



OnePath Diversified Fixed Interest Trust

MMF1505AU Author: Isrin Khor Published: 17 May 2024

Data is provided by the manager at 31 Jul 2023, and currency in AUD, unless otherwise stated

Refer to glossary for definition of the rating

Product Review

About this Product

Investment manager	OnePath Funds Management Limited
Benchmark	50% Bloomberg AusBond Composite 0+ Year Index AUD / 50% Bloomberg Global Aggregate TR Index (AUD Hedged)
Product structure	Managed Fund
Inception date	Nov 2010
Asset class	Fixed Interest
Sector	Diversified Bonds
Peer group	Multi-Manager
Rated peers	6
Product size	\$436.00m

Product Characteristics

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

Annual Fees and Costs (% p.a.)

Management fees & costs	0.75
Performance fee costs	0.00
Net Transaction Costs	0.00
Buy/Sell Spread	0.06/0.06
Annual fees and costs	0.75

Source: FE fundinfo

Strengths

- The Fund is managed by an experienced investment team.
- Integration of the broader investment team has been progressing well to further enhance the Manager’s investment capabilities.
- Increased breadth of resources and tools, in particular manager research, asset allocation, performance analytics, governance and implementation teams.
- Robust and consistently applied investment process underpinning underlying manager selection and portfolio construction functions.

Weaknesses

- The Fund has a modest alpha target relative to the broader peer group and the fees charged.
- The complexity of managing an extensive breadth of heritage products with varying objectives, but this is being managed by the continued alignment of asset class building blocks and objectives.

Product Opinion

The Fund has maintained its 'Recommended' rating. There is high regard and conviction for the experience and calibre of the broader investment team. The Fund's rating is also driven by the robust and repeatable investment process. The increased resourcing from the combined heritage IOOF, OnePath and MLC businesses, provides further depth of expertise within investment management, asset allocation and risk management.

The alpha target of the Fund is considerably less than peers, especially in the context of the fee charged.

Lonsec Rating Model

Rating key: ●●● Above ●●● In-line ●●● Below		
Factor	Peer Rating	YoY Score Change
Business	●●●	—
Team	●●●	—
Process	●●●	—
ESG	●●●	—
Product	●●●	—
Fees	●●●	—
Performance	●●●	—

Allocation Profile

Core		
Satellite		
	Low Complexity	High Complexity

Return Profile

Income		
Capital		
	Defensive	Growth

Key Facts

Key Objectives

Investment objective	To provide income and achieve returns (before fees, charges and taxes) that exceed the Bloomberg AusBond Bank 0+Y Index over periods of three years or more.
Internal return objective	Outperform the Benchmark by 0.75% p.a. (before fees) over rolling three year periods.
Internal risk objective	Tracking error between 2.0-3.0% over rolling three year periods.
Non-financial objective	None

Asset Allocation (%)

Australian Fixed Interest	52.16
Global Fixed Interest	47.10
Cash	0.74
Total	100.00

Source: FE fundinfo

Rating History

18-Apr-2023	Recommended
14-Apr-2022	Recommended
17-Feb-2022	Fund Watch

Product Distribution Profile

Frequency	Quarterly
Last Missed Distribution	N/A
AMIT Election	Yes
TOFA Election	Yes

Top 10 Holdings (as at 31/07/2023)

	Weight (%)
Government Of Australia 2.5% 20-sep-2030	1.99
National Australia Bank Limited 0.0% 05-apr-2024	1.91
Government Of Australia 0.75% 21-nov-2027	1.16
Government Of The United States Of America Frn 31-jan-2025	1.15
New South Wales Treasury Corp. 2.0% 08-mar-2033	1.01
Government Of Australia 1.0% 21-dec-2030	0.99
Government Of Australia 1.0% 21-nov-2031	0.94
Government Of Australia 1.25% 21-may-2032	0.93
Government Of Australia 1.5% 21-jun-2031	0.93
Government Of Australia 1.75% 21-nov-2032	0.88

Source: FE fundinfo

Target Market Determination

Produced by issuer	Yes
Provided to Lonsec	Yes

Performance Analysis - annualised after fees at 31/10/2023

	1 Year	Median	2 Year	Median	3 Year	Median	5 Year	Median
Performance (% p.a)	0.03	0.15	-5.28	-5.16	-4.47	-4.26	-0.52	-0.33
Standard deviation	5.14	5.13	4.98	4.98	4.58	4.58	4.41	4.43
Excess return (% p.a)	0.58	0.70	0.16	0.28	0.22	0.43	-0.28	-0.10
Outperformance ratio (% p.a)	50.00	50.00	54.17	50.00	52.78	54.17	53.33	54.17
Worst drawdown (%)	-3.73	-3.61	-11.14	-11.05	-13.68	-13.25	-13.68	-13.25
Time to recovery (mths)	NR	-	NR	-	NR	-	NR	-
Sharpe ratio	-0.71	-0.66	-1.50	-1.46	-1.30	-1.20	-0.41	-0.35
Information ratio	0.55	0.67	0.09	0.15	0.15	0.31	-0.16	-0.06
Tracking error (% p.a)	1.04	1.04	1.86	1.80	1.55	1.54	1.73	1.73

Lonsec Peer Group: Fixed Interest - Diversified Bonds - Multi-Manager

Product Benchmark: 50% Bloomberg AusBond Composite 0+ Year Index AUD / 50% Bloomberg Global Aggregate TR Index (AUD Hedged)

Cash Benchmark: Bloomberg AusBond Bank Bill Index AUD

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

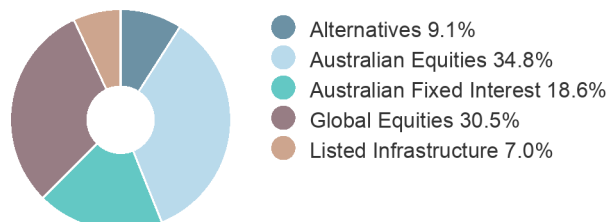
Business



Facts

% Staff Ownership	0-10%
Investment Manager	OnePath Funds Management Limited
Ultimate Parent Company	Insignia Financial Ltd
Headquarters	Australia
Inception Date	Oct 1985

AUM



Governance

% Independent board members	60
CEO as Chair	No
Separate Audit Committee	Yes
% Female board members	40
Independent chair	Yes

Metrics

Investment Management Headcount	200
Sales & Service	50
Investment Professionals	48
Distributor	Internal
Total AUM	\$19,474m

Who is the Manager?

The Manager is part of the Insignia Financial Group of companies, comprising Insignia Financial Ltd and its related bodies corporate ('Insignia Financial'), which is listed on the Australian Stock Exchange (ASX code: IFL). Insignia Financial is a leading provider of wealth management services including superannuation, platform administration and investment management and the Manager has a long heritage in multi-asset investing. Insignia Financial had total assets under management of \$138.9bn as at 31 July 2023.

Over recent years, the Manager has expanded their business through acquisitions and integration of the heritage IOOF, OnePath and MLC multi-manager businesses.

Lonsec Opinion

Profitability

The Manager is a large, profitable, and well-capitalised business. The Manager is considered a leading Australian provider of wealth management services and is one of the largest Australian multi-managers in Lonsec's universe. The Manager is considered to be in a strong financial position at these levels of AUM.

Business Track record

The Manager has a long and respected heritage in multi-asset investing. The Manager has expanded their business through acquisitions and has demonstrated success in integrating the heritage IOOF, OnePath and MLC multi-manager businesses in recent years, which is viewed positively.

Business Ownership

The Manager is 100% owned by ASX-listed IFL. The market capitalisation of IFL was \$1.5bn as at December 2023. Senior members own equity in the business, which is viewed positively.

Business Governance

The Manager has demonstrated multiple layers of compliance and risk monitoring, with oversight from multiple trustee boards, external board directors and separate audit committees. The Manager has not reported any regulatory findings in recent years.

Team



Key Decision Makers (KDM)

	Primary function	Dedicated to strategy	Appointed to strategy	Industry/Mgr exp. (yrs)	Exp. in PM roles (yrs)
Daniel Farmer	CIO	No	2013	28/14	27
Osvaldo Acosta	Portfolio Management	No	2016	23/7	22
Mark Nordio	Portfolio Management	No	2019	30/5	29

KDM Change*

No changes.

* Last 3 years

Profile

Structure	Centralised
Size	2
Turnover	Medium

Alignment

KDM equity held in manager	No
Performance-Based bonus	Yes
KDM co-investment in strategy	No
Long Term investment plan	No

Resources

	Number	Average Years Experience
Key decision makers	3	26
Portfolio Managers	21	25
Hybrid portfolio manager/analysts	-	-
Dedicated analysts	24	19
Dedicated dealers	8	18
Quantitative	4	16
ESG/Sustainability	2	29
Macro	-	-
Investment Specialists	11	-

Who is the Team?

Osvaldo Acosta and Mark Nordio are the Portfolio Managers of the strategy and are ultimately accountable for underlying fund manager selection, portfolio construction, ongoing monitoring, and performance. They are supported by the Investment Management Committee ('IMC') and the broader team. Dan Farmer is CIO of combined multi-manager businesses (IOOF, MLC, OnePath) effective 4 July 2022. Succession planning efforts also saw the appointment of Stanley Yeo as Deputy CIO and Head of Equities & Strategy in 2021. The IMC is responsible for overseeing and approving all investment decisions in the Fund including inclusions and exclusions of underlying managers. The Portfolio Analytics Team reports to Daniel Ackland and is a key resource within the research capability. The investment team is also able to leverage the asset consultant capabilities of JANA and Mercer in their research function.

Team *(continued)*



Lonsec Opinion

Skill

Acosta is a capable investor with the ability to manage a multi-manager portfolio throughout the investment cycle. Nordio is a seasoned investor and acts as the primary backup PM with substantial industry experience. Furthermore, Acosta and Nordio are supported by the broader team and asset consultants, with all investment proposals requiring approval from the IMC. There are meaningful synergies realised from the breadth of resources and significant collective industry experience of the combined businesses. The integration of the broader investment team has provided further depth of expertise within investment management, asset allocation and risk management capabilities.

Team Size

The fixed income team is relatively small and solely comprises Osvaldo Acosta and Mark Nordio. However, the broader investment team is well-resourced and is considered one of the largest teams compared to Lonsec peers. Resourcing has benefited from the combination of the heritage IOOF, OnePath and MLC businesses.

The Investment Team also leverages the research capabilities of its asset consultants which enhances the team's resourcing and provides support to the broader research offering.

Track Record/Co-Tenure

The senior members have long co-tenure at their respective heritage businesses. Although the co-tenure of the combined investment team is considered relatively short following the recent acquisitions, the team's integration has been progressing well with early encouraging signs of stability. Moreover, the combined heritage businesses can leverage the large scale and resourcing available to the investment team to assist in the transition process. The Investment Committee members have remained largely the same through the combinations and have a long co-tenure between them.

Alignment

The alignment of interest to investors is considered to be moderate and in line with peers. The majority of the remuneration is directly linked to the three to five year performance of the multi-manager range of funds, with a deferral component which promotes further alignment across the team.

Key Person Risk

Key person risk is considered to be low to moderate and centered primarily on the Senior Portfolio Managers due to their extensive experience and leadership of investment strategies. Positively, the risk is partially mitigated by the team-based decision making approach and extensive resources and the utilisation of the deeply resourced asset consultant capabilities.

Process

What is the Investment Process?

The Fund is a single-sector, multi-manager product that emphasises manager skill and quality within the portfolio. The process is intuitive and employs interest rate overlays and strategic tilting to assist in managing the underlying exposures based on their outlook on the fixed income market. The Fund evaluates credit research, macroeconomic cycle, duration and security selection considerations.

The IMC ultimately considers and approves allocation decisions and manager appointments. The asset consultants, Mercer and JANA support the decision-making and guide the manager selection and strategic tilting process. The Fund’s investment guidelines and well-defined risk limits ensure the portfolio maintains appropriate diversification. The risk process is methodical as the managers are selected based on their contribution to the pre-defined active risk in conjunction with their alpha generation potential.

Lonsec Opinion & Supporting Facts

Philosophy and Universe

Investment Style	Multi-Manager, Single Sector
Sector Exposure	Active
Available Universe	Managed Funds (Fixed Income Multi-Manager Products). Underlying securities include Australian bonds, global multi-sector bonds, investment-grade credit, high yield, inflation linked bonds, emerging market debt, and cash.

The fully diversified investment approach of combining high-quality active managers to provide optimal returns in the long term and passive management to lower costs and active risk in certain asset classes fully reflects the philosophy and risk and return objectives. The single-sector strategies aim to deliver a repeatable investment portfolio that generates superior risk-adjusted returns over the longer term.

The Manager believes in a style-neutral approach which amplifies exposure to manager skill and quality at the aggregate level. The foreign currency exposures are largely hedged back to Australian dollars. In doing so, the Manager employs their discretion in managing factors such as credit and duration based on their belief around market outlook and in managing their risk positions. The philosophy is predicated on the belief that active managers can outperform sector benchmarks and that in-depth research can enhance alpha generation. The research efforts leverage the broader organisation's substantial scale and blend both quantitative and qualitative research to deliver alpha through the cycle.

Research Process

Idea generation	Investment Team, Asset Consultants, Economic Research, Third-Party Resourcing
Managers actively tracked	40
External consultant	Mercer and JANA
Annual manager meetings	200

The Manager implements a robust and consistently applied process underpinning manager selection and portfolio construction functions. The process leverages the investment team scale and combined heritage businesses. The process aims to create a narrow universe of managers that have been stringently filtered by their suitability for the Fund. The process considers quantitative and qualitative factors in a detailed and transparent manner. The underlying funds undergo a rigorous review and multiple layers of oversight by the IMC, investment team and asset consultants, with the IMC ultimately approving manager inclusions.

The process employs an active ‘Strategic Tilting’ framework to manage portfolio exposures and improve the risk and return outcomes. The ‘Strategic Tilting’ process is complemented by an Interest Rate Overlay, whereby the Fund’s duration profile is managed. The Manager utilises sophisticated tools and systems to manage the portfolios. There is ongoing idea generation from the individual sector specialists, portfolio managers and asset consultants. The utilisation of Mercer and JANA adds rigour to the process. The depth and breadth of Mercer and JANA’s asset allocation and manager coverage are viewed positively.

Process (continued)



Portfolio Construction

Portfolio decision making	PM based
Use of mandates	Yes
Use of alternatives	No
Allocation to related/affiliated exposure	Yes
Typical security numbers	N/A

The Fund is constructed via active manager selection while maintaining meaningful active security and sector positioning. The active risk and return targets are set, and managers are selected and blended to fill the risk budget, with each manager's contribution to risk being commensurate with their expected contribution to the alpha target. The Manager also utilises derivatives and an 'Interest Rate Overlay' strategy to manage the Fund's risk factor exposures. The underlying managers are typically accessed via separately managed accounts enabling the Manager to tailor mandates to its requirements. The Manager has displayed strong discipline in removing underperforming strategies where warranted.

Capacity Management

The capacity is not a material consideration given the nature of the underlying exposures within the portfolio.

Investment Risk Management

Monitoring external to investment team	Yes
Frequency of monitoring	Daily
Primary risk management system	Barra, FactSet
Max illiquid	20%
Security / issuer limit (min./max)	Not stated
Sector / segment limits (min./max)	Duration (+/-2 Years against Benchmark), Max sub-investment grade credit 20%
Cash Allocation (Typical, Max.)	<1% (typical), 25% (max)

The risk management function is well-integrated within the investment process. The risk management oversight is handled by the Investment Operations team which utilises tools such as FactSet, MercerInsight, Bloomberg and Barra to monitor the portfolio in a timely manner. The Manager has integrated compliance systems that enable ongoing monitoring of underlying mandates to be implemented to ensure compliance with their predefined guidelines. The team closely monitors manager portfolios on a daily basis and investigates daily any excess return outliers exceeding the 99% confidence level. The Fund's investment guidelines and risk limits are well-defined to ensure the portfolio maintains appropriate diversification. The Portfolio Manager can use interest rate derivatives (limited to 20% of NAV) for pure risk management purposes and is not designed to generate alpha.

ESG

Manager Positioning

ESG approach	Risk or Value
Sustainability thematic	None
Responsible investment style	ESG Integration
Non-financial objective	None

What is the Manager’s ESG approach?

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

Overview

ESG Process Score	ModLow
Responsible Investment strategy risk: Clarity, measurability & reporting	N/A

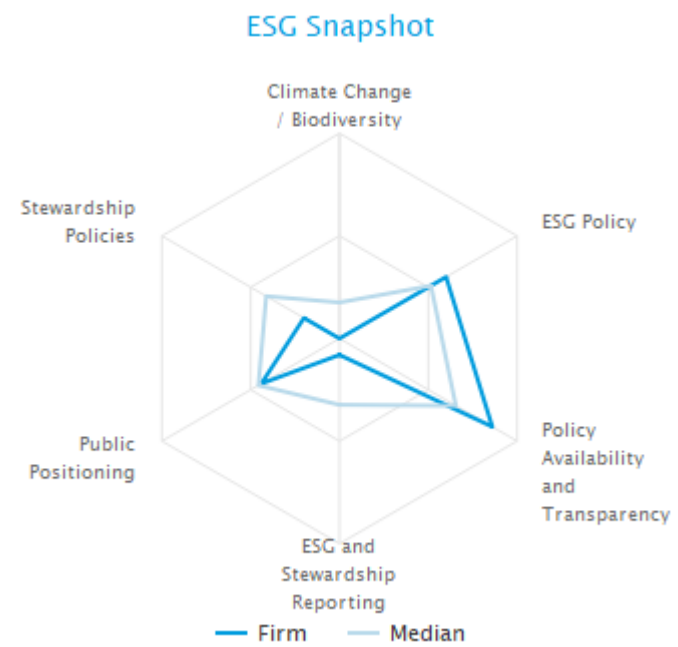
Product Level Approach

ESG integration assessment for multi asset funds such as this, reviews only the ESG components of the selection underlying strategies or managers, and not the ESG integration of each of the underlying funds or strategies. While the Manager does have some minimum standards for Manager selection and monitoring they are seen by Lonsec as being very light touch. There are no signs that company engagement on ESG issues is a component of the Manager's current investment approach for this Fund.

While ESG does not form a component of the compliance framework, portfolio disclosure is leading.

Strategy: Clarity, Measurability & Reporting

This product does not make any specific claim to being a sustainable, ethical or impact offering. As such Lonsec does not apply its alignment review to the product and thus scores its risk of misalignment as N/A.



Manager Level Approach

The Manager’s overall ESG policy framework and disclosure are significantly lagging peers. The Manager has articulated a commitment to the integration of ESG within their investment process, however, there is little evidence in their public positioning. The Manager does not appear to have ESG related policies publicly available, nor has the Manager provided any policy frameworks. No reporting on voting or engagement outcomes is publicly available.

Product



Service Providers

Responsible entity	OnePath Funds Management Limited
Investment manager	OnePath Funds Management Limited
Sub-investment manager	N/A
Custodian	JPMorgan
Administrator	OnePath Funds Management Ltd
Fund Auditor	KPMG
Change in Key Providers? (Over last 12 months)	No

Product Details

Product size	\$436.00m
Fund 12-month net flows	Negative
Distribution model	Internal
Buy/sell spreads	0.06/0.06
Net transaction costs	0.00
Product type	Managed Fund
Use of derivatives	Yes - Hedging Only
Currency hedged	Fully hedged
Types of derivatives	Forwards, Futures and Swaps

What is the Product Structure?

The Fund is a multi-manager, single-sector unit fund and is a registered managed investment scheme ('MIS') with a related party as a Responsible Entity. The Fund provides exposure to a diversified range of Australian and global fixed income securities via several underlying managers.

Lonsec Opinion

Service Providers

The Manager employs high quality 'tier 1' service providers. The RE has built experience in operating and managing a number of schemes over an extended period of time and is expected to have a governance framework in place to deal with any perceived conflicts of interest.

Operational 'Red Flags'

Given the Fund's typical investment universe, the investment strategy is not operationally challenging to implement. There have been no regulatory findings lodged over the previous 12 months. Given the Fund's Net Transaction Costs are nil, the Buy/Sell spread is well-defined.

Wind-up Risks

The Onepath diversified suite has been experiencing outflows over the medium term which heightens to an extent the potential for wind-up risk if this outflow trend was to materially accelerate.

Fees

Annual Fees and Costs (% p.a.)	
Management fees & costs	0.75
Performance fee costs	0.00
Net Transaction Costs	0.00
Buy/Sell Spread	0.06/0.06
Annual fees and costs	0.75

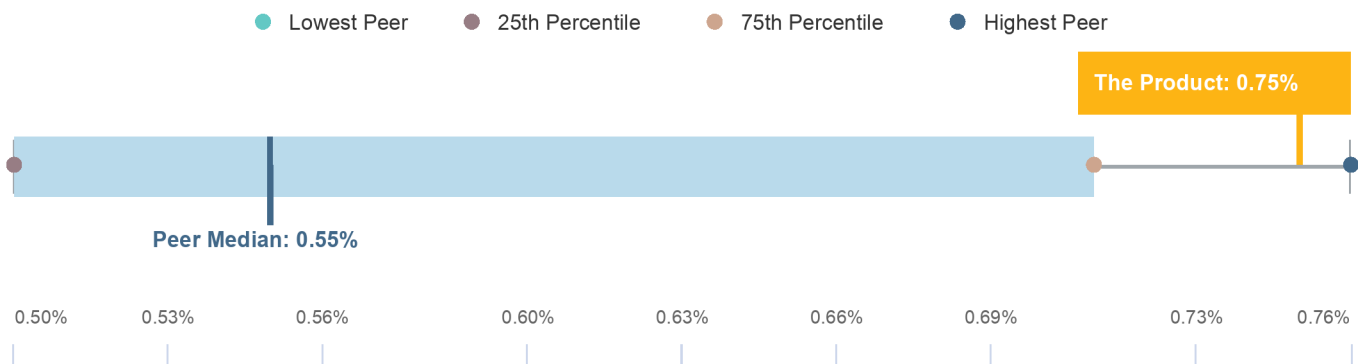
Source: FE fundinfo

Performance Fees	
Applicable	No

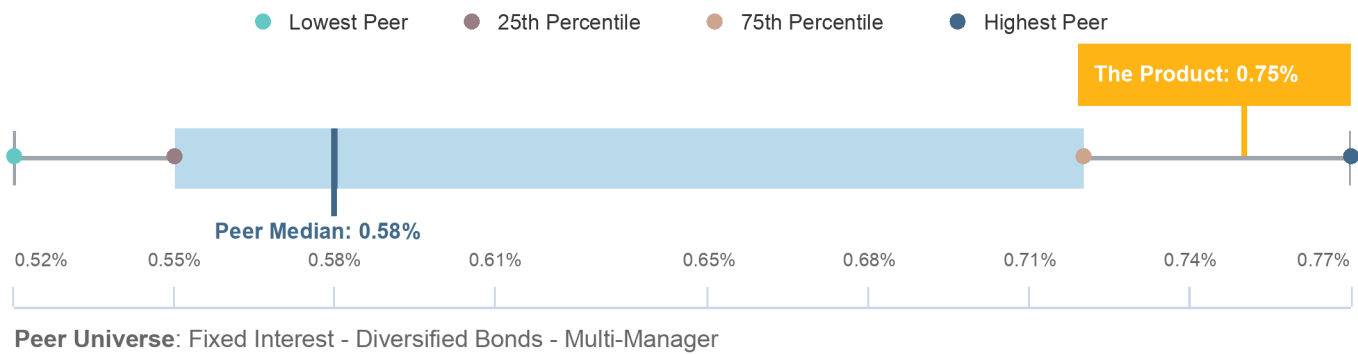
Fees Explained

As per the PDS dated 1 December 2023, the Fund charges 0.75% p.a. in 'Management fees and Costs'. The Fund charges no net transaction costs or performance fees.

Management Fees and Costs Peer Comparison (31/07/2023)



Annual Fees and Costs Peer Comparison (31/07/2023)



Lonsec Opinion

Annual Fees and Costs

The AFC (0.75% p.a.) is considered high relative to its peer group.

Fairness

The Fund aims to achieve a before-fee alpha target of 0.75% p.a. and then charges 0.75% p.a. in annual fees and costs. In addition, the Fund has not met this objective consistently in the past.

Performance data is as at 31 October 2023

Performance

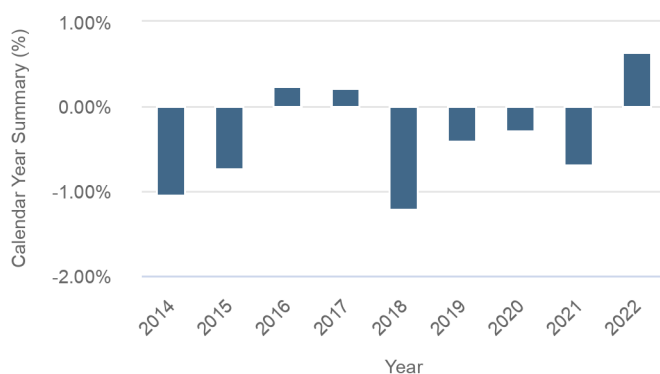
Performance Summary

PDS return objective	To provide income and achieve returns (before fees, charges and taxes) that exceed the Bloomberg AusBond Bank 0+Y Index over periods of three years or more.
Internal return objective	Outperform the Benchmark by 0.75% p.a. (before fees) over rolling three year periods.
Internal risk objective	Tracking error between 2.0-3.0% over rolling three year periods
Product benchmark	50% Bloomberg AusBond Composite 0+ Year Index AUD / 50% Bloomberg Global Aggregate TR Index (AUD Hedged)
Lonsec peer group	Multi-Manager

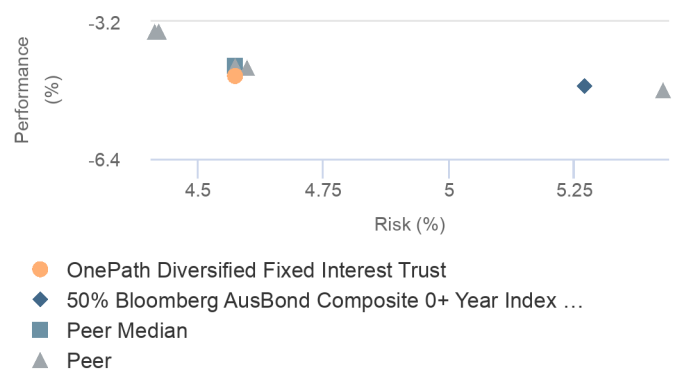
Alpha Generation

The Fund has slightly underperformed the peer median over rolling three and five year periods. Additionally, the Fund has failed to meet its internal target objective over a three year periods.

Calendar Year Excess Return



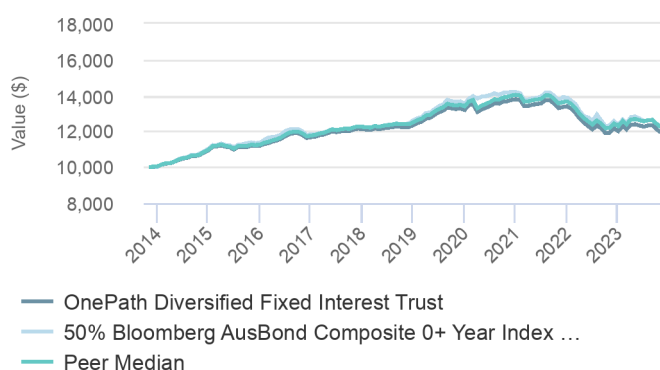
3 Year Risk and Return



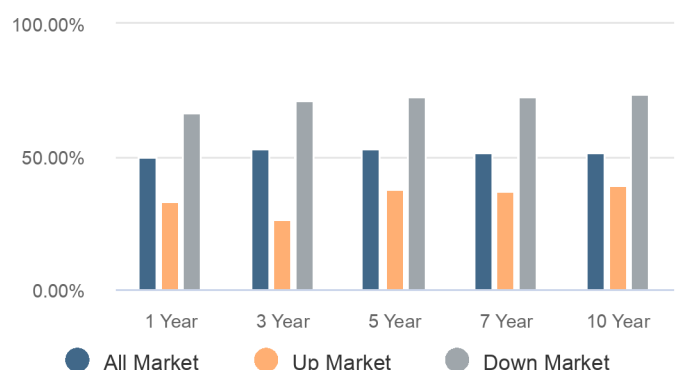
Alpha Consistency

The Fund has not consistently met the investment objective over the long term. Lonsec is seeking performance improvement following the restructure of the Fund, although there are positive early signs in short term performance.

Growth of \$10,000 Over 10 Years



Returns Consistency



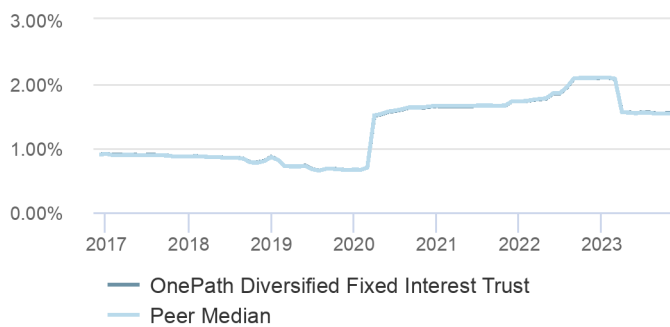
Performance data is as at 31 October 2023

Performance (continued)

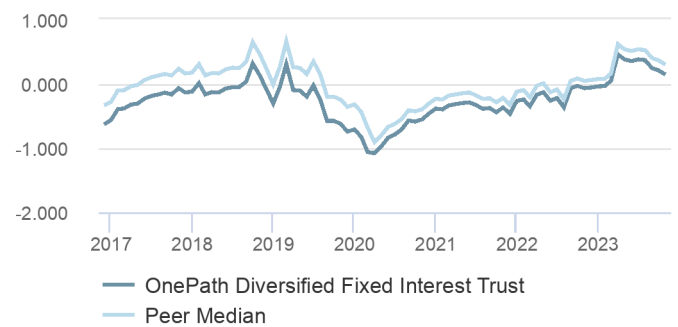
Benchmark Relativity

The Fund's tracking error is in line with peers over all time periods evaluated and has remained below the target limit of 2.0% over rolling three year periods. The Fund is considered to be as active as peers however this activeness has not been as well rewarded.

3 Year Rolling Tracking Error Over 7 Years



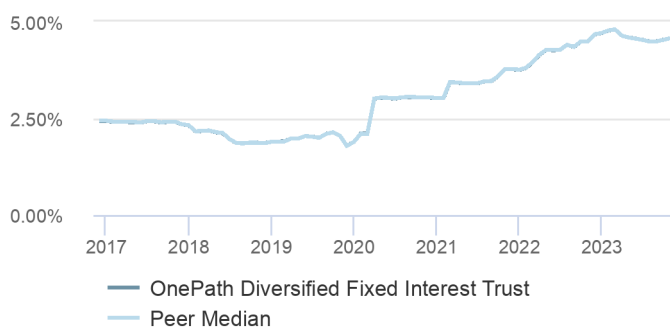
3 Year Rolling Information Ratio Over 7 Years



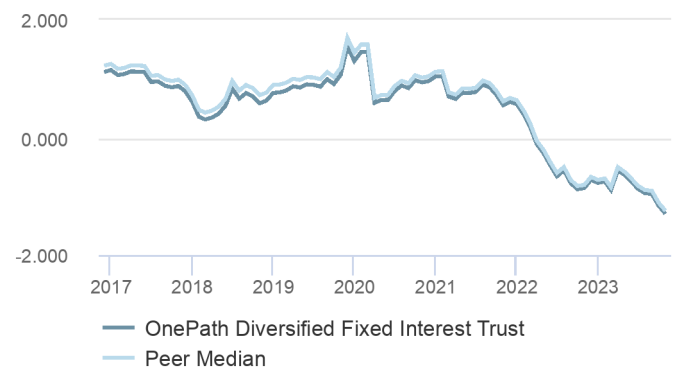
Return Volatility

The Fund's volatility has remained largely in line with peers over all time periods assessed. The weaker relative performance has resulted in lower Sharpe and information ratios over rolling three and five year periods.

3 Year Rolling Standard Deviation Over 7 Years



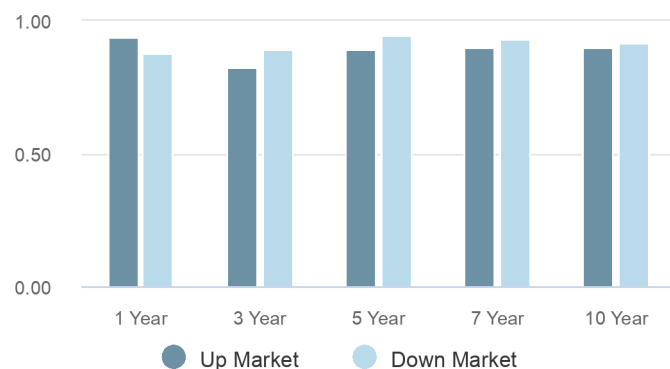
3 Year Rolling Sharpe Over 7 Years



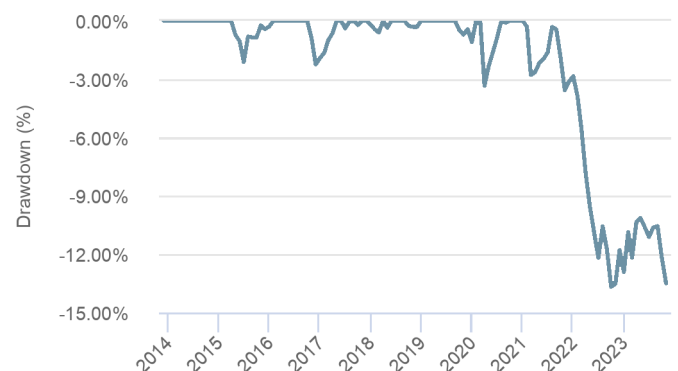
Product Defensiveness

The Fund's worst drawdowns have been largely in line with the peer median over three and five year periods. Some defensiveness is exhibited by performing better in down markets with the Market Capture ration being below one.

Market Capture Ratio



Drawdowns



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.

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Disclosures (continued)

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Lonsec Research FSG

Financial Services Guide

Lonsec Research

9 June 2023

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

Lonsec Research provides in-depth, investigative investment research across a broad range of listed and unlisted investments. Lonsec Research is a wholly owned subsidiary of Lonsec Holdings Pty Ltd (ABN 41 151 235 406) (Lonsec Holdings). 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: info@lonsec.com.au

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 of 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. 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.

Lonsec Research FSG (continued)

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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.

Generation Development Group Limited (ACN 087 334 370), a shareholder of Lonsec Holdings, is the parent company of Generation Life Ltd who issue a series of products rated by Lonsec Research. Lonsec Research manages this potential conflict by disclosing to investors accessing our research of Generation Life related products, and implementing our comprehensive ratings process, information barriers and monitoring program. For more information refer to Lonsec Research Ratings Methodology available on our platform iRate or by contacting us on 1300 826 395.

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This FSG was prepared on 9 June 2023.