Allan Gray Australia Balanced Fund

ETL4654AU Author: Ian Cannon Published: 28 Apr 2025 Data is provided by the manager at 30 Jun 2024, and currency in AUD, unless otherwise stated



Refer to glossary for definition of the rating

Product Review

About this Product

Investment manager	Allan Gray Australia Pty Ltd
Benchmark	Lonsec Strategic Multi-Asset (Traditional) 60% Growth Index
Product structure	Managed Fund
Product size	\$180.00m
Inception date	Mar 2017
Asset class	Multi-Asset
Sector	61-80% Growth Assets
Growth/defensive split	60%/40% (not targeted)
Peer group	Diversified
Rated peers	19

Product Characteristics

Business Life Cycle	Growing
Product Wind-Up Risk	Low
Key Person Risk	Medium
Tenure of Decision Makers	High
Complex (RG240)	No
Strategy Remaining Capacity	No capacity limit
ESG Approach	Risk or Value
Peer Relative Fees and Costs	Below median

Annual Fees and Costs (% p.a.)

Management fees & costs	0.76
Performance fee costs	0.00
Net Transaction Costs	0.01
Buy/Sell Spread	0.20/0.20
Annual fees and costs	0.77

Product Opinion

The Fund's rating has been upgraded to '**Recommended**' at its latest review. The rating reflects the regard for Portfolio Managers Simon Mawhinney and Alec Cutler and strength of the contrarian bottom-up research process and portfolio hedges. The Fund has met its return objectives and is one of the top performers from both absolute and risk-adjusted perspectives.

The total fee load is below the peer median but may be higher should performance fees apply. The team's experience and breadth in fixed income within a multiasset context is relatively limited compared to larger multi-asset managers,

Lonsec Rating Model

Rating key: 🔵 🔵 Ab	oove	In-line Below
Factor	Peer Rating	YoY Score Change
Business		\checkmark
Team	$\bullet \bullet \bullet$	1
Process		_
ESG		\checkmark
Product		_
Fees		1
Performance		1

Allocation Profile

Core		
Satellite		
	Low Complexity	High Complexity

Return Profile

Income		
Capital		
	Defensive	Growth

Source: FE fundinfo, PDS Date: 08/Oct/2024

Strengths

- The Fund's lead Portfolio Managers, Simon Mawhinney and Alec Cutler, are considered experienced investors.
- The Manager's bottom-up contrarian equity research is detailed and of high quality.
- The Fund has met its return objective and is one of the top performers in the peer group from both absolute and risk-adjusted perspectives.
- The Fund's portfolio hedges of equity beta and currency are a competitive edge.

Weaknesses

- The team's experience and breadth in fixed income within a multi-asset context is relatively limited compared to some larger multi-asset peers.
- The breadth of asset classes available to the Manager is not as broad as some peers.
- The Fund may, at times, demonstrate a less attractive drawdown profile than peers.
- While the estimated fee is below the peer median, a performance fee may apply and increase the total fee load.

Key Facts

Key Objectives

Investment objective	To seek long-term returns that are higher than the custom benchmark. In doing so, the Fund aims to balance capital growth, income generation and risk of loss using a diversified portfolio.
Internal return objective	To outperform the Fund's benchmark over the long term after fees.
Internal risk objective	N/A

Asset Allocation (%) (as at 30/06/2024)

Benchmark %%%Allocation %Australian EquitiesN/A0.0090.0024.00International EquitiesN/A0.0090.0040.00Australian Fixed InterestN/A0.0050.0010.00Global Fixed InterestN/A0.0050.0018.00CashN/A0.0010.003.00					
EquitiesN/A0.0090.0040.00International EquitiesN/A0.0090.0040.00Australian Fixed InterestN/A0.0050.0010.00Global Fixed InterestN/A0.0050.0018.00CashN/A0.0010.003.00OthersN/A0.0010.005.00					Current Allocation %
EquitiesAustralian Fixed InterestN/A0.0050.0010.00Global Fixed InterestN/A0.0050.0018.00CashN/A0.0010.003.00OthersN/A0.0010.005.00		N/A	0.00	90.00	24.00
Interest N/A 0.00 50.00 18.00 Global Fixed Interest N/A 0.00 10.00 3.00 Cash N/A 0.00 10.00 3.00 Others N/A 0.00 10.00 5.00		N/A	0.00	90.00	40.00
Interest N/A 0.00 10.00 3.00 Others N/A 0.00 10.00 5.00		N/A	0.00	50.00	10.00
Others N/A 0.00 10.00 5.00		N/A	0.00	50.00	18.00
	Cash	N/A	0.00	10.00	3.00
Total 100.00	Others	N/A	0.00	10.00	5.00
	Total				100.00

Product Distribution Profile

Frequency	Annually
Last Missed Distribution	N/A
Number of Missed Distributions in the last 5 years	0
AMIT Election	Yes
TOFA Election	No

Rating History

15-May-2024	Investment Grade
08-May-2023	Investment Grade
25-Mar-2022	Investment Grade

Target Market Determination

Produced by issuer	Yes
Provided to Lonsec	Yes

Performance Analysis - annualised after fees at 31/12/2024

	1 Year	Median	2 Year	Median	3 Year	Median	5 Year	Median
Performance (% p.a)	14.65	11.36	10.62	10.99	9.50	4.85	7.80	6.22
Standard deviation	7.66	5.76	7.31	6.93	9.03	8.52	10.97	9.96
Excess return (% p.a)	1.78	-3.19	-1.31	-2.23	4.62	-0.83	1.64	-0.84
Outperformance ratio (% p.a)	33.33	33.33	37.50	35.42	50.00	44.44	50.00	45.00
Worst drawdown (%)	-1.93	-2.44	-5.39	-5.46	-9.14	-8.87	-16.91	-15.13
Time to recovery (mths)	NR	3	3	-	3	-	11	-
Sharpe ratio	1.33	1.28	0.88	0.98	0.70	0.21	0.53	0.43
Information ratio	0.36	-1.88	-0.31	-1.34	0.78	-0.36	0.26	-0.32
Tracking error (% p.a)	4.96	1.33	4.20	1.41	5.95	1.97	6.20	2.27

Lonsec Peer Group: Multi-Asset - 61-80% Growth Assets - Diversified

Product Benchmark: Lonsec Strategic Multi-Asset (Traditional) 60% Growth Index

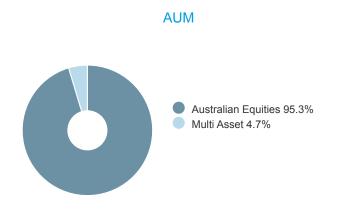
Cash Benchmark: Bloomberg AusBond Bank Bill Index AUD

Time to recovery: NR - Not recovered, dash - No drawdown during period

Business •••

Facts

Investment Manager	Allan Gray Australia Pty Ltd
Ultimate Parent Company	Allan & Gill Gray Foundation
Headquarters	Sydney
Inception Date	Dec 2004
% Staff Ownership	10-20%



Governance

% Independent board members	50
% Female board members	0
Independent chair	No
CEO as Chair	Yes
Separate Audit Committee	No

Metrics	
Total AUM	
Investment Management Headcount	
Investment Professionals	
Sales & Service	

Who is the Manager?

Allan Gray Australia Pty Limited is the Manager of the Fund. The Manager was established in 2005 and had \$12.2b in assets under management as of September 2024. Allan Gray Australia forms part of the Orbis Allan Gray Group which was established in 1989 by Dr Allan Gray. Allan Gray Australia shares common ownership along with its investment philosophy and approach with sister companies Orbis Investments, a global asset management firm founded in 1989, and Allan Gray Proprietary Limited ('AGL'), a South Africa-domiciled domestic asset management firm founded in 1973 and is South Africa's largest private asset manager.

Distributor

Lonsec Opinion

Profitability

The Investment Manager is a well-entrenched investment management firm with FUM of \$12.2b primarily in Australian equities. At the current FUM level, the Manager is in a reasonably solid financial position.

Business Track record

Allan Gray has maintained its investment approach and philosophy since the firm was founded in 2004, Allan Gray has a notable track record in managing assets across Australian equities and to a lesser extent multi asset strategies which was launched in 2017.

Business Ownership

Allan Gray enjoys a strong boutique ownership culture, with foundation owners a charity with a long-term investment horizon. The Allan and Gill Gray Foundation ('the Foundation') indirectly holds a controlling ownership stake in Allan Gray. The Foundation was established to: (i) to promote the commercial success, continuity and autonomy of the Orbis and Allan Gray groups, and (ii) to ensure distributable profits of the Foundation are devoted to philanthropy.

Oversight of the businesses has been vested in Orbis Allan Gray Limited, a holding company whose board consists of a majority of present executives and includes non-executive directors.

Business Governance

Allan Gray is considered to have a reasonable governance framework. In 2023, during a series of corporate actions, Allan Gray contravened the allowable ownership level under the Corporations Act substantial holding disclosure and takeover laws. No orders were made against Allan Gray, although Allan Gray voluntarily undertook corrective measures, reported their contraventions of the Corporation Act to ASIC and reviewed their compliance systems and processes to ensure of no reoccurrence.

While two directors of the Board of four are non-executive directors, they hold directorships across other group entities.

\$11.3b 27

Internal

9 10



Team

Key Decision Makers (KDM)

	Primary function	Dedicated to strategy	Appointed to strategy	Industry/Mgr exp. (yrs)	Exp. in PM roles (yrs)
Simon Mawhinney	CIO	Yes	2017	23/18	13
Alec Cutler	Portfolio management	Yes	2017	30/20	11

KDM Change*

No changes.

* Last 3 years

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Size	17
Structure	Decentralised
Turnover	Low
Alignment	
KDM equity held in manager	Yes
KDM co-investment in strategy	Yes
Performance-Based bonus	Yes
Long term incentive plan	Yes

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	Number	Average Years Experience
Key decision makers	2	26
Portfolio Managers		
Hybrid portfolio manager/ analysts		
Dedicated analysts	14	12
Dedicated dealers		
Quantitative		
ESG/Sustainability	1	3
Macro		
Investment Specialists		

Who is the Team?

Simon Mawhinney leads the Allan Gray investment team of nine and is named Portfolio Manager for the Fund. Alec Cutler manages the global sleeve of the portfolio and leads the Orbis Multi-Asset team of eight based in Bermuda. Mawhinney has over 23 years of investment experience while Cutler has over 30 years of investment experience.

Including the global multi-asset team, the investment team includes 17 members, with the most senior members holding an average level of industry experience of around 20 years. Mawhinney is supported in the Australian sleeve of the portfolio by co-portfolio manager Suhas Nayak.

Team (continued)

Lonsec Opinion

Skill

Mawhinney and Cutler are the key investors and are responsible for the performance of the Fund. Mawhinney, with over 23 years of experience. has built a solid track record aligned with the Allan Gray Philosophy and process. Cutler is an experienced investor with more than 30 years of industry experience, including 21 years with Orbis.

While the team may have less direct experience in multi-asset strategies compared to highly rated multi-asset peers, the team has demonstrated strong capacity to deliver investment objectives over the life of the Fund. The team leverages off the broader investment team, across both Orbis and Allan Gray particularly equities which are viewed as possessing a strong pedigree in this asset class.

Team Size

Considering the breadth of asset classes available to the Manager, the size of the investment team is commensurate with the requirements of the investment process. The team draws on and contributes to the efforts of other Allan Gray and Orbis research teams, including a global team of sector specialists, three regional teams, stockpickers who look across the whole equity universe, the currency team, and the Quant and Data Insights team.

Track Record/Co-Tenure

Mawhinney and Cutler both have significant tenure at their respective firms of around two decades for each and over eight years of co-tenure. Tenure among the broader team at the senior level is relatively high, with an average of eight years cotenure. The team has been relatively stable in recent years.

Alignment

The alignment of interest with investors is a strength of the firm, albeit more tied to the Manager's equity funds than its multiasset funds. The level of co-investment by the team in the Manager's own strategies is high and the Manager's remuneration structure is heavily incentive based. Variable remuneration for Analysts is predominantly 80%, driven by their investment calls and the Fund's performance. 70-80% of variable remuneration for the Portfolio Managers is driven by Fund performance.

Key Person Risk

Key person risk in Mawhinney and Cutler is moderate given their involvement in managing the Fund and are supported by well resourced team with good level of co-tenure.

Process •••

What is the Investment Process?

The asset allocation in the Fund is driven primarily from the bottom up, through views emerging from the underlying research process. While the Fund does not use an SAA in its asset allocation process, the default, or neutral, position is 60/40 equity/fixed income, and 60/40 Australian/International, as reflected by the Fund's composite Benchmark.

Drawing on the ideas of global company analyst teams, Mawhinney and Cutler direct client capital into the highest conviction ideas across equities, Government bonds, treasury inflation-protected securities, corporate bonds, and commodity-linked assets, selected on a bottom-up basis. Mawhinney manages the Australian exposures of the Fund, while the global exposures are managed by Cutler. Inputs from the Quant and Currency analysts and internally developed tools, are considered to manage equity and currency hedging and portfolio-level risks.

Lonsec Opinion & Supporting Facts

Philosophy and Universe

Investment Style	Diversified
Asset Allocation Approach	Unconstrained or Real Return
Sector Exposure	Active
Available Universe	Direct Securities, Derivatives, Cash

The Manager follows a deep value and contrarian investment philosophy which has been consistently applied. The Manager has the core belief markets are not always efficient nor rational due to the impact of short-term reactions from investors. The Manager believes this can lead to the market focusing on short-term news versus the long-term fundamental outlook. The Manager seeks to exploit such occurrences and gains exposure to companies either via equity or debt, and in some cases both, if the investment opportunity is highly compelling.

Research Process

Idea generation	Analyst research, Academic research/data
SAA review frequency	N/A
DAA/TAA signals	Valuation
Managers actively tracked	N/A
External consultant	N/A

Bottom-up idea generation, of contrarian high conviction opportunities, is at the core of the Manager's philosophy and research process. Research ideas are formulated by using a variety of qualitative and quantitative tools with a tendency to identify 'unloved' securities through periods of price depression in otherwise sound businesses. This process is viewed favourably overall, and results in individual analysts having the discretion to provide their own fundamental research on a paper portfolio of 'best investment ideas', a differentiating feature of the Fund compared to peers.

Once an investment idea has been developed by an analyst, they are then required to make a presentation to the Policy Group Meeting ('PGM'). The discourse in the PGM is aided by the team's diverse academic and employment backgrounds. The valuation techniques and assumptions adopted are critically assessed at the PGM. This is a significant part of the process adding rigour to, and encouraging development of, the analysts and the research process.

While the breadth of the fixed income universe the Manager selects from may be narrower than larger multi-asset peers, the research capability of the global sector specialists is commensurate to the investment approach. The research developed from the Quant and Currency analysts supporting Cutler's portfolio decisions on the equity and currency hedging component the Fund is considered a competitive edge of the investment process.

Process (continued) •••

Portfolio Construction

Portfolio decision making	Portfolio Manager
Approach to benchmark	Benchmark Unaware
Targeted tracking error	N/A
Typical number of managers	N/A
Use of mandates	No
Use of alternatives	Yes
Use of unlisted assets	No

There is a strong link between portfolio construction and research effort, with the team seeking high conviction asymmetric risk-return trade-off opportunities with margins of safety, with consideration liquidity and diversification. While the portfolio construction process may be relatively opaque compared to peers, it is appropriate given the investment philosophy.

Mawhinney and Cutler share regular discourse and review reporting on the Fund's exposures to ensure no unintended exposure overlaps. Although management of the portfolio in aggregate is undertaken favourably, the Fund's allocation to two distinct sleeves makes managing to a total portfolio approach slightly more challenging. The approach to reduce portfolio equity beta aligns with their conviction in extracting equity alpha from their value and contrarian style and it also reflects the firm's specialist skill set in equities with less reliance on bottom-up expertise in fixed income.

Capacity Management

Capacity is not to a concern for this Fund at this stage given the investable universe and size of the strategy.

Investment Risk Management

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Monitoring external to investment team	Yes
Frequency of monitoring	Quarterly
Primary risk management system	Proprietary
Security Limits (Min./Max.)	N/A
Rebalancing bands	N/A
Gross exposure range	N/A

The Manager's approach to risk management is a material component of its investment process with the Manager demonstrating a strong risk awareness in its portfolio construction.

The Manager has a focus on 'bottom-up' risk in its security research via a 'Margin of Safety' incorporated into its research. This 'Margin of Safety' approach is aligned to the Fund's risk objective to contain the risk of monetary loss to a level below the risk of loss experienced by global equity funds but higher than government bond funds and cash deposits over the long term.

The Manager's use and skill in implementing equity and currency hedging is a strong component of their portfolio risk management.

The Manager has less of an emphasis on traditional 'top-down' risk management, such as tracking error or hard sector limits, relative to other multi-asset peers, although quantitative risk models are used to monitor and measure risk exposures.

ESG •••

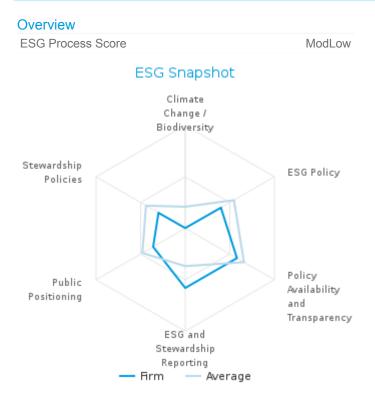
Manager Positioning - Product

Responsible investment style	ESG Integration
ESG approach	Risk or Value
Sustainability thematic	No Sustainability Thematic
Non-financial objective	None

What is the Manager's ESG approach for this product?

The Manager has indicated that their Responsible Investment style is 'ESG Integration' and as such that they take Environmental, Social and Governance factors into consideration when assessing investment opportunities. With a primary ESG style of 'Risk or Value' Managers will determine inclusion based on the balance of overall risk (including ESG risk) and potential return. As a result, this approach may mean that lower quality ESG companies may be included if the return potential is sufficient, and this may conflict with some clients' perception of what a strong ESG process would deliver.

Lonsec Opinion & Supporting Facts



Product Level Approach

The Manager does not source general external ESG data instead relying on collecting its own ESG data through company meetings and web sites. This is less robust than peers. While there may be elements of ESG integration undertaken in underlying asset classes there is no clear ESG structure at the overall portfolio level, with no ESG committee, minimum ESG requirements for underlying assets or required styles of ESG integration. The Manager does not apply any portfolio level screens and does not perform look through monitoring of portfolio rules. While ESG risks are reflected in position sizing there is no clear portfolio level ESG monitoring or management with all monitoring activity focused on individual stocks. The Manager demonstrated a strong engagement program and a structured approach. Engagements are documented with clear objectives set and outcomes tracked.

Strategy: Clarity, Measurability & Reporting

This product does not make any specific claim to being a sustainable, ethical or impact offering. As such, an alignment review for the product is not required thus the product's risk of misalignment has been assessed as N/A.

Manager Level Approach

The Manager's overall ESG policy framework and disclosure lag behind their peers. The manager's stewardship policy is weakly positioned with a strong focus on investment returns. The stewardship policy score reflects a policy framework that lacks depth compared to peers. Although engagement is a key part of the Manager's investment process, the framework is very high level and lags behind industry-leading peers. Engagement outcomes are in their Stewardship Report, with some engagement activities provided but are less structured than peers.

Allan Gray Australia Balanced Fund

Product •••

Service Providers

Responsible entity	Equity Trustees Limited
Investment manager	Allan Gray Australia Pty Ltd
Sub-investment manager	Orbis Investment Management Limited
Custodian	Citibank
Administrator	Citigroup Pty Ltd
Fund Auditor	Ernst & Young
Change in Key Providers? (Over last 12 months)	No

Product Details

Product size	\$180.00m
Fund 12-month net flows	Positive
Distribution model	Internal
Buy/sell spreads	0.20%/0.20%
Net transaction costs	0.01
Product type	Registered Managed Investment Scheme (Unitised)

What is the Product Structure?

The Fund is an Australian unit trust, with Equity Trustees Limited appointed as the responsible entity.

Lonsec Opinion

Service Providers

The Fund uses an external 'Tier 1' Responsible Entity ('RE') provider. The use of external REs is a preferred operating model. Additionally, the Manager uses high quality 'tier 1' service providers, including its counterparties.

Operational 'Red Flags'

The Fund is a multi-asset strategy investing across a range of relatively liquid securities within growth and defensive assets classes and is not considered operationally challenging to implement.

Wind-up Risks

Wind-up risk of the Fund is considered to be low. The Fund's size is healthy and has enjoyed net inflows of over the last twelve months and is available across many platforms.

Fees

Annual Fees and Costs (% p.a.)

Management fees & costs	0.76
Performance fee costs	0.00
Net Transaction Costs	0.01
Buy/Sell Spread	0.20/0.20
Annual fees and costs	0.77
Source: FE fundinfo, PDS Date: 08/Oct/2024	

Performance Fees

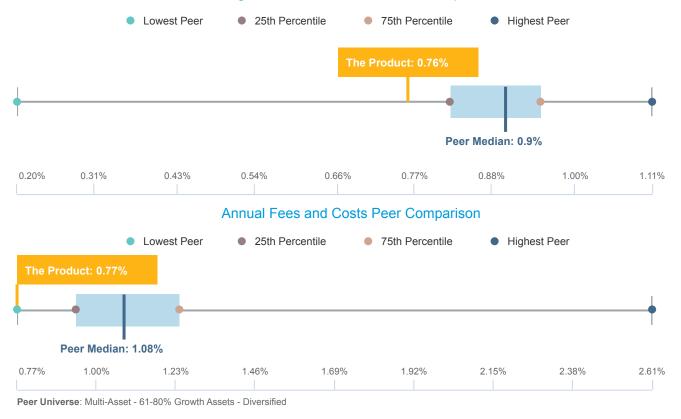
Applicable	Yes
Hurdle type	Benchmark relative
Hurdle	Outperform the benchmark net of fees
Rate	20%
Fee capping	No
High watermark	Yes
Above high watermark	No
Reset Allowed	No

Fees Explained

The Fund's PDS dated 8 October 2024 disclosed Annual Fees and Costs ('AFC') totaling 0.77% p.a. This value comprises (1) Management Fees and Costs of 0.76% p.a., (2) Performance Fees of 0.00% p.a., and (3) Net Transaction Costs of 0.01% p.a. The Fund charges buy/sell spreads set at 0.20%/0.20%.

The performance fees accrue at a rate of 20.3% p.a. charged on excess returns, net of the base management fee, above the Fund's Benchmark, subject to a high-water mark. The estimate above is based on the average of the actual performance fees paid for the Fund over the previous five financial years.

Management Fees and Costs Peer Comparison



Lonsec Opinion

Annual Fees and Costs

The disclosed total fee load (AFC) for the Fund is below the peer median.

Fairness

Given the level of active risk taken by the Manager and the performance fee applicable, the fee structure is relatively well structured and provides alignment.



Performance data is as at 31 December 2024

Performance

balance capital growth, income generation and risk of loss using a diversified portfolio. Internal return objective To outperform the Fund's benchmark over the long term after fees. Internal risk objective N/A Product benchmark Lonsec Strategic Multi-Asset (Traditional) 60% Growth Index	Performance Summary	
Internal risk objective N/A Product benchmark Lonsec Strategic Multi-Asset (Traditional) 60% Growth Index	PDS return objective	To seek long-term returns that are higher than the custom benchmark. In doing so, the Fund aims to balance capital growth, income generation and risk of loss using a diversified portfolio.
Product benchmark Lonsec Strategic Multi-Asset (Traditional) 60% Growth Index	Internal return objective	To outperform the Fund's benchmark over the long term after fees.
	Internal risk objective	N/A
Diversified	Product benchmark	Lonsec Strategic Multi-Asset (Traditional) 60% Growth Index
Lonsec peer group Diversitied	Lonsec peer group	Diversified

Alpha Generation

The Fund's reference Benchmark is a composite reflecting the neutral asset allocation of the Fund. The charts below measure the Fund's performance against the Lonsec product benchmark, not the Fund's reference Benchmark. The Fund has met its investment objective and is one of the top performers in the peer group over the medium term from both absolute and excess return perspectives.







Alpha Consistency

The Fund has demonstrated good level of consistency of performance over the medium-term, but due to relatively high tracking error and volatility can demonstrate some year-to-year inconsistency.



We strongly recommend that potential investors read the product disclosure statement Lonsec Research Pty Ltd ABN 11 151 658 561 • AFSL No. 421 445 • This information must be read in conjunction with the warning, disclaimer and disclosure and Lonsec Research FSG at the end of this document. This report supersedes all prior reports.

7 Year



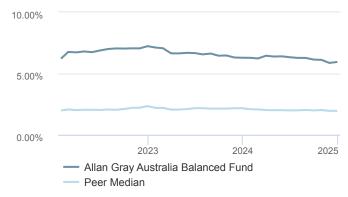
Performance data is as at 31 December 2024

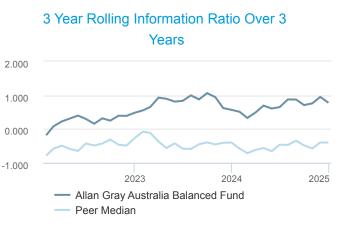
Performance (continued)

Benchmark Relativity

Compared to the Lonsec peer group and referencing the Lonsec Strategic Multi-Asset (Traditional) 60% Growth Index as a proxy benchmark, the Fund's tracking error is well-above the peer median given the relatively high conviction approach from a security selection perspective. The Fund's Information Ratio is one of the highest in the peer group.

3 Year Rolling Tracking Error Over 3 Years





Return Volatility

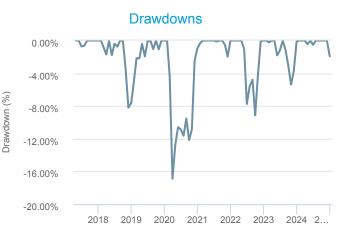
The Fund's volatility over three- and five-year periods has been above peer median. The stronger relative performance has resulted in stronger risk-adjusted performance than peers, as demonstrated by higher Sharpe ratios over the medium-term.



Product Defensiveness

The Fund's drawdown profile is similar to the peer median over the short and medium term but has been less favourable than the peer median over the long-term.





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Ratings

'Highly Recommended' rating indicates that Lonsec has very strong conviction the product can meet its investment objectives.

'Recommended' rating indicates that Lonsec has strong conviction the product can meet its investment objectives. **'Investment Grade'** rating indicates that Lonsec has conviction the product can meet its investment objectives.

'Approved' rating indicates that Lonsec believes the product can meet its investment objectives.

'Not -Approved' rating indicates that Lonsec does not believe the product can meet its investment objectives.

'Closed / Wind Up' status is applied when the product has been closed.

'Fund Watch' status is applied when a rating is under review due to the occurrence of a significant event relating to the product.

The '**Redeem**' rating indicates Lonsec no longer has sufficient conviction that the product can meet its investment objectives. The '**Screened Out**' rating indicates Lonsec was unable to attain sufficient conviction that the product can meet its investment objectives.

'Discontinued Review' status is applied where a product issuer withdraws the product from the review process prior to completion, for any reason other than the product being closed or unavailable to investors.

The '**Ceased Coverage'** status is applied when a rated product is withdrawn from the research process by the product issuer.

General

Climate Change / Biodiversity: the extent to which a manager has a leading climate and biodiversity policies. ESG and Stewardship Reporting: the transparency, accessibility and usefulness of a manager's reporting. ESG Policy: the strength of commitment to ESG as ascertained by a review of a manager's ESG policies. Excess return: Return in excess of the benchmark return. Information ratio: Relative reward for relative risk taken (Excess Returns / Tracking Error).

Key decision maker (KDM): A nominated investment professional who has portfolio decision making discretion for a Fund, e.g. 'buy' or 'sell' decisions.

Market capture ratio: A product's performance during either 'up' or 'down' market trends relative to an index.

Policy Availability / Transparency: the ease of public access to, and transparency of, a manager's overall ESG policy suite. **Public Positioning:** the resolve of a manager's commitment to ESG as ascertained by their public positioning.

Returns consistency: The proportion of a product's monthly outperformance during a period relative to the benchmark when it was rising, falling and in aggregate.

Sharpe ratio: Excess return earned for additional volatility experienced when holding riskier assets versus risk-free asset. Standard deviation: Volatility of monthly Absolute Returns. Stewardship Policies: the strength of a manager's proxy voting and engagement policies with respect to ESG. Time to recovery: The number of months taken to recover the Worst Drawdown.

Total return: 'Top line' actual return, after fees.

Tracking error: Volatility of monthly Excess Returns against the benchmark (the Standard Deviation of monthly Excess Returns).

Worst drawdown: The worst cumulative loss ('peak to trough') experienced over the period assessed.

Lonsec Group Disclaimers

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https://www.lonsec.com.au/lonsec-group-conflicts-of-interest-statement/

Lonsec Research FSG Financial Services Guide

This Financial Services Guide (FSG) has been prepared and issued by Lonsec Research Pty Ltd ABN 11 151 658 561 (Lonsec Research, we, us, our), holder of Australian Financial Services Licence (AFSL) No. 421445, to assist you in determining whether to use our financial services and products. This is an important document, and you should read it carefully. The contents of this FSG are general information only and does not take into account your personal needs or objectives. Lonsec Research provides no warranty as to the suitability of the services of this FSG for any particular person.

1.1 What is a Financial Services Guide?

This FSG's purpose is to provide you with important information regarding services offered by Lonsec Research. You should read this FSG prior to using our services. This document was prepared to inform you about:

- who we are and our contact details;
- the financial services we provide;

- the remuneration that may be paid to us and other persons in relation to the financial services we provide;
- how we deal with conflicts of interest; and
- how we deal with complaints

1.2 About Lonsec Research and its related parties

ASX listed Generation Development Group Limited (ABN 90 087 334 370) is the parent company of Lonsec Holdings Pty Ltd (ABN 41 151 235 406) (Lonsec Holdings). Lonsec Research is a wholly owned subsidiary of Lonsec Holdings Pty Ltd (ABN 41 151 235 406) (Lonsec Holdings) and provides indepth, investigative investment research across a broad range of listed and unlisted investments. Other subsidiaries of Lonsec Holdings include SuperRatings Pty Ltd (ABN 95 100 192 283), Implemented Portfolios Pty Limited (ABN 36 141 881 147) and Lonsec Investment Solutions Pty Ltd (ABN 95 608 837 583). All employees of the Lonsec group entities, including Lonsec Research, are employed by Lonsec Fiscal Pty Ltd (ABN 94 151 658 534).

Contact Details

Lonsec Research Pty Ltd Level 39, 25 Martin Place Sydney NSW 2000 **Tel:** 1300 826 395 **Email:** <u>info@lonsec.com.au</u> www.lonsec.com.au

1.3 What kind of financial services can Lonsec Research provide?

Lonsec Research is authorised under its Australian Financial Services Licence to provide general financial product advice to retail and wholesale clients on the following types of financial products:

- securities
- deposit and payment products limited to basic product products
- derivatives
- interests in managed investment schemes including investor directed portfolio services
- superannuation
- retirement savings accounts
- foreign exchange products
- life products including:
- investment life insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds; and
- life risk insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds;

Lonsec Research is also authorised to deal in a financial product by arranging for another person to apply for, acquire, vary, or dispose the above types of products for or by retail and wholesale clients.

1.4 Provision of general advice

Any advice that Lonsec Research provides is of a general nature and does not take into account your personal financial situation, objectives or needs. You should, before acting on the information, consider its appropriateness having regard to your own financial objectives, situation and needs and if appropriate, obtain personal financial advice on the matter from a financial adviser.

Lonsec Research FSG (continued)

Before making a decision regarding any financial product, you should obtain and consider a copy of the relevant Product Disclosure Statement or offer document from the financial product issuer.

1.5 How Lonsec Research is paid

Lonsec Research receives fees from Fund Managers and/or financial product issuers for researching their financial product(s) using comprehensive and objective criteria. Lonsec receives subscriptions fees for providing research content to subscribers including financial advisers, fund managers and financial product issuers. Lonsec Research's fees are not linked to the financial rating outcome of a particular financial product. Lonsec Research fees are determined by private agreement with its clients depending on a number of criteria including the number of financial advisors who access Lonsec Research publications, the range of publications accessed and the complexity of a specific research assignment. Due to the specific nature of its charges, disclosure of Lonsec Research fees may not be ascertainable when you receive this FSG, but you are able to request this information in writing before a financial service is provided to you. The fees received by Lonsec Research do not have an effect on the inclusion (or otherwise) of a financial product in portfolios managed by Lonsec Investment Solutions; or in approved product lists as a result of Lonsec Investment Solutions consulting activities. We do not have any direct employees as all employees are contracted, for employment purposes, with Lonsec Fiscal, a subsidiary of Lonsec Holdings. All employees of Lonsec are paid a salary and may receive a discretionary bonus which is not guaranteed. Sales employees may have a sales commission plan, relevant for sales to Wholesale clients, as offered by Lonsec Research from time to time at its discretion.

1.6 How do we manage our compensation arrangements?

Lonsec Research has Professional Indemnity insurance arrangements in place to compensate clients for loss or damage because of breaches of any relevant legislative obligations by Lonsec Research or its representatives which satisfy section 912B of the Corporations Act 2001.

1.7 What should you do if you have a complaint?

Lonsec Research's internal complaints handling process is designed to ensure that your concerns are treated seriously, addressed promptly and fairly. A complaint may be lodged either verbally or in writing and will be dealt with in strict confidence. If you have a complaint relating to Lonsec Research's products, services, its employees, the complaint should be addressed to:

Complaints Manager Level 39, 25 Martin Place Sydney NSW 2000 Tel: 1300 826 395 Email: complaints@lonsec.com.au

An individual may request further information about Lonsec Research's internal complaints handling procedure at any time. If an individual is not satisfied with the outcome of their complaint or has not received a response within 30 days from Lonsec Research, the individual can complain to the Australian Financial Complaints Authority (AFCA). AFCA provides an independent dispute resolution service and can be contacted on:

Online: www.afca.org.au

Email: info@afca.org.au Phone: 1800 931 678 Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne, Victoria, 3001.

1.8 Conflicts of Interest

Lonsec Research is aware of the inherent potential conflicts of interest associated with the provision of ratings and how we are remunerated for our services. There are a comprehensive set of policies, and procedures in place at Lonsec Holdings that apply to its subsidiaries including Lonsec Research. Information barriers (both permanent and temporary) consistent with our regulatory obligations under Regulatory Guide 79 are in place to manage either perceived or actual conflicts of interest. Employees of Lonsec also have to abide by Personal Trading and Gifts and Entertainment requirements and are trained on these requirements from time to time.

Lonsec Research review and rate products for Fund and Equity Managers who may from time to time have holdings within Generation Development Group Limited. Lonsec Research manages any potential conflict by disclosing to investors who access the research for these products and by implementing a comprehensive ratings process, information barriers and monitoring program. For further information on how Lonsec manages its conflicts refer to our Conflicts of Interest Statement accessible here <u>https://www.lonsec.com.au/lonsecgroup-conflicts-of-interest-statement/</u>. For more information refer to Lonsec Research Ratings Methodology available on our platform iRate or by contacting us on 1300 826 395.

Lonsec Holdings has appointed Australian Retirement Trust Pty Ltd ABN 88 010 720 840, AFSL 228975 as the provider of default superannuation services to its Group employees. Lonsec Holdings appointment of Australian Retirement Trust is not an endorsement of, or opinion on, the Fund.

Australian Retirement Trust is a subscriber to our services and pays a fee to us for this subscription service. Australian Retirement Trust rating and report is issued by an analyst who is aware of Australian Retirement Trust's appointment as default superannuation fund provider but who does not have a personal investment in the fund.

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