



Mr Theo Marinis  
Managing Director  
Marinis Financial Group  
49 Beulah Road  
NORWOOD SA 5067

Dear Mr Marinis

Thank you for your correspondence of 3 October 2023 to the Assistant Treasurer and Minister for Financial Services, concerning defining the terms used by superannuation funds to describe pre-mixed investment options.

Thank you for bringing your proposal to define parameters for certain investment option labels to the Government's attention. The Government is committed to assisting all members of the community to achieve a dignified retirement, which includes supporting superannuation members to understand how their retirement savings are being invested and protecting them from poor outcomes. Your proposal has been noted for further consideration.

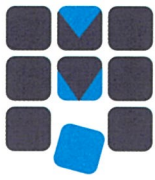
You make an important point about consumers being able to understand the different risks associated with different investment options. As you may know, the government imposes a number of disclosure requirements on superannuation funds so that these details are available for consumers. Superannuation must provide consumers with product disclosure statements about their products and, for MySuper products, trustees must also publish a 'dashboard' on the fund website. This dashboard must include information on the product including the level of investment risk, return target, and a statement of fees and other costs.

To help people understand risk, the government's MoneySmart website also provides information on the make-up and expected risks and returns of different investment options in superannuation, including growth, balanced, conservative and cash options.

Once again, thank you for your suggestion and for taking the time to write.

Yours sincerely

Brian Healey  
A/g Assistant Secretary  
Retirement, Advice and Investment Division  
21/11/2023



**MARINIS**  
FINANCIAL GROUP

3 October 2023

T 08 8130 5130

F 08 8331 9161

E admin@marinigroup.com.au

W marinigroup.com.au

A 49 Beulah Road  
NORWOOD SA 5067

The Hon. Stephen Jones  
Assistant Treasurer & Minister for Fin. Services  
PO Box 6022  
Parliament House  
CANBERRA ACT 2600

Dear *Minister Jones,*

**Why we need to define the parameters for 'balanced' superannuation funds**

I write to draw your attention to the growing problem with marketing labels used to describe pre-mixed investment options for members of superannuation funds, particularly where the default option is an investment in a 'balanced' fund.

The issues, as outlined in the attached article which recently ran in Allan Kohler's Eureka Report, include the following:

- Whilst the perception is that 'balanced' means 'balancing the investment risk' by including an allocation of 30-35% to defensive assets, it is not unusual for the asset mix in a 'balanced' fund to have a 90% allocation to growth assets.
- Too many investors do not have the expertise to look beyond the label to discern the risks.
- The inclusion of unlisted property assets further skews the risk to the unquestioning fund member.

Superannuation funds, whether industry or retail, invest within the same broad asset classes, but there are no meaningful rules governing the way in which funds justify how their asset allocation fits their marketing labels.

My call to the government, therefore, is to define, with penalties for breaches, the asset allocation parameters for pre-mixed investment options labelled 'Defensive', 'Moderate', 'Balanced', 'Growth' and 'High Growth'.

Consumers need to be able to safely align their risk appetite with the investment options they are offered.

If you or any of your team wish to discuss this matter further, I can be contacted on (08) 8130 5130.

Sincerely,

**Theo Marinis CFP®, B.A., B.Ec., CPA., MCIFAA**  
**Managing Director**

Enc

# How a Balanced Fund Could Leave You Teetering

Theo Marinis delves into what really constitutes a balanced fund and finds that it's worth demanding more clarity.



By **Theo Marinis**

5 Sep 2023

To the ordinary investor, the term ‘balanced’ might suggest a secure and thoughtful place to invest – but you need to look beyond the labels.

The superannuation industry has been made deliberately opaque by marketers scrabbling to attract funds under management – with the consequence that investors are often put into unsuitable asset exposures for their risk profile by advisers failing to unpack the components of a fund.

Superannuation funds, whether industry or retail, invest within the same broad asset classes, but evaluating performance and the associated risks is not as simple as ranking percentage returns for a given period. There are no meaningful rules governing the way in which funds justify how their asset allocation fits their marketing labels, nor are there guidelines around the disclosure of their risk diversification strategies (or lack thereof) – or the underlying valuation methods used in the declaration of returns.

This lack of comparability fosters misrepresentation.

## Proper Labelling

As a consequence, many industry super funds labelled ‘balanced’ – traditionally defined as funds which have a 70/30 ratio to growth versus defensive assets – often have an 80 per cent to 90 per cent exposure to growth assets after allocations of as much as 30 per cent to 40 per cent to direct and unlisted property (but presented as defensive assets or ‘alternative’ assets) are taken into account. But property is not a ‘low risk’ asset class; it is a growth asset and should not be mis-categorised.

Funds with a higher exposure to growth assets will obviously perform better in good times than one which has, for example, a 65 per cent exposure. But when the market corrects, as it always does, the fund with the highest exposure will be subject to the highest falls – leaving investors in that fund to wonder why their ‘balanced’ portfolio has been so adversely affected.

In other words, one alleged ‘balanced’ fund with very high risk/growth can shoot the lights out when compared with a more conservative (and true to label) option. Putting both in the same category is highly misleading and begs to be addressed.

## **Spreading Risk**

Similarly, investing across the top 300 stocks of the ASX (for example, using an Australian share index fund) spreads investor risk via stock diversification. But, when an active fund manager selects just 20 or 30 stocks which they believe will be outperformers, then there is a need to explain the risk to those who trust them. For example, if the fund manager had bought into the pre-GFC hype around ABC Learning Centre or Babcock and Brown – despite being two of the top 300 companies on the ASX – the cash would be gone.

Experience also tells me that many industry super funds (whose 10-year returns in their ‘balanced’ options have dominated the performance charts on the basis of the inflated valuations applied to their direct and unlisted assets) are very likely to have a performance reversal in the next financial year.

Required by law to be marked to market, these asset valuations will reflect the COVID-induced economic changes (e.g., working from home, increased online shopping) and the looming slowdown driven by Reserve Bank interest rate hikes – pre and post the current interest rate increase cycle. As a result, the returns of exposed ‘balanced’ fund members (who are often unwittingly in growth asset allocations) will be adversely affected. We are already beginning to see these results being played out in returns on unlisted property trust holdings.

## **Mandated Definitions**

Rather than getting carried away with pointless measurements to create an APRA ‘My Super’ comparison table, and the frustrating practice of hiding behind percentage returns and selective timelines, the government should mandate the definitions and asset

allocations for the labels ‘Defensive’, ‘Moderate’, ‘Balanced’, ‘Growth’ and ‘High Growth’ super fund investment options. This would be a far more sensible and useful way to assist with comparing any pair.

The fundamental rule of investing, gambling, and hunting remains the same: There is no high reward without a higher level of risk. The difference is that investing has another fundamental rule – the rule of diversification – the ability to spread risk by selecting good quality assets from a broad range of classes.

A successful diversification strategy is only achievable if there is clarity around asset allocations and valuation methods. Make sure you understand what you are buying.

---

**Theo Marinis is Managing Director of Marinis Financial Group.**

*Disclaimer: Performance data quoted represents past performance and does not guarantee future results. The information in this article is general information only. It is not intended as financial advice and should not be relied upon as such. The information is not, nor is intended to be comprehensive or a substitute for professional advice on specific circumstances. Before making any decision in respect to a financial product, you should seek advice from an appropriately qualified professional on whether the information is appropriate for your particular needs, financial situation and investment objectives. The information provided is correct at the time of its creation and may not be up to date; please contact Marinis Financial Group for the most up to date information.*

Proudly

**INVESTSMART**

Financial Strategies (SA) Pty Ltd trading as Marinis Financial Group

T 08 8130 5130 | F 08 8331 9161 | A 49 Beulah Road, NORWOOD SA 5067

E [admin@marinigroup.com.au](mailto:admin@marinigroup.com.au) | W [marinigroup.com.au](http://marinigroup.com.au)

ABN 54 083 005 930 5067 | AFSL No: 326403

Reproduced with the permission of InvestSMART

Disclaimer:

Performance data quoted represents past performance and does not guarantee future results.

The information in this article is general information only. It is not intended as financial advice and should not be relied upon as such. The information is not, nor is intended to be comprehensive or a substitute for professional advice on specific circumstances. Before making any decision in respect to a financial product, you should seek advice from an appropriately qualified professional on whether the information is appropriate for your particular needs, financial situation and investment objectives.

The information provided is correct at the time of its creation and may not be up to date; please contact Marinis Financial Group for the most up to date information.