e.g. Pre-IPO or suspended equities) and these are not valued in line with other unlisted assets.	19
13	SRF 553.1 Table 2	If this reporting is left as for 'Indirectly Held' assets, the requirement to report the individual valuer could be restricted to just assets held by Special Purpose Vehicles that are a related connected entity to the fund. This data is more readily available to trustees than this data for externally managed assets.	19
14	SRF 553.1 Table 2	APRA to consider changing "Date of latest External audit assessment" to "Frequency of External audit assessment" as this output is available and does not require constant communication with approximately 60 external fund managers on a quarterly basis.	19
15	SRF 553.1 Table 2	APRA to provide more clarity on what type of reviews constitute the 'Review of Investment Manager Valuation Practice' field, whether this includes informal reviews or just formal reviews.	19-20
16	SRF 553.1 Table 3	APRA to clarify the look through data requirements of this form, which in our view should be completed on a non-look through basis. Otherwise, requiring us to reach out every quarter to every external investment manager and collate information on valuers, valuation methods of those valuers, proportion of assets revalued, and others would be a very time-consuming activity, with limited benefit compared to the increased cost it would bring.	20
17	SRF 553.2 Table 1	We suggest that APRA remove the Superannuation Product Identifier and Investment Menu Identifier fields from this return as these outputs only exist in our administration systems and not within custodial systems. We would therefore have to implement a complex apportionment method that would only be used in this reporting to populate this output.	20-21
18	SRF 553.2 Table 1	If APRA's key goal with this table is to isolate the impact of Out of Cycle Valuations (column 6) on individual options, we suggest that this return be restricted only to the unlisted investments that have had an out of cycle valuation during the reporting period.	20-21
19	SRF 553.2 Table 3	APRA could include the reporting of Country Exposures within the existing SRF 550.1 Investments return, rather than creating a new return for these outputs.	21
20	SRF 553.3 Table 2	Request that APRA clarify whether the asset class outputs should align with what are in our financial statements or if the classifications should align with other APRA submissions on Asset Allocation (e.g. SRF 550.0).	21
21	SRF 604.0 Table 3A	Include additional titles such as Professor and Emeritus Professor that are available in the existing SRF 600.0 form and are used by our current directors.	21-22
22	SRF 604.0 Table 3A	APRA to assess whether the existing SRF 520 Responsible Persons information could be used for the Year of Birth field for Director's rather than requiring this information to be reported again. APRA could also look to align the ad hoc reporting requirements to the existing SRF 605.0 and SRF 251.3	22

		returns, where all changes during a quarter are reported within 28 days of the quarter end.	
23	SRF 604.0 Table 3B	APRA to consider whether the ad hoc requirement of 'Other Directorships' is modified to 28 days from when we are notified by the director rather than 28 days from the effective date of the change.	22
24	SRF 604.0 Table 3B	Request that APRA make a singular list available to funds of all ASX listed and APRA regulated entities – currently these are in multiple locations.	22
25	SRF 604.0 Table 3C	APRA to consider removing the requirement of "50% income" as this can be very difficult to assess. We suggest instead having a "Full Time Equivalent" basis.	23
26	SRF 604.0 Table 4	APRA to consider adding 'Audit Risk and Compliance Committee' to the allowable enumerations for the 'Board or Board Committee Type' field.	23
27	SRF 607.0 Table 1B	APRA to provide further clarification on the definition of "Sub-fund" as we believe we have both a defined benefit AND employer sponsored sub-fund but are unable to enter as such.	23
28	SRF 552.0 Table 1	APRA to clarify whether collateral needs to be apportioned between the securities for each counterparty/account.	24
29	SRF 605.0 Table 5	APRA to consider requiring this table annually rather than quarterly, which would be in line with current SRF 001.0 and SRF 605.0 reporting.	25
30	SRF 251.4 Table 1	APRA to clarify if this form is required only for members with default insurance cover (as with SRF 251.3) and if the members included in the count should be members who have default level of cover at the end of the period whether originally offered or elected.	25
31	SRF 550.3	APRA to clarify their expectations on reporting 'Position type at Transaction' for derivatives. This is not currently available in our APRA reporting extracts.	26
32	SRF 550.3	APRA to clarify whether the SRF 550.3 is intended to replace the existing SRF 550.2 form or if both forms would be produced in parallel, given the clear overlap between these returns.	26
33	SRF 550.4	APRA to clarify whether collateral needs to be apportioned between securities for each counterparty/account or whether APRA could explore collecting collateral information at the counterparty level in a separate table to better align with how collateral is managed.	26
34	SRF 332.1 Table 1	APRA to clarify in more detail the 'Investment Average Market Value Amount' definition and over what period this average should be taken. APRA also to clarify expectation of alignment of this table to either the SRF 332 Table 3 entries or to RG97 reporting.	27

## APRA CONNECT

We suggest that APRA aims to have draft outputs for each of the SDT Phase 2 returns in the APRA Connect Test environment shortly after the final standards are released. This will provide RSE's and APRA reporting system providers sufficient time to test the new form outputs and ensure that all the outputs align with APRA's validation rules and the underlying reporting standard whilst also working through any bugs or issues that could arise.

## AVAILABILITY OF DATA AND EFFORT

We note that the number of unique forms being introduced (18) exceeds the number of existing returns with comparative data to the new standards (6). This net increase of 12 returns, as well as the initial period we expect these returns to run in parallel, will significantly increase the cost for us to complete these returns. There are also instances of existing annual returns being replaced with new quarterly returns, which will also increase compliance activities and cost and will likely require in the short-term additional staff to prepare, review, and submit these regulatory returns.

UniSuper's longer-term plan to ensure ongoing compliance with the SPS 310 External Audit Matters is to leverage automation and uplift data governance. UniSuper will be implementing an automated platform over the next 12 – 18 months to support the preparation and lodgement of regulatory returns. Work on UniSuper's Modern Data Platform has also commenced, which is expected to increase automation, reduce the volume of manual work and improve our data lineage capabilities over the next 24 months. We also note that as per APRA's transformation timeline, there will be a release 2 and 3 of the SDT Phase 2 project from APRA in the next 2 years which we will also need to consider for future plans in relation to resourcing, technology, and data governance requirements.

The availability of data and effort varies across each form and table and is mostly dependent on the data sources identified. The highest concentration of work effort has been identified in SRF 533.1 Unlisted Exposures return, with the elevated effort primarily associated with the potential 'look-through' reporting requirement. Constant communication between both reporting, investment teams and our external managers would be required to populate reliable and accurate look-through data relating to external fund managers valuations, valuation methods and the proportion of underlying assets that have been revalued. This would be a significant administration burden not only on us, but also with our external managers, with the costs associated with such activities significantly higher than the benefit that collection of this data provides.

In the spirit of the stewardship that UniSuper provides to its members, and based on our review of these proposed reporting standards - we are concerned that increasing the compliance burden on our external managers and master custodian could increase costs, which will ultimately be borne by our members. The relationship between comprehensive compliance and good governance requires thoughtful consideration and balance in terms of the costs versus benefit to members. Our detailed feedback and recommendations are covered in more detail in [Appendix 2](#).

## **SUNSET DATES**

To ensure an efficient adoption of Phase 2 reporting requirements and to minimise duplication, we request clear retirement dates for the existing APRA reporting forms that have a clear overlap with the SDT Phase 2 reporting standards; with these retirement dates announced in conjunction with the release of the final SDT Phase 2 Release 1 reporting standards in September 2024.

As experienced as part of the SDT Phase 1 implementation, the duplication of reporting and the persistence of parallel Stronger Super reporting for an extended period of time (sometimes longer than 2 years) placed additional pressure on resources and reduced the ability and capacity we had to focus on automating and future proofing SDT Phase 1 outputs. We note as part of the Economic and Financial Statistics (EFS) program for the banking industry, these sunset dates for existing forms were agreed upon prior to the new reporting standards becoming active. Having these times set can allow us to more effectively allocate resources and plan for the transfer of these returns into BAU teams. See [Appendix 1](#) for our recommendations.

## **BUSINESS DAY REPORTING**

In line with EFS and banking reporting standards, we recommend that APRA amend SDT Phase 2 reporting standards plus the existing SDT Phase 1 reporting standards to business day reporting instead of calendar day reporting. Particularly around the January and April periods where there are several public holidays, UniSuper and our trustees are placed under a high level of pressure and strain to produce highly accurate and reliable reporting in a condensed timeframe due to the current calendar day reporting deadlines. Shifting the reporting requirements

to a business day timeline will allow us sufficient time to more heavily analyse and scrutinise the reporting outputs, which will help to reduce errors, improve data reliability, and should reduce the number of resubmissions funds complete as a result. We understand the challenge of this given state based public holidays but note that the two reporting periods with the most public holidays (January and April) are impacted by federal public holidays. This would also prevent APRA having to provide industry wide extensions for certain reporting periods like that completed for the January 2024 reporting period and could also ease the burden that has been seen on APRA Connect during peak reporting periods, providing benefit and potentially reducing costs for APRA in the future.

## **DUPLICATION OF DATA AND PUBLICATIONS**

It is noted that several returns proposed use data that is available but in a different format than APRA have requested as part of this consultation and the pilot data collection. Where there are instances of this, we would request that APRA, where possible can align their data collections to what is already available as this will reduce the administration burden of having to maintain multiple sources of the same data in similar formats and could also reduce the cost of ongoing compliance.

This is particularly relevant in this collection in both the Liquidity Supply reporting and Fair Value Hierarchy reporting. As is noted in our detailed responses in [Appendix 3](#), APRA should consider whether internal liquidity reporting already generated can be leveraged to populate the returns they have requested, and outputs that are specifically generated by our custodian as part of the SRF 550 Asset Allocation collection be removed. This will help ensure a reduction in the number of datasets and outputs that are used strictly for APRA reporting purposes and that have limited usefulness internally. Enabling this liquidity reporting to be generated from an existing source will also reduce the ongoing compliance cost that would otherwise have been associated with this reporting, as we expect a separate APRA liquidity reporting return would have to be created in conjunction with our custodian (as the existing SRF 550.0 classifications would need to be reported). This increased compliance cost both internally and externally for our custodian will ultimately be borne by our members, and we would question whether liquidity reporting using APRA specific classifications will offer significant benefit to cover this cost increase.

We also note in [Appendix 3](#) that for Fair Value Hierarchy reporting, where possible this should align to what we produce as part of our annual financial statement process. The return in its current format uses APRA specific classifications based off the SRF 550 Asset Allocation series of returns that would require our custodian to create an additional fair value hierarchy output specifically for APRA reporting. We would question the benefit of introducing this additional output when we could be able to utilise the existing fair value hierarchy report that is used in our annual financial statements.

## **REQUEST FOR REVIEW**

We would like to request from APRA that there is a review session on the pilot data submissions provided by funds to address any further questions both funds or APRA may have and to get any further clarification from APRA on certain reporting items as required. This could occur in the period between the pilot data and consultations being submitted in March/April and the expected release of the final standards in quarter 1 of Financial Year 2025 and will help us better prepare for the release of the final reporting standards towards the end of the calendar year.

## Appendix 1: Sunset Dates

The below table summarises the existing forms that were identified by APRA as having a clear overlap with the forms that are expected to be introduced as part of SDT Phase 2 Release 1. The 'Expected Final Reporting Period' column below is the final reporting date we would reasonably expect to still be completing these forms, which covers a minimum of 9 months (3 submissions) for quarterly returns and 12 months (2 submissions) for annual returns.

SDT Phase 2 Return			Existing Form			Expected Final Reporting Period
Code	Name	Frequency	Code	Name	Frequency	
SRF 604.0	RSE Licensee Profile	Annual	SRF 001.0 Part A	Profile and Structure	Annual	30/06/2025
			SRF 600.0	Profile and Structure (RSE Licensee)	Annual	30/06/2025
SRF 607.0	RSE Business Model	Quarterly	SRF 001.0 Part B	Profile and Structure	Annual	30/06/2025
Table 1	RSE Sub-Fund		SRF 601.0	Profile and Structure (RSE)	Annual	30/06/2025
Table 2	RSE Composition		SRF 700.0 Part B	Product Dashboard	Annual	30/06/2025
SRF 605.0 Table 5	RSE Structure	Quarterly	SRF 001.0 Part C	Profile and Structure	Annual	30/06/2025
SRF 553.0	Investment Exposure Concentrations and Valuations	Quarterly	SRF 532.0	Investment Exposure Concentration	Quarterly	31/03/2025
SRF 552.0	Securities Subject to Repurchases and Resale and Securities Lending and Borrowing	Quarterly	SRF 721.0	ABS Securities Subject to Repurchase and Resale and Stock Lending and Borrowing	Quarterly	31/03/2025
			SRF 535.0	Securities Lending	Annual	30/06/2025
SRF 550.0	Derivative Transactions	Quarterly	SRF 722.0	ABS Derivatives Schedule	Quarterly	31/03/2025



## Appendix 2: Data Availability and Estimated Effort to Complete per Table

Please note the below tables are our internal estimations of the availability of the data in its current format, as well as the identified expected effort to complete on an ongoing basis once reporting is required from October 2025. The effort to complete is assuming a fully automated future solution and does not include any estimations of the effort and time required to build the returns or source any new data outputs that are currently not available. Further estimations on the effort to complete the build of these returns will be made once the final reporting standards are made available in September/October 2024. We expect at least 4 full time resources will be required to prepare and review the builds of these returns as well as significant internal resources within our investment team to provide and review the inputs we will be submitting.

### KEY FOR THE BELOW TABLE

<b>^Data Availability</b>	<b>Definitions</b>
Available	All data currently Available
Mostly Available	Most data available with a few additional new inputs required
Partially Available	Only part of the data is currently available, with several additional new inputs required
Not Currently Available	Not Currently readily available
Not Applicable	No Data Required

<b>*Effort to Complete</b>	<b>Definition</b>
Not Applicable	No Reporting Required
Low	under 2 days to complete once part of BAU
Low to Medium	2 to 3 days to complete once part of BAU
Medium	3 to 5 days to complete once part of BAU
Medium to High	5 to 7 days to complete once part of BAU
High	7 to 10 days to complete once part of BAU
Very High	over 10 days to complete once part of BAU

**NEW REPORTING STANDARDS:**

Form Information		Table Information		Frequency	^Data Availability	*Effort to Complete	Comments
Code	Name	#	Name				
553.0	Material Exposures	1	Directly Held Listed and Liquid Unlisted Exposures	Quarterly	Available	Low to Medium	All data currently available in current custodian data extracts
553.0	Material Exposures	2	Indirectly Held Listed and Liquid Unlisted Exposures	Quarterly	Mostly Available	Low to Medium	Most data currently available in custodial data extracts, redemption availability will need to be sourced via external managers for liquid unlisted exposures.
553.1	Unlisted Exposures	1	Directly Held Unlisted	Quarterly	Mostly Available	Medium	Most data is available in current custodian extracts with valuation inputs required from our internal Investments teams.
553.1	Unlisted Exposures	2	Indirectly Held Unlisted	Quarterly	Partially Available	Medium to High	Some data is available in current custodial extracts. Multiple inputs are not readily available with further clarification provided in Appendix 1.
553.1	Unlisted Exposures	3	Indirectly Held Unlisted Valuations	Quarterly	Partially Available	Medium to High	Some data is available in current custodial extracts. Multiple inputs are not readily available with further clarification provided in Appendix 1.
553.2	Investment Vehicle and Country Exposures	1	Investment Exposures	Quarterly	Mostly Available	Medium	This return would require a high level of manual manipulation due to the use of the 'Investment Menu' and 'Investment Product' fields. These fields exist within our administration system, but not within our custodial system as covered in Appendix 1.
553.2	Investment Vehicle and Country Exposures	2	Investment Vehicle Exposures	Quarterly	Mostly Available	Low to Medium	Will require several new internal inputs relating to internally managed investment vehicles.
553.2	Investment Vehicle and Country Exposures	3	Country Exposures	Quarterly	Available	Low	Data already available in existing extracts. Could the region of exposure and country instead be added to the 550.1 RSE Allocation return to prevent a potential double up of form generation?
553.3	Valuations	1	Out of Cycle Valuations	Quarterly	Available	Low to Medium	Do not expect to be frequently completed for UniSuper due to infrequency of such valuations.
553.3	Valuations	2	Fair Value Hierarchy	Annual	Available	Low to Medium	Outputs are available in existing reports, we will need to combine the logic in our APRA reporting with that in our fair value hierarchy but that should be feasible.
553.3	Valuations	3	Investment Option Valuation Approach	Annual	Available	Low	Most of the values in the return will remain fixed.
551.0	Liquidity Supply	1	Liquidity Profile	Quarterly	Not Currently Available	Medium	APRA to provide more concrete definitions and examples of the 'redeemable for cash' buckets and how funds are expected to populate these outputs. These can then be communicated back to custodians for the future state build.
551.0	Liquidity Supply	2	Investment Option Liquidity Profile	Quarterly	Partially Available	Medium	See above comments.
551.0	Liquidity Supply	3	Available Liquid Assets within 3 days	Quarterly	Not Currently Available	Medium	See above comments.
551.0	Liquidity Supply	4	Investment Option Available Liquid Assets within 3 days	Quarterly	Not Currently Available	Medium	See above comments.

551.1	Liquidity Demand	1	Cash Flows	Quarterly	Partially Available	Low to Medium	We can leverage the existing daily cashflow processes for this form. We see difficulty reporting investment cash flows at a product level as the products exist in the administration system but not within our custodian's system.
551.1	Liquidity Demand	2	Investment Option Cash Flows	Quarterly	Partially Available	Low to Medium	We can leverage the existing daily cash flow processes for this form. We see difficulty reporting investment cash flows at a product level as the products exist in the administration system but not within our custodian's system.
551.1	Liquidity Demand	3	Foreign Currency Contracts Outstanding	Quarterly	Available	Low to Medium	Detailed logic needs to be in place over our fund level valuations to produce this reporting. Once this is built the preparation and review effort should remain low to medium.
551.1	Liquidity Demand	4	Member Switching Transactions and Applications/Redemptions	Quarterly	Available	Low to Medium	We will require some minor amendments to our existing cash flow process. After we have created custom mapping for the different transaction types, we see no issues populating this form as designed.
551.2	Liquidity Event And Other Indicators	1	Liquidity Event Trigger Metrics or Indicators	Quarterly	Available	Low to Medium	One suggestion to update the 'Liquidity Metric or Trigger' field to allow for a 'Total Option Outflow' field as this better aligns with our internal policy
551.2	Liquidity Event And Other Indicators	2	Investment Options Exceeding Liquidity Trigger Metric	Quarterly	Available	Low to Medium	One suggestion to update the 'Liquidity Metric or Trigger' field to allow for a 'Total Option Outflow' field as this better aligns with our internal policy
551.3	Estimated Order of Asset Liquidation	1	Estimated Order of Asset Liquidation Under Liquidity Stress Condition	Ad hoc	Not Currently Available	Medium	APRA needs to clarify under what stress conditions this reporting is supposed to be completed and at what level asset liquidation needs to be specified (i.e. asset level or asset class level).
340.0	RSE Licensee Financial Statements	1	Statement of Income	Annual	Available	Low	All data currently available in our accounting system and this can be completed in parallel with the Trustee Financial Statements.
340.0	RSE Licensee Financial Statements	2	Statement of Financial Position	Annual	Available	Low	All data currently available in our accounting system and this can be completed in parallel with the Trustee Financial Statements.
340.0	RSE Licensee Financial Statements	3	Statement of changes in equity	Annual	Available	Low	All data currently available in our accounting system and this can be completed in parallel with the Trustee Financial Statements.
340.0	RSE Licensee Financial Statements	4	Related Party Transactions	Annual	Available	Low	All data currently available in our accounting system and this can be completed in parallel with the Trustee Financial Statements.
552.0	Repos and Securities Lending and Borrowing	1	Repos and Securities Lending and Borrowing	Quarterly	Partially Available	Low to Medium	Data is mostly available within custodial data extracts with a few of the additional columns being investigated.
552.0	Repos and Securities Lending and Borrowing	2	Securities Lending	Quarterly	Partially Available	Low to Medium	Data is mostly available within custodial data extracts with a few of the additional columns being investigated.
552.0	Repos and Securities Lending and Borrowing	3	Reinvestment of Cash Collateral from Securities Lending	Quarterly	Partially Available	Low	Data is mostly available within custodial data extracts with a few of the additional columns being investigated.
604.0	RSE Licensee Profile	1	Governing Rules	Annual	Available	Low	No comments
604.0	RSE Licensee Profile	2	Ownership Structure	Annual	Available	Low	No comments
604.0	RSE Licensee Profile	3A	Directors	Annual	Available	Low	A few minor changes request in Appendix 1.
604.0	RSE Licensee Profile	3B	Directors - Other Directorships	Annual	Mostly Available	Low	A few minor changes request in Appendix 1.
604.0	RSE Licensee Profile	3C	Directors - Other Employment	Annual	Mostly Available	Low	A few minor changes request in Appendix 1.

604.0	RSE Licensee Profile	4	Board and Board Committees	Annual	Available	Low	We expect to utilise our annual financial statements for this table.
604.0	RSE Licensee Profile	5	Attendees of Board and Board Committee Meetings	Annual	Available	Low	We expect to utilise our annual financial statements for this table.
607.0	RSE Business Model	1A	Sub-funds - Promoters	Quarterly	Not Applicable	N/A	No Promoter relationships so this table will be blank.
607.0	RSE Business Model	1B	Sub-funds - Employer Sponsors	Quarterly	Available	Low	A few clarification points are raised in Appendix 1 – particularly where a sub-fund could be identified as both employer sponsored <b>and</b> defined benefit.
607.0	RSE Business Model	1C	Sub-funds - Defined benefits	Quarterly	Available	Low	A few clarification points are raised in Appendix 1 – particularly where a sub-fund could be identified as both employer sponsored <b>and</b> defined benefit.
607.0	RSE Business Model	2	RSE Composition	Annual	Available	Low	No comments
607.0	RSE Business Model	3	PST Investor Information	Annual	Not Applicable	N/A	No PST offerings or products so this table will be blank.
607.0	RSE Business Model	4	MySuper and Choice lifecycle stage factors	Annual	Not Applicable	N/A	No lifecycle offerings or products so this table will be blank.
607.0	RSE Business Model	5	MySuper and Choice lifecycle product mix design	Annual	Not Applicable	N/A	No lifecycle offerings or products so this table will be blank.

### CHANGES TO EXISTING REPORTING STANDARDS:

Form Information		Table Information			Frequency	^Data Availability	*Effort to Complete	Comments
Code	Name	#	Name					
251.4	RSE Profile Insurance Arrangements	1	RSE Profile Insurance Arrangements	Annual	Available	Low	Pending confirmation from APRA that only default insurance arrangements are required to be reported. This would come from the same data source as our SRF 251.1 return, so no issues are expected.	
332.1	Indirect Investment Costs	1	Indirect Investment Costs	Annual	Not Currently Available	Medium	Data is not currently available and would have to be created solely for the purpose of this reporting.	
550.3	Derivative Transactions	1	Derivative Transactions	Quarterly	Partially Available	Low to Medium	Most of the data points are available, we are still investigating some columns with our investment team and our custodian. Also awaiting APRA clarification on the 'Position Type at Transaction' field.	
550.4	Margining & Risk Mitigation for Non-Centrally Cleared Derivatives	1	Margining & Risk Mitigation for Non-Centrally Cleared Derivatives	Quarterly	Partially Available	Medium	Most of the data points are available, we are still investigating some columns with our investment teams and our custodian.	
550.4	Margining & Risk Mitigation for Non-Centrally Cleared Derivatives	2	Aggregate Month-End Notional Amount of Non-Centrally Cleared Derivatives	Annual	Partially Available	Low to Medium	Most of the data points are available, we are still investigating some columns with our investment teams and our custodian.	
605.0	RSE Structure	5	RSE Sub-funds	Quarterly	Available	Low	Underlying data and reporting already available.	
606.0	RSE Profile	5	RSE Sub-funds And Products	Quarterly	Available	Low	Underlying data and reporting already available.	

## Appendix 3: Specific Form Feedback and Recommendations

### NEW FORMS

#### SRF 551.0 LIQUIDITY

<i>Summary reference</i>	<i>Form and table</i>	<i>Feedback</i>	<i>Recommendation</i>
1	SRF 551 Liquidity Collection	For the overall Liquidity collection, we would request APRA to provide more information on what this data will be used for. The way this data will be used and its significance as a monitoring tool would heavily impact how this series of forms are built and populated.	APRA to provide more information on the purpose of this reporting, whether it is to compare the liquidity practices across funds, or to ensure ongoing compliance with SPS 530 and/or others.
2	SRF 551.0 Liquidity Supply	<p>We have found that some concepts introduced in the Liquidity collection are unclear and open to interpretation. Without further guidance through either FAQs, detailed worked examples, or better definitions, it will be very hard for funds to produce data that is comparable, which is particularly relevant with the 'Redeemable for Cash' field. We would request APRA provide more guidance on this field and whether the expectations are that the outputs for this field are driven off more general asset class sector and listing outputs or whether these classifications should be completed at an individual asset/security level. Whilst completing these at a more general level would be a simpler exercise, it would not align with how this is done internally and would create outputs that are used exclusively for APRA reporting purposes. However, whilst classifying these buckets at a security level would in our view add more value for the RSE, this would be a very administration heavy exercise that would need to be repeated each month to ensure classifications remain up to date and new assets and holdings are also adequately classified prior to submission dates (we currently hold over 4,500 individual securities as a fund).</p> <p>As an example of where we see the ambiguity in how to populate this output, many funds including UniSuper hold significant stakes in Australian listed equities such as Transurban, Origin and others. Although these are all highly liquid listed equity stocks which are readily tradeable on a daily basis, to liquidate the significant shareholding that some funds will hold in totality would almost certainly take over 90 days. That is not to say that these represent illiquid holdings though as certain portions could be easily sold daily, and the period with which they are redeemable for cash would also depend on how big a haircut a fund would be willing to take to liquidate an asset. This could lead to funds with similar holdings in certain equities which they hold large stakes in being classified differently depending on each funds' interpretation of this reporting standard. Another example, generally the market</p>	APRA to provide more guidance on the 'redeemable for cash' definition alongside some detailed worked examples for how the major asset classes should be classified (i.e. listed equity).

Summary reference	Form and table	Feedback	Recommendation
		<p>considers government bonds to be a very liquid holding, however in scenarios like the Global Financial Crisis they became very illiquid and hard to trade.</p> <p>Without further clarification guidance and worked examples on what APRA expects funds to populate within each bucket of the 'redeemable for cash' column it will be near impossible for funds to provide reliable and easily comparable data to APRA given each fund will produce their own custom logic. We would request APRA provide some clear examples and guidelines of what type of securities they would expect to appear in each bucket or provide clear definitions for each individual bucket so funds can collaborate with custodians to produce reliable and comparable data.</p>	
3	SRF 551.0 Liquidity Supply	<p>All existing liquidity reporting is completed using the Investment Book of Record (IBOR) and daily fund valuation files rather than the Accounting Book of Record (ABOR) and the hard close valuation files that are used to populate quarterly APRA reporting and financial statements. Currently, the SRF 551.0 return includes several columns (such as additional asset characteristics) that are present within the SRF 550 series of returns that can only be sourced using the accounting book of record as they do not exist within the Investment Book of Record. As such, if liquidity reporting is required to have classifications and values that align with the SRF 550 series of returns, internal liquidity reporting would have to be completely repurposed just to complete this reporting. This would lead to a high volume of work required for both funds and custodians to modify current internal reporting to match APRA definitions and characteristics using hard close custodian data. The final reporting would have no use internally as the classifications that are used internally are not aligned with APRA reporting classifications. As such we would suggest that APRA explore removing the columns from the SRF 551.0 that come from the SRF 550 series of returns. This could enable funds to leverage internal liquidity reporting for these returns, decreasing the complexity of designing this return for both funds and their custodians, as internal reporting and datasets could be more easily repurposed to complete this reporting.</p> <p>Also, the proposed ad hoc nature of this report would be very difficult to complete using the accounting book of record as these are only closed off at the end of each end. Aligning this reporting to the investment book of record would more easily enable funds to meet the ad hoc requirements of this form when required, whilst also reducing the complexity of the build and ensuring that less reporting is produced solely for the purpose of APRA reporting.</p>	APRA could consider whether funds could complete this reporting using daily Investment Book of Record outputs instead of month end Accounting Book of Record outputs.
4	SRF 551.1 Liquidity Demand	For the tables within SRF 551.1 relating to member flows (Net Members Benefits Flows and Switching), we foresee no issues sourcing the data required at a product and option level as both these outputs exist within the member administration systems. This data is already available and used as part of UniSuper's daily cashflow process, and with a few minor tweaks and changes we see no issues being able to produce this reporting on a quarterly	We would suggest APRA consider splitting both Table 1 RSE Cash Flows and Table 2 Investment Option Cash Flows into 2 separate tables as covered below.

Summary reference	Form and table	Feedback	Recommendation										
		<p>basis. However, similarly to the points raised under the ‘SRF 553.2 Table 1’, completing reporting on investments cash flows (e.g. Derivative Margining and Physical FX Settlements) at a product level is not possible without a high degree of manual manipulation of the data. Investment cash flow items will come predominantly from our custodian, who do not have a view of product within their system and only have a view of whether a transaction is linked to the Taxed (Super and TTR) or Untaxed (Pensions) portion of each option. The only way to report these investment cash flows at a product level is by using the SRF 606 return for the period to apportion the values between the underlying products. This would create unnecessary manual processes for funds, particularly as the SRF 606 return is required to be reviewed and completed prior to this return being finalised.</p>	<table border="1"> <thead> <tr> <th data-bbox="1525 212 1731 256">Return</th> <th data-bbox="1731 212 2145 256">Suggested Table</th> </tr> </thead> <tbody> <tr> <td data-bbox="1525 256 1731 373">SRF 551.1 Liquidity Demand</td> <td data-bbox="1731 256 2145 373"><b>Table 1</b> – RSE Member Cash Flows</td> </tr> <tr> <td data-bbox="1525 373 1731 456"></td> <td data-bbox="1731 373 2145 456"><b>Table 2</b> – RSE Investment Cash Flows</td> </tr> <tr> <td data-bbox="1525 456 1731 539"></td> <td data-bbox="1731 456 2145 539"><b>Table 3</b> – Option Member Cash Flows</td> </tr> <tr> <td data-bbox="1525 539 1731 620"></td> <td data-bbox="1731 539 2145 620"><b>Table 4</b> – Option Investment Cash Flows</td> </tr> </tbody> </table> <p>For Tables 1 and 3 suggested above, given the product identifiers as reported in the SRF 605 and SRF 606 are present within the administration system, these could continue to be reported as per the proposed standard. For Tables 2 and 4, to prevent overly manual apportionment methodology being used, we would suggest that instead of using ‘Product Phase Type’ that a ‘Taxed Type’ columns with enumerations of ‘Taxed’ and ‘Untaxed’ are used. This will enable funds to ingest data directly from the custodian without the requirement of the overly manual processes and apportionment covered above.</p> <p>Alternatively, APRA could keep the current structure of the returns but specify within the reporting standard that investment cash flows are only required to be reported under the ‘Accumulation’ or ‘Pension’ product phase types to align more closely with how investment cash flows are viewed internally.</p>	Return	Suggested Table	SRF 551.1 Liquidity Demand	<b>Table 1</b> – RSE Member Cash Flows		<b>Table 2</b> – RSE Investment Cash Flows		<b>Table 3</b> – Option Member Cash Flows		<b>Table 4</b> – Option Investment Cash Flows
Return	Suggested Table												
SRF 551.1 Liquidity Demand	<b>Table 1</b> – RSE Member Cash Flows												
	<b>Table 2</b> – RSE Investment Cash Flows												
	<b>Table 3</b> – Option Member Cash Flows												
	<b>Table 4</b> – Option Investment Cash Flows												
5	SRF 551.1 Liquidity Demand	For the ‘Member Switching’ cash flow type, it is unclear whether this should include movements between products. This can occur when a super member moves into the pension or transition to retirement product via a pension purchase or when a defined benefit member moves into the accumulation product.	APRA to consider adding an additional ‘Cash Flow Type’ enumeration for ‘Product Transfers’ to capture the Member Cash Flow movement of funds between products.										

Summary reference	Form and table	Feedback	Recommendation
		<p>Internally 'Member Switching' is defined as switching between options within the same product types (i.e. a super member moving between options within the Accumulation product). At a product level all member switching nets to zero and movements between products would be seen as 'Transfers'.</p> <p>As such APRA should clarify whether product switches/transfers should be captured within the 'Member Switching' or 'Net Members' Benefits Flows' cash flow types or whether they would consider adding in an additional cash flow type enumeration to include 'Product Switches'. We would see this as a key item of interest to APRA given it would provide separate line items on the value of member flows between the Accumulation and Retirement Phase at both an RSE and option level.</p>	
6	SRF 551.2 Liquidity Event Trigger Metrics of Indicators	<p>As part of the pilot data collection, we have classified several of our trigger metrics as 'Member Outflows' but note that as per our liquidity policy this also includes member switching as well as some elements of investment cash flows (such as currency hedging liabilities). We would suggest APRA explore including a broader 'Total Option Outflows' trigger/metric given that will most closely align with our internal policy, otherwise we can continue to report these as 'Member Outflows' once this reporting is live and include a note with column 9 'Description of the Liquidity Trigger Metric or Indicator' field that this includes member switching and currency hedging liabilities.</p>	<p>We suggest APRA look at including an additional enumeration under the 'Liquidity Trigger or Indicator' column that includes 'Total Option Outflows' to better align with our internal liquidity policy and metrics.</p>
7	SRF 551.3 Estimated Order of Asset Liquidation	<p>The requirement in this return to report the estimated order of liquidation at an asset level is not aligned with internal reporting and would present a significant and ongoing manual administration exercise if required by funds. This level of reporting on liquidation is far too specific and granular and instead APRA should explore whether this could be done at a strategic asset class, listing and domicile level using the SRF 550.0 strategic asset allocation data as a basis. This would enable the data to be sourced internally and use existing internal reporting as a base, rather than a new output be created solely for APRA reporting. The current structure of this return is also not representative of how liquidity is managed. Columns 2-6 of this return should be removed and replaced with 3 columns covering 'Investment Sector Type', 'Investment Domicile Type', 'Investment Listing Type' and an additional column of 'Additional Sub Asset Type' where we could specify the sub class of fixed income/cash that would be included in that group.</p> <p>APRA should also consider that we would not entirely liquidate one specific asset sub class at once (i.e. by a strict order of liquidation). We would instead sell multiple different types of</p>	<p>APRA should remove the requirement to report the estimated order of liquidation at an individual asset level as this is not reflective of how such scenarios would be treated internally. Instead, APRA could collect this information at a sub asset class level (i.e. combination of asset class, asset listing, asset domicile and some additional characteristics).</p>



Summary reference	Form and table	Feedback	Recommendation
		assets at similar times (for example to ensure SAA ranges are maintained) in a much more dynamic fashion. The reporting of an 'order' in this return should not be taken to suggest that the entire holdings of an asset sub class would be liquidated before other holdings would also be partially liquidated.	

### SRF 553.0 INVESTMENT EXPOSURE CONCENTRATIONS AND VALUATIONS

Summary Reference	Form and Table	Feedback	Recommendation
8	SRF 553.0 Material Exposures	<p>We note the similarities between this reporting standard and the existing SRF 532.0 Investment Exposure Concentrations standard, with the major difference being the introduction of an arbitrary \$50m threshold for reporting vs the existing 1% of total investments threshold in SRF 532.0. In our draft analysis for June 2023 this would result in an additional 245 securities being in scope for table 1 (vs 13 reported in SRF 532.0 Table 1) and 16 in scope for table 2 (vs 2 reported in SRF 532.0 Table 2.1). This arbitrary threshold will disproportionately affect larger funds, with increased administration burden and compliance costs expected with the increase scope of securities that will be captured not providing sufficient benefit.</p> <p>We also note the new reporting outputs in columns 22 and 23 on 'Redemption Frequency' and 'Restricted Redemptions', which we expect we will not be able to populate without the assistance of the external managers holding the investments. There will also be examples in this table where the 'Redemption Frequency' is not applicable, so APRA should also explore adding a 'Not Applicable' enumeration to this output. Once the final reporting standards are released, funds and custodians may need to explore if information on redemptions can be added by our external fund managers to the data provided to external parties such as Clearstream and Morningstar for APRA Look-through purposes.</p> <p>Broadly our view is that this reporting standard will mostly draw upon data already available as part of funds existing SRF 532 and SRF 550 reporting, so the build effort and difficulty would be low to medium.</p>	<p>We would suggest not using an arbitrary dollar threshold for this return and instead explore alternative methods that better align with how we view materiality internally. Our preferred method would be:</p> <ul style="list-style-type: none"> <li>- Requiring reporting of the top 20 directly held and top 20 indirectly held listed exposures above \$50m.</li> </ul> <p>Other thresholds that would be a significant improvement on an arbitrary \$50m would be:</p> <ul style="list-style-type: none"> <li>- Using a threshold of the greater of 0.5% of FUM or \$50m.</li> <li>- Having only a percentage threshold of either 0.25% or 0.50% of FUM.</li> </ul> <p>The threshold in its current format would produce a very high administration burden on us and disproportionately affect larger funds. Modifying the threshold by one of the methods listed above will help ensure that the administration component of this reporting on an ongoing basis remains relatively low whilst also providing APRA with significantly more granular information.</p>

Summary Reference	Form and Table	Feedback	Recommendation
9	SRF 553.1 Unlisted Exposures – All Tables	In this table we would challenge APRA’s separation of table 2 and table 3 of the SRF 553.1 returns into directly held and indirectly held assets. We do not view this as the most relevant approach, given some assets that funds hold are flagged as ‘Indirectly Held’ but are held by internally managed Special Purpose Vehicles with the assets valued in line with directly held assets. As has been raised during the workshops held with industry in February 2024, a better consideration of how unlisted assets are valued and managed is whether they are internally managed or externally managed as the valuation policies and processes align much more closely in these instances. However, it is also worth considering that there are instances where material indirectly held assets are still independently valued by the RSE on a case-by-case basis, and Tables 2 and 3 of the SRF 553.1 return should be adjusted to allow for such entries and not assume all indirectly held or externally managed investments are valued by external Investment Managers.	<p>We would suggest APRA modify the structure of these tables to better align with how unlisted investments are valued and reviewed by funds. The 2 tables should instead be for ‘internally managed investments’ and ‘externally managed investments’ with a definition suggested below. This is much better aligned with how those assets are valued and reviewed by funds, as for example assets held by SPV’s would be reported in the ‘indirectly held’ table, whilst their valuation practices and processes would be much more closely aligned to those for the ‘directly held’ investments.</p> <p>The draft definitions of ‘Internally Managed’ and ‘Externally Managed’ could align with the existing guidance on these terms within the Portfolio Holdings Disclosure.</p>
10	SRF 553.1 Unlisted Exposures Table 1 Directly Held - Unlisted Investments	We note that this return has similarities to the SRF 553.0 material exposures return but covers unlisted assets as specified in the instructions. We note also that unlike in SRF 553.0 there is no minimum dollar value or % threshold for reporting in this return. The absence of such a threshold would create a very high level of administration burden on funds to ensure the accuracy of all the lines reported. From our pilot data submission, over 70% of the holdings we would be required to report in this return would be under \$10m, which represents less than 0.01% of UniSuper’s current assets under management and would not be considered a material holding at either a fund or option specific level.	<p>We would suggest that APRA align the thresholds between the SRF 553.0 and the SRF 553.1 returns to ensure that data is reported on the more material unlisted holdings whilst reducing the significant ongoing administration burden that would exist if there were no threshold introduced in this reporting.</p> <p>We would suggest the implementation of a threshold that is the same as for the SRF 533.0 and requires reporting of the top 20 directly held unlisted investments over \$50m.</p>
11	SRF 553.1 Unlisted Exposures Table 1 Directly Held - Unlisted Investments Table 2 Indirectly Held - Unlisted Investments	We note that the ‘Proportion of Assets Revalued This Quarter’ for directly held assets would always either be 0% or 100%, because the reporting is at an asset level (i.e. ISIN). We have no directly held holdings that may have portions of them revalued and they would always be revalued as a whole.	We would suggest that instead of having a percentage in the field of ‘Proportion of Assets Revalued This Quarter’ that there is a simple ‘Yes’ or ‘No’ option for ‘Asset Revalued This Quarter.’

Summary Reference	Form and Table	Feedback	Recommendation
12	SRF 553.1 Unlisted Exposures Table 1 Directly Held - Unlisted Investments	We note that it is common that funds will hold unlisted assets within portfolios that have a listed strategic listing type. This may occur with holdings in companies that are subject to liquidation proceedings, whilst other holdings may be shares in companies which are pre-IPO (with the expectation of an imminent IPO) or companies that were once listed but are now unlisted. These assets are valued on a case-by-case basis, with the frequency depending on available information and materiality of the investment. Without a materiality threshold on this return, this would put a very high administration burden on funds to populate all the required fields whilst for some holdings they may simply be Not Available or Not Applicable. As per Note 8 of UniSuper's 2023 Annual Report, delisted equity securities are valued based on the last sale price prior to delisting, or where subject to liquidation, the amount the fund expects to receive on wind up so are not all formally valued or covered by our Valuation Policy.	We would suggest that APRA amend the requirements for this table to require reporting only for Unlisted assets held within portfolios that have an unlisted strategic listing type (as reported in the SRF 550.0).
13	SRF 553.1 Unlisted Exposures Table 2 Indirectly Held - Unlisted Investments	We foresee no issues completing the first 13 columns of this return as these rely on data which is already readily available. Where we do see issues is for columns 14 and onwards, as this is new data that has not previously been sourced and is mostly not available to RSEs. A lot of these outputs will rely on inputs provided by fund managers, particularly for column 19 'Proportion of Assets Revalued This Quarter'. Funds will have limited to no visibility of when the assets of an underlying fund/trust that is externally managed are completed, they will mostly just see a unit price and market value as part of the unit pricing/crediting rate process. To populate this output, funds would need to further rely on look-through data provided by fund managers to Clearstream to understand how the underlying assets have been valued and whether this has changed from the prior period. We also will have some international holdings where look-through data is not readily available, and it is unclear in this case how trustees could determine the proportion of underlying assets within a fund have been revalued.	We would recommend that APRA restricts this table to just the SPV's or trusts that are a related connected entity to the fund, where valuation information will be much more readily available.
14	SRF 553.1 Unlisted Exposures Table 2 Indirectly Held - Unlisted Investments	The dates of most recent audit assessments and the exceptions noted within this assessment for externally managed funds is also not something that is readily available to Trustees and would need to be covered as an additional input that fund managers provide look-through data providers.	We would suggest that APRA consider changing 'Date Of Latest External Audit Assessment' to 'Frequency Of External Audit Assessment.'
15	SRF 553.1 Unlisted Exposures Table 2 Indirectly Held - Unlisted Investments	We also seek clarification on whether funds are expected to include any informal reviews within the "Review Of Investment Manager Valuation Practice" field. Our Internal Investment team regularly reviews Investment Manager's fund valuation reports and meet with external fund managers regularly, but this does not necessarily constitute a formal review of their valuation policies.	APRA to provide more clarity on what type of reviews constitute the 'Review Of Investment Manager Valuation Practice' field.

Summary Reference	Form and Table	Feedback	Recommendation
16	SRF 553.1 Unlisted Exposures Table 3 Indirectly Held – Unlisted Investments (Valuation)	<p>We foresee no issues completing the first 14 columns of this table as it draws of data which is already available to funds as part of SRF 550.0 and the underlying valuations file which make up these values. However, similarly to the above we see significant issues sourcing information on the proportion of assets in an underlying fund that have been revalued in the quarter as well as information around the valuation cycle, valuation type and valuer name and approach for these assets. Trustees would not have access to this information for externally managed investments and it would be the fund manager who would have to provide this information. Particularly for larger funds that encompass large numbers of separate unlisted assets, this could require the fund managers to provide the names of every underlying valuer as well as their valuation cycle and their method. This would have to be refreshed each period and would put a significant administration burden on external fund managers that are working with Australian Superannuation funds. We would query what the value of this data being provided by superannuation funds would be, as it would be more easily sourced directly from fund managers.</p> <p>We are also concerned whether all this additional information being sourced and provided is in our members best interest, as this will bear a cost component specific to superannuation funds which will ultimately be passed down to members through increased fees and administration costs. We would also not like to see the introduction of any significant administration burdens on external fund managers that could put Australian superannuation funds in a detrimental position versus other international funds and money managers not subject to these stringent external data requirements. We also expect that most of these funds would have an external audit requirement which could provide APRA with comfort that they are being properly valued and have adequate controls and governance in place.</p>	APRA to clarify the look through data requirements of this form, which in our view should be completed on a non-look through basis. Otherwise, requiring funds every quarter to reach out to every external investment manager and collate information on valuers, valuation methods of those valuers, proportion of assets revalued, and others would be a very time-consuming activity.
17 & 18	SRF 553.2 Product, Investment Vehicle and Country Exposures Table 1 Product Investment Exposures	<p>We foresee issues completing this return without a large degree of manual manipulation given this return combines outputs that are sourced from our administration systems (Superannuation Product Identifier and Investment Menu Identifier) with outputs that are available within our custodian's systems (Option Identifier, Internal Investment Identifier etc). Custodians are only able to report on Option level information as a split between Taxed (Accumulation and transition to retirement) and Untaxed (Allocated Pensions and Term Allocation Pensions). To populate this return as it is currently structured, we would have to apportion the value of each asset by option that is available in our custodian data into the Superannuation Product Identifier, Investment Menu Identifier and Investment Option Identifier combinations that are reported in our SRF 606 RSE Profile return in Table 4. We also note that this information is already available at the option level as part of funds Portfolio Holdings Disclosure. Creating a manual apportionment methodology to populate this reporting would be of a high administration burden on funds (particularly for those who</p>	<p>We would suggest the APRA remove the Superannuation Product Identifier and Investment Menu Identifier fields from this return so it can more easily be sourced by funds from their custodian valuations and reduce the level of manual manipulation required.</p> <p>We would also suggest that if APRA's key goal with this table is to isolate the impact of Out of Cycle Valuations (column 6) on individual options, that the return be restricted only to the unlisted investments that have had an out of cycle valuation during the period. This would vastly reduce the number of rows that funds would be required to report and reduce the significant</p>

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
		are self-administered) and in our view would not be a best use of members money given similar existing reporting is already available and published on funds' websites. From our initial analysis and proposed pilot data submission, we would be reporting over 3,400 lines for this individual return.	administration burden that would exist if funds were required to produce this table on a quarterly basis.
19	SRF 553.2 Product, Investment Vehicle and Country Exposures Table 3 Country Exposures	In our view it is unclear why this table is required given it appears to be available in other proposed returns and tables as part of this consultation. Country of Investment is included as a reportable column in SRF 553.0 Tables 1 and 2 covering Listed Exposures and is also a reportable column in SRF 553.1 Tables 1 and 3 covering Unlisted Exposures. We would ask that APRA further analyse whether they can source the Country information they need from these tables rather than introducing a new form and adding an administration burden to funds if the information can be sourced via other returns.	APRA to explore whether the reporting of country of investment is already available within the SRF 553.0 and SRF 533.1 returns, or instead if 'Country of Exposure' reporting could be included as a column within the existing SRF 550.1 Investments return, rather than creating a new return for these outputs.
20	SRF 553.3 Valuations Table 2 Fair Value Hierarchy	We note that the outputs and layouts in this proposed return differ from those that are published annually in our Financial Statements. We also note that the investment asset class sector, domicile, and listing fields are unique to APRA reporting and will differ from the definitions used in the Fair Value Hierarchy reporting in our Financial Statements. For example, listed infrastructure and listed property holdings as defined in our APRA reporting will all be classified as listed equities exposure in our Financial Statements and there will also be differences in definitions of Cash and Fixed Income between the two sets of reporting. This could lead to confusion if this data becomes part of APRA's data publication, as it creates what appears to be a duplicate reporting with our Financial Statements but with different outputs and figures.	APRA to clarify whether they would expect these outputs to align with what are in funds financial statements or if the classifications should align with other APRA submissions on Asset Allocation, to assist in the design process for both funds and custodians. If these outputs are expected to be published in the future, we would suggest that APRA include some wording within the publication clarifying that the Fair Value hierarchy outputs will differ to those in funds' Financial Statements due to the difference in the definitions and logic used in APRA reporting compared to the Annual Financial Statements.

### **SRF 604.0 RSE LICENSEE PROFILE**

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
21	SRF 604.0 Table 3A RSE Licensee Directors	We note the consistencies between this return and the SRF 600.0 RSE Profile and Structure with some new outputs introduced. Broadly we are supportive of the new reporting required as part of this return with a few points that require clarification and would request APRA update.	We would ask wherever 'Title' is requested, and values are fixed, that APRA would include titles such as Professor (Prof) and Emeritus Professor (Emeritus Prof) as these are titles of existing Directors in our SRF 600.0 form.

Summary Reference	Form and Table	Feedback	Recommendation
			We would also request if APRA could clarify where the Director is elected by UniSuper Consultative Committee (Note that the Consultative Committee members are from 37 universities), what would be entered under the 'Name Of Representation' column. Additionally, we would request that APRA clarify where a director is a member representative, whether the input for the 'Name of Representation Entity' entry be 'UniSuper' or be left blank.
22	SRF 604.0 Table 3 RSE Licensee Directors	We would like to make a note that information provided by directors is based on self-disclosure. The fund has limited control over this aspect.	We would like APRA to consider sharing information with other regulators (i.e. ASIC) wherever possible to minimize the duplication in information reported to various regulators. An example of this is the submission of ASIC Form 484 which notifies ASIC within 28 days of an appointment to the board. APRA SRF 520.0 also discloses information on responsible persons. It includes Year of Birth, so we would request that this field be removed.
23	SRF 604.0 Table 3B RSE Licensee Directors – Other Directorships	We note APRA requested feedback on the ad hoc nature of this form. As the fund relies on the Director to notify us of any changes, it may be difficult to disclose within 28 days of the event.	We would suggest that APRA modify the ad hoc requirement of this return to either: - Give funds 28 days to report to APRA once they are notified by the director of any change - Require funds to update all changes within a quarter within 28 days of the quarter end as is done with SRF 605.0 and SRF 251.3.
24	SRF 604.0 Table 3B RSE Licensee Directors – Other Directorships	We note that this table can be completed using our Register of Relevant Duties and Relevant Interests broken down by those linked to all ASX listed and APRA-regulated entities. Whilst we note that the current registers are listed by each regulated industry on the APRA website, we would request for ease of access that APRA make a singular list available to funds for this purpose in an excel format. The current formats require manual manipulation (as they exist on a web page), and a full list would reduce the manual administration effort required to complete this reporting on an ongoing basis.	We would like APRA to make a singular list available to funds in an excel format that covers all APRA regulated entities to reduce the manual administration effort required to complete this reporting on an ongoing basis.

Summary Reference	Form and Table	Feedback	Recommendation
25	SRF 604.0 Table 3C RSE Licensee Directors – Other Employment	We would like to make a note that we can request directors to disclose the information of “where that employment comprises more than 50% of their income or time on a Full Time Equivalent basis”. It can be difficult to assess the income threshold.	We would like APRA to remove the requirement of “50% income” and suggest to just have a “Full Time Equivalent” basis.
26	SRF 604.0 Table 4 Board and Board Committees	Broadly we see no major issues with completing this table, as it will predominantly be derived using data already provided as part of our fund Annual Financial Statements. However as was raised in the workshops APRA held with industry during February, UniSuper and multiple other funds have their Audit Committee combined with the Risk and Compliance Committee to form an ‘Audit Risk and Compliance Committee.’	We would request that APRA consider adding ‘Audit Risk and Compliance Committee’ to the allowable enumerations for the ‘Board Or Board Committee Type’ field to prevent funds from having to input this as an ‘Other Committee.’

**SRF 607.0 RSE PROFILE**

Summary Reference	Form and Table	Feedback	Recommendation												
27	SRF 607.0 Table 1B RSE Sub-funds – Employer-Sponsors	<p>We note the similarities and crossover between this return and the existing SRF 601 return. However, there are some clarifications that we would request APRA provide as part of the final reporting standards. UniSuper has one sub-fund, being that of our defined benefit offering that would be reported in Table 1C. Our Defined Benefit sub-fund is made up of both Super and Index and Lifetime Pension products, all of which have their own Investment Product, Menu and Option identifiers as reported in both the SRF 605.0 and SRF 606.0 returns.</p> <table border="1"> <thead> <tr> <th>Superannuation Product Identifier</th> <th>Investment Menu Identifier</th> <th>Investment Option Identifier</th> </tr> </thead> <tbody> <tr> <td>UNISUPERDBD</td> <td>IMDBD</td> <td>DBDivision</td> </tr> <tr> <td>UNISUPERDBDIP</td> <td>IMDBDPension</td> <td>DBDivision</td> </tr> <tr> <td>UNISUPERCRIP</td> <td>IMDBDPension</td> <td>DBDivision</td> </tr> </tbody> </table> <p>Then within the defined benefit sub-fund we have numerous employer-sponsors being our shareholding universities, so it is unclear in this scenario how the sub-fund should be classified given it is considered as both a ‘Defined Benefit’ sub-fund and an ‘Employer Sponsored’ sub-fund.</p>	Superannuation Product Identifier	Investment Menu Identifier	Investment Option Identifier	UNISUPERDBD	IMDBD	DBDivision	UNISUPERDBDIP	IMDBDPension	DBDivision	UNISUPERCRIP	IMDBDPension	DBDivision	<p>We would like APRA to provide further clarification on the definition of ‘Sub-fund’.</p> <p>We would request clarification from APRA on whether funds in similar scenarios should report their top 20 employer-sponsors within the Defined Benefit sub-fund in Table 1B, as is done on an annual basis in the existing SRF 601.0 return, as the standard reads as if this tab is only for where the sub-fund is ‘Employer Sponsor’.</p> <p>If we are to include our Defined Benefit sub-fund employer-sponsors in table 2, can APRA please advise on what should be populated in the ‘Employer Exit Type’ column, as we do not have any tailored fee and cost arrangements for our employer sponsors (there is one Fee and Cost Arrangement Identifier for all members). APRA should either allow this field to be left blank in such circumstances or include ‘Not Applicable’ within the allowable enumerations.</p>
Superannuation Product Identifier	Investment Menu Identifier	Investment Option Identifier													
UNISUPERDBD	IMDBD	DBDivision													
UNISUPERDBDIP	IMDBDPension	DBDivision													
UNISUPERCRIP	IMDBDPension	DBDivision													

**SRF 552.0 SECURITIES SUBJECT TO REPURCHASES AND RESALE AND SECURITIES LENDING AND BORROWING**

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
28	SRF 552.0 Securities Subject to Repurchases and Resale and Securities Lending and Borrowing	Our custodian has raised concerns with assigning collateral to counterparties at a security level. In practice, collateral is typically maintained at an account level for each counterparty and can be spread across multiple securities. APRA needs to clarify whether the collateral posted or received per account should be apportioned between the securities it relates or grouped up at the total counterparty level. If the apportionment logic is required, that would require significant manual logic to be implemented by both custodians and funds would create an output only used for APRA reporting.	APRA to clarify whether collateral needs to be apportioned between the securities for each counterparty/account.

**SRF 340.0 RSE LICENSEE FINANCIAL STATEMENTS**

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
N/A	SRF 340.0 RSE Licensee Financial Statements	We are supportive of this proposed reporting standard as it draws upon data already produced as part of the Annual Financial Statements for our Trustee entity, with minimal amendments required to those data sources to populate this reporting that comes from our Financial Reporting General Ledger System. We see the build effort being low for this return and support it being completed on an annual basis to align with the current reporting of our trustee entity.	No amendments recommended.



## CHANGES TO EXISTING REPORTING STANDARDS

### SRF 605.0 RSE STRUCTURE

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
29	SRF 605.0 RSE Structure Table 5 RSE Sub-funds	Depending on the outcome of sub-fund reporting in SRF 607.0, this output is reasonable to include as it is currently reported in the SRF 001.0 Part C. However, our DB sub-fund has not changed significantly since 1998 so we would question the benefit of reporting this data quarterly given the lack of historical change.	We recommend that APRA continue to report this information annually, which would be in line with current SRF 001.0 reporting and SRF 605.0 reporting.

### SRF 606.0 RSE PROFILE

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
N/A	SRF 606.0 RSE Profile Table 5 RSE Sub-funds and products	Not required: Where the RSE does not operate multiple sub-funds Table 5 does not need to be completed. See Identifiers listed in SRF 607.0. Output would be the same as disclosed in SRF 606.0 Table 4.	No Recommendations

### SRF 251.0 INSURANCE

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
30	SRF 251.4 RSE Profile insurance arrangements	<p>We would like APRA to clarify if the SRF 251.4, as mentioned in field 3 – Insurance Table Identifier must correspond to an insurance table identifier reported in SRF 251.3, then this form is only for reporting each group insurance policy that is offered on a default basis?</p> <p>Further to this, member count will only include members who have default level of cover. Does this include members who were offered default cover as per SRF 251.1 and/or elected to have default cover.</p>	APRA should clarify if this form only reports default cover and therefore member count is members who have default level of cover at the end of the period whether originally offered or elected.

**SRF 550.0 ASSET ALLOCATION**

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
31	SRF 550.3 Asset Allocation Derivatives and Counterparties	During the workshop, questions were raised regarding the worked example Position Type at Transaction. Our understanding of this field is to get an idea if the market value of the derivative before receipt or payment, and if it was in a different position from opening, then this may trigger an investigation. This would involve obtaining the market value at that date of receipt or payment. What if there are multiple transactions in the period, we would request clarification in the standard on whether the reporting should be based on the position at the date of the last receipt or payment prior to period end? Across a large book of derivatives, this would be very challenging to isolate daily market value pricing of individual derivatives and assign these to transactions involving the same derivatives. It is also unclear how new derivatives in the period, position type at transaction should be treated given their market value at inception will be zero.	APRA to clarify how the position type at transaction relating to the inception of a derivative should be treated where the market value is 0.  APRA also to clarify how funds should report the 'position type at transaction' for derivatives that fluctuate between a positive and negative value over the period.
32	SRF 550.3 Asset Allocation Derivatives and Counterparties	There appears to be significant overlap between this form and the existing SRF 550.2 Derivatives return (for example the first 10 columns are repeated). We would request that APRA clarify whether both these returns will be required to reported, or whether the intention of the SRF 550.3 is to replace the SRF 550.2.	APRA to clarify whether the SRF 550.3 is intended to replace the existing SRF 550.2 form or if both forms will be required to be submitted.
33	SRF 550.4 Asset Allocation Margining and Risk Mitigation for Non- Centrally Cleared Derivatives	Our custodian has raised concerns with assigning collateral to counterparties at a security level. In practice, collateral is typically maintained at an account level for each counterparty and can be spread across multiple securities. APRA needs to clarify whether the collateral posted or received per account should be apportioned between the securities it relates or grouped up at the total counterparty level. If the apportionment logic is required, that would require significant manual logic to be implemented by both custodians and funds would create an output only used for APRA reporting.	APRA to clarify whether collateral needs to be apportioned between the securities for each counterparty/account.  APRA could explore collecting collateral information at the counterparty level rather than at the security level to prevent funds and custodians having to implement complex apportionment methodology only to fit the requirements of this reporting. Collecting this data at counterparty level would also align more closely with how collateral is managed by funds.

**SRF 332 EXPENSES**

<i>Summary Reference</i>	<i>Form and Table</i>	<i>Feedback</i>	<i>Recommendation</i>
34	SRF 332.1 Indirect Investment Costs	<p>We note that the required reporting of Indirectly Held Investment Costs is a more granular reporting requirement than is required as part of RG97. As such we do not have an existing dataset that reports on Indirect Investment costs at the service provider level and would have to create one to satisfy the requirements of this proposed reporting standard.</p> <p>We also note that the 'Investment Average Market Value Amount' definition is vague and does not refer to the frequency with which the average should occur (whether it be average value at the end of the month during the period or average value in daily unit pricing outputs throughout the period).</p>	APRA to provide more detail for the 'Investment Average Market Value Amount' definition and over what period this average should be taken.