MLC MultiActive Property

WPC0012AU Author: Chris Serpesedes Published: 30 Apr 2025

Data is provided by the manager at 30 Jun 2024, and currency in AUD, unless otherwise stated



Product Review

About this Prod	uct
Investment manager	IOOF Investment Services Ltd
Benchmark	FTSE EPRA/NAREIT Developed Rental ex Aus NR Index (AUD Hedged)
Product structure	Managed Fund
Product size	\$84.74m
Inception date	Nov 2005
Asset class	Property and Infrastructure
Sector	Global Listed Property
Peer group	Multi-Manager
Rated peers	3

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Business Life Cycle	Mature
Product Wind-Up Risk	Medium
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	In line with median

Annual Fees and Costs (% p.a.)

()	
Management fees & costs	0.87
Performance fee costs	0.00
Net Transaction Costs	0.19
Buy/Sell Spread	0.20/0.20
Annual fees and costs	1.06

Source: FE fundinfo, PDS Date: 30/Sep/2024

Product Opinion

The Fund has maintained its 'Recommended' rating. This rating reflects the high regard and conviction in the experience and calibre of the broader investment team and their ability to execute the investment process. The continued consolidation of the heritage businesses provides depth of expertise across the investment process.

However, there remains an extensive breadth of heritage products with various objectives, although these continue to be aligned. The Fund has also failed to achieve its internal risk objective around targeted tracking error at the time of this review.

Lonsec Rating Model

Below
Change

Allocation Profile

Core		
Satellite		
	Low Complexity	High Complexity

Return Profile

Income		
Capital		
	Defensive	Growth

Strengths

- The Fund is managed by an experienced and well-led investment team.
- Breadth of investment resources and tools pertaining to manager research, asset allocation, performance analytics, governance and implementation teams.
- · Robust and consistently applied investment process underpinning manager selection and portfolio construction functions.
- Integration of the broader investment team has been progressing well to further enhance the Manager's investment capabilities.
- · Consistently outperformed the benchmark and peers over the medium and long term.

Weaknesses

- 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.
- The Fund has not achieved its internal risk objective around targeted tracking error at the time of this review.



Key Facts

Key Objectives

Investment objective	To provide long-term capital growth and income by investing predominantly in a diversified portfolio of listed international and Australian real estate securities, and to achieve a total return after fees in excess of the Benchmark over seven years.
Internal return objective	To outperform the Benchmark by 2.0% p.a. (before fees) over rolling five-year periods.
Internal risk objective	Targeted Tracking Error of less than 5.0% p.a. over rolling five-year periods.
Non- financial objective	None

Asset Allocation (%) (as at 31/12/2024)

Listed Property	99.41
Unlisted Property	-
Cash	0.59
Total	100.00
Source: FE fundinfo	

Rating History

14-May-2024	Recommended
19-Apr-2023	Recommended
11-Apr-2022	Recommended

Product Distribution Profile

Frequency	Quarterly
Last Missed Distribution	None
Number of Missed Distributions in the last 5 years	0
AMIT Election	Yes
TOFA Election	No

Top 10 Holdings (as at 31/12/2024)

	Weight (%)
WELLTOWER INC.	8.890
DIGITAL REALTY TRUST, INC. USD0.01	6.920
EQUINIX INC	6.210
PROLOGIS INC	5.130
SIMON PROPERTY GROUP, INC.	4.270
KIMCO REALTY CORPORATION	3.430
INVITATION HOMES INC	3.120
SUN COMMUNITIES INC	2.600
VENTAS INC	2.100
FEDERAL REALTY INVESTMENT TRUST NPV	2.010
Source: FE fundinfo	

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)	2.63	2.63	5.43	5.43	-5.43	-6.67	-0.15	-0.51
Standard deviation	13.85	13.85	15.96	16.08	17.34	18.04	16.65	18.51
Excess return (% p.a)	0.43	0.43	0.60	0.60	1.37	0.13	1.46	1.11
Outperformance ratio (% p.a)	41.67	41.67	45.83	45.83	44.44	47.22	46.67	48.33
Worst drawdown (%)	-8.04	-8.04	-14.03	-14.29	-26.59	-29.50	-29.48	-31.85
Time to recovery (mths)	NR	NR	2	9	NR	NR	NR	NR
Sharpe ratio	-0.13	-0.13	0.08	0.08	-0.50	-0.54	-0.13	-0.13
Information ratio	0.17	0.17	0.22	0.22	0.37	0.04	0.22	0.22
Tracking error (% p.a)	2.49	2.49	2.67	2.67	3.67	3.67	6.62	5.26

Lonsec Peer Group: Property and Infrastructure - Global Listed Property - Multi-Manager **Product Benchmark:** FTSE EPRA/NAREIT Developed Rental ex Aus NR Index (AUD Hedged)

Cash Benchmark: Bloomberg AusBond Bank Bill Index AUD

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



Business •••

Facts	
Investment Manager	IOOF Investment Services Ltd
Ultimate Parent Company	Insignia Financial Ltd
Headquarters	Australia
Inception Date	Jan 1846
% Staff Ownership	0-10%



AUM

Governance

100
67
Yes
No
Yes

Metrics

Total AUM	\$24.80b
Investment Management Headcount	200
Investment Professionals	49
Sales & Service	50
Distributor	Internal

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. The Manager has a long history in multi-asset investing, with a total funds under management and administration ('FUMA') of \$301.00b as at June 2024. 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 a leading Australian wealth management service provider and one of the largest Australian multi-managers in the multi-asset universe. The Manager is in a strong financial position at these levels of AUM with consistent profitability in recent times. The Manager also has a diversified asset base with a broad range of client types, which enhances the profitability profile.

Business Track record

The Manager has a long and respected heritage in multi-asset investing. The Manager has a considerable track record in managing multi-asset, superannuation and passive strategies. 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 Insignia Financial Limited (ASX: IFL) with a market capitalisation of \$3.08b as at January 2024. The senior members of the organisation own equity in the business, which is viewed positively and promotes alignment endeavours. That said, the business ownership from employees is estimated at 0-10% which is relatively in line with other multi-asset peers.

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)
Liam Wilson	Portfolio Management	No	2022	22/19	19
Stanley Yeo	Portfolio Management	No	2021	25/15	25
Daniel Farmer	CIO	No	2013	28/14	28

KDM Change*

No changes.

Profile

Size	8
Structure	Decentralised
Turnover	Medium
Alignment	
KDM equity held in manager	No
KDM co-investment in strategy	No
Performance-Based bonus	Yes
Long term incentive plan	No

Resources

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	Number	Average Years Experience
Key decision makers	3	25
Portfolio Managers	23	25
Hybrid portfolio manager/ analysts	-	-
Dedicated analysts	11	14
Dedicated dealers	5	19
Quantitative	-	-
ESG/Sustainability	1	29
Macro	-	-
Investment Specialists	6	22

Who is the Team?

The Global Equities & Strategy Team is overseen by Liam Wilson, who is ultimately responsible for overseeing the strategy. Wilson is supported by his direct back-up in Deputy CIO and Head of Equities & Strategy, Stanley Yeo. Wilson is supported by the broader MLC Asset Management Investment Team ('Investment Team') which consists of 49 members in total, with responsibilities broadly segmented by Portfolio Construction, Portfolio Enablement and Special Capabilities functions.

The key decision makers responsible for asset allocation across all portfolios are supported by the Sector Portfolio Management ('SPM') team for sector-specific manager research, the Derivatives team and the Investment Portfolio Analytics team. The investment team is also able to leverage the asset consultant capabilities of JANA in their research function.

The Investment Management Committee ('IMC' or 'IC') is responsible for overseeing and approving all investment decisions in the strategy, including inclusions and exclusions of underlying managers. The IMC comprises Anthony Hodges (Chairman, External member), Denise Allen, Mary-Anne Nunan (external), Dan Farmer, Stanley Yeo and Osvaldo Acosta.

^{*} Last 3 years



Team (continued)



Lonsec Opinion

Skill

Wilson and the supporting global equities team has exhibited demonstrable skill in managing the strategy. Wilson is supported by the broader team and asset consultant, with all investment proposals requiring approval from the respective investment committees across the MLC and IOOF heritage businesses. The senior team members, including CIO, Dan Farmer, are highly experienced with the appropriate skillset to manage the multi-asset and single-sector portfolios.

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 Global Equities and Strategy Team is well-resourced and is one of the largest teams amongst single-sector, multimanager peers. The team comprises eight individuals including Portfolio Manager, Liam Wilson and back-up Portfolio Manager, Stanley Yeo. The team resourcing has benefited from the combination of the heritage IOOF, OnePath and MLC businesses in previous years. The investment team also leverages the research capabilities of its asset consultant, which enhances the team's resourcing and supports the broader research offering. The broader investment team continues to experience some residual turnover given the continued consolidation between the heritage businesses.

Track Record/Co-Tenure

The senior members have long co-tenures at their respective heritage businesses. Although the co-tenure of the combined investment team is still developing following the acquisition, the team's integration is progressing well with continued stability. Moreover, the combined heritage businesses can leverage the large scale and resources available to the investment team. The IC members have remained largely the same through the consolidation process and have a long cumulative co-tenure.

Alignment

The alignment of interest to investors is considered to be stronger than peers. The majority of the remuneration is directly linked to the three to five-year performance of the multimanager range of funds, with a deferral component that promotes further alignment across the team. The broader Insignia organisation represents a fully aligned remuneration structure across the different businesses after the FY23 review.

Key Person Risk

The Key Person Risk ('KPR') is considered to be lower and centered primarily on the key decision makers due to their extensive experience and leadership of investment strategies. Positively, the risk is partially mitigated by the team-based decision-making approach, 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 utilises a style-neutral approach, emphasising manager skill and quality within the portfolio. The Fund is highly concentrated in two underlying managers, given the nature of the global property sector. The Managers comprise different styles to maintain style neutrality. The Manager constructs portfolios with the belief that active manager selection via qualitative and quantitative analysis of their universe will generate long-term outperformance.

The Sector Portfolio Management ('SPM') team constructs the asset classes predominantly using external managers. External managers are sourced using external databases, market contacts and advice from the asset consultant. The internal team undertakes its manager's research but has the asset consultant's input.

Investment governance is enacted through the Investment Committee (IC), which oversees all major aspects of the investment process and requires IC approval at key points, such as external manager changes.

The Fund's investment guidelines and risk limits ensure the portfolio maintains appropriate diversification. 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
Sector Exposure	Active
Available Universe	Managed Funds (Multi-Manager Property Products)

The fully diversified investment approach of combining highquality active managers to provide optimal returns in the long term 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 that amplifies exposure to manager skill and quality at the aggregate level. The philosophy is predicated on the belief that active managers can outperform sector benchmarks and that in-depth research can enhance alpha generation. The Manager seeks to generate returns through active manager selection and blending investment styles while maintaining meaningful active stock and sector positioning. 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
Annual manager meetings	26
Managers actively tracked	8
External consultant	JANA

The Manager implements a robust and consistently applied research process underpinning external manager selection and portfolio construction functions. The external manager research process, which considers both quantitative and qualitative factors, is detailed and transparent. The process leverages the investment team's scale and combined heritage businesses. The process aims to create a narrow universe of managers with complementary styles who have been stringently filtered for their suitability.

There is an ongoing flow of ideas from the individual sector specialists who are responsible for constructing the portfolio, portfolio managers and their consultant, JANA. The underlying funds have undergone multiple layers of oversight from the investment team, asset consultants, with the IC ultimately approving the manager inclusions. The depth and breadth of JANA's asset allocation capabilities and manager coverage are viewed positively. The Manager has access to sophisticated tools and systems to manage these multi-manager portfolios.



Process (continued) •••

Portfolio Construction

Portfolio decision making	PM based
Typical security numbers	110
Use of mandates	Yes
Use of alternatives	No
Allocation to related/affiliated exposure	No

The Fund is constructed via active manager selection and blends various styles while maintaining meaningful active stock 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 to supplement the process as an exposure and risk management tool, with encouraging results.

The underlying managers are typically accessed via separately managed accounts, enabling the Manager to tailor mandates to its requirements. In addition, this structure can facilitate tighter portfolio construction, efficient implementation, better product design control, better pricing opportunity and improved tax efficiency for investors.

The Manager has displayed strong buy/sell discipline in manager selection, where funds have undergone a rigorous review process by the MLC and JANA investment teams and have received approval from the IC.

Capacity Management

Although the FUM is considered large, there are no concerns in terms of capacity given the opportunity set for multi-manager global property strategies.

Investment Risk Management

Monitoring external to investment team	Yes
Frequency of monitoring	Daily
Primary risk management system	Barra and FactSet
Security / issuer limit (min./max)	None
Sector / segment limits (min./max)	None
Max illiquid	0%
Cash Allocation (Typical, Max.)	0%

The structure of the risk management functions is well embedded within the investment process. Although the process is continually evolving given the broader organisational consolidation, the Manager has integrated compliance systems that enable ongoing monitoring of underlying mandates to be implemented to ensure compliance with their predefined guidelines. The Manager closely monitors manager portfolios and weightings on a daily basis and investigates daily any excess return outliers exceeding the 99% confidence level, which adds rigour.

The monitoring and compliance functions conducted by separate teams are considered to be thorough and at the higher end of the peer group. The Fund's investment guidelines, well-defined asset class ranges and limits are well-suited to ensuring the portfolio maintains appropriate diversification.



ESG •••

Manager Positioning - Product

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

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

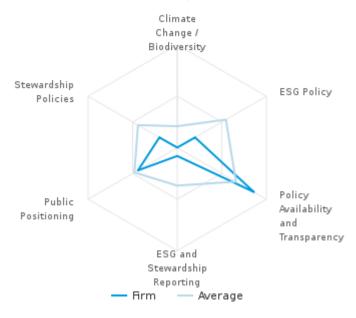
The Manager has indicated that their Responsible Investment style is "ESG Integration" and as such that they take Environmental, Social, and Governance factors into consideration when assessing investment opportunities. With a primary ESG style of "Risk or Value", Managers will determine inclusion based 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' perceptions 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

ESG Snapshot



Product Level Approach

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, however, incorporate climate risk into their capital market assumptions for this product. While this fund does apply screens at the overall portfolio level, systems for monitoring, on a look-through basis, are not evident. While the Manager has some minimum documentation requirements for Manager selection, there are limited requirements as to incorporating ESG elements into its manager selection process. There are no minimum standards or policy requirements.

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 is committed to integrating ESG within their investment process with evidence of public positioning and policy framework. The responsible investing, proxy voting, and engagement policies are available on the firm's website. However, the level of disclosure concerning proxy voting policy and engagement policy is considered behind that of peers, with both policies lacking depth, which is reflected in their Stewardship Policies score. While reporting on voting outcomes is broadly in line with peers, no reporting on engagement outcomes is publicly available.



Product •••

Service Providers	
Responsible entity	IOOF Investment Services Ltd
Investment manager	IOOF Investment Services Ltd
Sub-investment manager	N/A
Custodian	J.P. Morgan
Administrator	IOOF Investment Services Limited
Fund Auditor	KPMG
Change in Key Providers? (Over last 12 months)	No

Product Details	
Product size	\$84.74m
Fund 12-month net flows	Negative
Distribution model	Internal
Buy/sell spreads	0.20/0.20
Net transaction costs	0.19
Product type	Managed Fund
Use of derivatives	Yes
Currency hedged	Fully
Types of derivatives	Forwards, Futures and Swaps

What is the Product Structure?

The Fund is a multi-manager, single-sector unit fund that provides exposure to a diversified range of global property securities via several underlying managers. The Fund is a registered managed investment scheme ('MIS') for which IOOF Investment Services Ltd is the responsible entity (the 'RE'), a related entity. The RE is responsible for operating and managing the MIS, holds an AFSL and as such is required to comply with its AFSL and RE obligations as outlined under the Corporations Act.

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. However, the underlying exposures comprise global listed property securities which exhibit lower liquidity during stressed markets. There have been no regulatory findings lodged over the previous 12 months.

Wind-up Risks

At the current levels of AUM, the Fund's wind-up risk is considered to be moderate given it is established with a stable level of flows in recent years. Further, there is strong support from Insignia's extensive distribution network, which reduces the wind-up risk.



Fees •••

Annual Fees and Costs (% p.a.)	
Management fees & costs	0.87
Performance fee costs	0.00
Net Transaction Costs	0.19
Buy/Sell Spread	0.20/0.20
Annual fees and costs	1.06
Source: FE fundinfo, PDS Date: 30/Sep/2024	

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Performance Fees

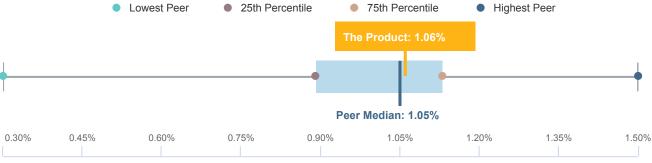
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Fees Explained

The Fund applies a flat management fee, transaction costs with a bid/offer spread. No performance fees are applied by the Fund directly. The Fund, however, can pass on a performance fee if the underlying managers within the strategy charge performance fees.

Management Fees and Costs Peer Comparison





Peer Universe: Property and Infrastructure - Global Listed Property

Lonsec Opinion

Annual Fees and Costs

The Fund's AFC is in line with the peer median.

Fairness

The Fund's fairness is moderate as the fee load is lower than peers whilst providing a concentrated exposure to the G-REITs space. The underlying exposure is simplistic as it comprises two managers. The Fund's investment objectives are sufficient, as it targets an adequate level of alpha on the post-fees internal investment objective. However, it represents a higher cost exposure compared to its similar MLC Wholesale Global Property Fund counterpart.



Performance data is as at 31 December 2024

Performance



Performance Summary

PDS return objective	To provide long-term capital growth and income by investing predominantly in a diversified portfolio of listed international and Australian real estate securities, and to achieve a total return after fees in excess of the Benchmark over seven years.
Internal return objective	To outperform the Benchmark by 2.0% p.a. (before fees) over rolling five-year periods.
Internal risk objective	Targeted Tracking Error of less than 5.0% p.a. over rolling five-year periods.
Product benchmark	FTSE EPRA/NAREIT Developed Rental ex Aus NR Index (AUD Hedged)
Lonsec peer group	Multi-Manager

Alpha Generation

The Fund's alpha generation has been moderate to high, as it has exhibited outperformance over the peer median over the medium and long term. The Fund has outperformed the benchmark across all periods whilst delivering on its investment objective at present. The Fund's alpha generation is supported by the outperformance through the cycle.



18 19

Risk (%)

MLC MultiActive Property

FTSE EPRA/NAREIT Developed Rental ex Aus NR I...

3 Year Risk and Return

Peer

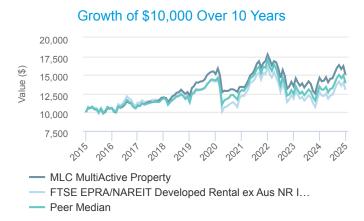
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-6

Performance (%)

Alpha Consistency

The Fund's alpha consistency has been high, as it has outperformed the peer median and benchmark over the medium and long term. The Fund has outperformed the benchmark over the short term, whilst being in line with peers over the same period. The Fund has achieved its internal outperformance objective consistently. The alpha generation is supported by the ability to deliver on the investment objectives consistently.





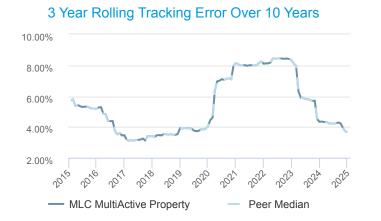


Performance data is as at 31 December 2024

Performance (continued)

Benchmark Relativity

The Fund's rolling tracking error has been in line with the peer median over most periods. The Fund has failed to deliver on its internal risk objective. The Fund's rolling information ratio has been broadly in line with peers across most periods, except for the medium term, whereby it is higher than the peer median. The Fund's information ratio has been greater than zero across all periods, indicating a moderate reward for active risk.





Return Volatility

The Fund's volatility (as measured by standard deviation) has been lower than the peer median across the medium and long term, whilst being in line over the short term. The Fund's Sharpe Ratio has been in line or higher than the peer median across most periods. As such, the Fund has generated risk-adjusted returns that are in line with the peer median through the cycle.

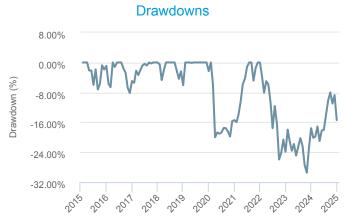




Product Defensiveness

The Fund's worst drawdowns have been smaller than the peer median over the medium and long term, whilst being in line over the short term. The Fund's time to recovery is in line with peers across all periods except the short term. The Fund has delivered outperformance relative to the benchmark in down-markets, as it has delivered a downside capture ratio below one.





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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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: 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 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.

Lonsec Research FSG (continued)

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

This FSG was prepared on 1 August 2024.