Lonsec

MLC MultiActive Australian Shares

IOF0092AU Author: Isrin Khor Published: 14 May 2024

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

Australian Large Cap



Product Review

Albanit Haia Dasahnat

About this Product	
Investment manager	IOOF Investment Services Ltd
Benchmark	S&P/ASX 300 TR Index AUD
Product structure	Managed Fund
Product size	\$549.00m
Inception date	Apr 2008
Asset class	Australian Equities

Peer group Multi-Manager Rated peers 11

Product Characteristics

Sector

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	0.73
Performance fee costs	0.43
Net Transaction Costs	0.09
Buy/Sell Spread	0.20/0.20
Annual fees and costs	1.25

Source: FE fundinfo

Product Opinion

The Fund has maintained its 'Recommended' rating at its recent review. There is high regard and conviction for the experience and calibre of the broader investment team and Portfolio Manager, Peter Sumner. 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 Fund's overall fee load is considered to be high relative to peers.

Lonsec Rating Model

Rating key:	oove	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

Strengths

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

Weaknesses

- · Although the value proposition is strong, the Fund's overall fee load is relatively high in the peer group.
- Performance has lagged the Benchmark and peers over the short and intermediate term.
- 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.

Key Facts

Key Objectives

Investment objective	To provide capital growth over the long term by investing in a diversified portfolio of Australian shares, and to achieve a total return after fees in excess of the S&P/ASX 300 Accumulation Index over a rolling seven-year period.
Internal return objective	Outperform the S&P/ASX 300 Accumulation Index by 2.0% p.a. (before fees) over rolling five years periods.
Internal risk objective	Tracking Error of less than 3.0% p.a. over rolling five-year periods.
Non- financial objective	N/A

Asset Allocation (%)

Australian Equities	99.54
Cash	0.46
Total	100.00

Source: FE fundinfo

Rating History	
19-Apr-2023	Recommended
11-Apr-2022	Recommended
15-Apr-2021	Recommended

Product Distribution Profile

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

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

	Weight (%)
BHP Group Ltd	5.73
CSL Limited	3.59
National Australia Bank Limited	3.00
Transurban Group Ltd.	2.80
Macquarie Group, Ltd.	2.78
Telstra Group Limited	2.62
Commonwealth Bank of Australia	2.35
ANZ Group Holdings Limited	2.13
QBE Insurance Group Limited	2.07
James Hardie Industries PLC Chess Units of Foreign Securities	1.70
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)	-1.09	0.89	-2.67	-0.56	5.99	8.41	7.16	6.04
Standard deviation	10.18	11.69	13.27	13.95	12.45	13.09	15.43	16.39
Excess return (% p.a)	-3.61	-1.52	-2.60	-0.48	-2.69	-0.47	0.01	-1.13
Outperformance ratio (% p.a)	41.67	41.67	45.83	47.92	38.89	44.44	48.33	44.17
Worst drawdown (%)	-7.76	-7.61	-11.59	-11.41	-11.59	-11.41	-25.73	-28.23
Time to recovery (mths)	NR	-	13	-	13	-	8	-
Sharpe ratio	-0.47	-0.23	-0.37	-0.19	0.36	0.51	0.38	0.28
Information ratio	-1.10	-1.08	-0.77	-0.28	-0.87	-0.30	0.00	-0.66
Tracking error (% p.a)	3.29	1.51	3.37	1.93	3.09	2.02	3.44	2.06

Lonsec Peer Group: Australian Equities - Australian Large Cap - Multi-Manager

Product Benchmark: S&P/ASX 300 TR Index AUD
Cash Benchmark: Bloomberg AusBond Bank Bill Index AUD

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

AUM

Business

Facts	
% Staff Ownership	0-10%
Investment Manager	IOOF Investment Services Ltd
Ultimate Parent Company	Insignia Financial Ltd
Headquarters	Australia
Inception Date	01/01/1846



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)
Peter Sumner	Portfolio Management	No	2022	35/35	35
Daniel Farmer	CIO	No	2013	28/14	27
Stanley Yeo	Portfolio Management	No	2013	24/14	23

KDM Change*

No changes.

Profile

Size	8
Structure	Centralised
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	2	31
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?

Peter Sumner is the portfolio manager for the Fund and is ultimately accountable for underlying fund manager selection, portfolio construction, ongoing monitoring, and performance. Sumner was appointed as portfolio manager in September 2022 following the departure of Paul Crisci. Sumner is 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.

^{*} Last 3 years



Team (continued)



Lonsec Opinion

Skill

Sumner is a seasoned investor who has shown demonstrable skill throughout the investment cycle. Sumner is supported by the broader team and asset consultants, and 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 Equities & Strategy team is relatively moderately resourced and comprises eight individuals including Peter Sumner. 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 teambased 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 utilises a style-neutral approach that emphasises manager skill and quality within the portfolio. The Fund is biased towards mid-, small-, and micro-cap managers and boutique managers with low FUM with a view that active management in niche segments outperforms over the long term. The process is intuitive and employs an active 'Strategic Tilting' framework, which is expected to improve the risk/return outcome for investors.

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 (Combination of different Manager Styles)
Sector Exposure	Active
Available Universe	Managed Funds (Australian Equities Multi- Manager Products)

The fully diversified investment approach of combining highquality 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 riskadjusted 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 philosophy is predicated on academic research and 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.

That said, there is an emphasis on the small-cap tilt within the portfolio which is viewed as harbouring a premium over the longer term. The Manager has a distinct emphasis on allocating to high-quality managers when fees are low and alpha potential is typically at its highest.

Research Process

Idea generation	Investment Team, Asset Consultants, Economic Research, Third-Party Resourcing
Managers actively tracked	30
External consultant	Mercer and JANA
Annual manager meetings	80

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 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	No
Typical security numbers	400

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. The level of activeness in the portfolio is considered appropriate. The Fund has a considered allocation to micro-, small-, and mid-cap managers which may result in performance that differs substantially from peers and the benchmark over an investment cycle.

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

Although the FUM is considered large, there are not any concerns in terms of capacity given the wide opportunity set for Australian equity multi-manager strategies. That said, the Fund includes a distinct tilt towards micro, small and mid-cap managers which may result in more limited capacity compared to a more large-cap oriented strategy.

Investment Risk Management

Monitoring external to investment team	Yes
Frequency of monitoring	Daily
Primary risk management system	Barra, FactSet
Max illiquid	None
Security / issuer limit (min./max)	Not stated
Sector / segment limits (min./max)	Not stated
Cash Allocation (Typical, Max.)	3% (Typical), 10% (Maximum)

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 Manager closely monitors manager portfolios and weightings 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.



ESG •••

Manager Positioning

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

What is the Manager's ESG approach?

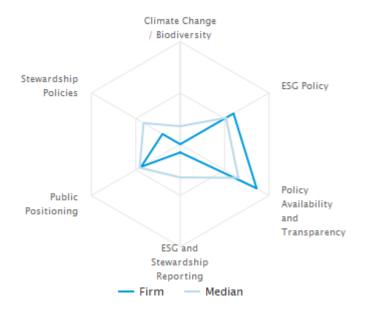
The Manager has indicated that their Responsible Investment style is "ESG Integration" and as such that they take Environmental, Social and Governance factors into consideration when assessing investment opportunities. With a primary ESG style of "Risk or Value" Managers will determine inclusion based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

ESG Snapshot



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

Product Details

Product size	\$549.00m
Fund 12-month net flows	Negative
Distribution model	Internal
Buy/sell spreads	0.20/0.20
Net transaction costs	0.09
Product type	Managed Fund
Use of derivatives	Permitted
Currency hedged	Unhedged
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 equity 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. However, micro-caps and small-cap securities tend to have lower liquidity during stressed markets. There have been no regulatory findings lodged over the previous 12 months.

Wind-up Risks

The Wind-Up risk is low given the current level of assets. Further, there is strong support from Insignia's extensive distribution network which mitigates the wind-up risk.

Annual Fees and Costs (% p.a.)	
Management fees & costs	0.73
Performance fee costs	0.43
Net Transaction Costs	0.09
Buy/Sell Spread	0.20/0.20
Annual fees and costs	1.25

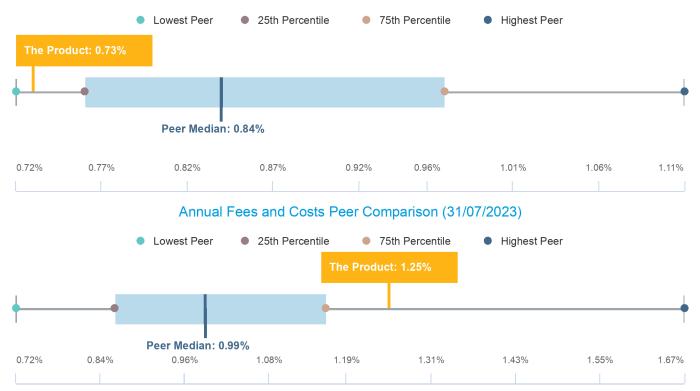
Performance Fees Applicable No

Fees Explained

Source: FE fundinfo

Note that the Manager does not charge a performance fee, but the performance fees are from the underlying managers held by the Fund.

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



Peer Universe: Australian Equities - Australian Large Cap - Multi-Manager

Lonsec Opinion

Annual Fees and Costs

The total fee load for the Fund is high relative to the Australian multi-manager, single-sector peer group.

Fairness

The strategy has historically been relatively active over the longer term compared to peers. The Fund's PDS objectives are in line with peers given the Fund targets outperformance on an after-fees basis. That said, the presence of the performance fee and the relatively modest internal objective above the fee load detracts from the fairness of the Fund.



Performance data is as at 31 October 2023

Performance



Performance Summary

PDS return objective	To provide capital growth over the long term by investing in a diversified portfolio of Australian shares, and to achieve a total return after fees in excess of the S&P/ASX 300 Accumulation Index over a rolling seven-year period.
Internal return objective	Outperform the S&P/ASX 300 Accumulation Index by 2.0% p.a. (before fees) over rolling five years periods.
Internal risk objective	Tracking Error of less than 3.0% p.a. over rolling five-year periods.
Product benchmark	S&P/ASX 300 TR Index AUD
Lonsec peer group	Multi-Manager

Alpha Generation

The Fund has outperformed its Benchmark and peer median over the longer term. The Fund has also been in line with its PDS performance objective. The Fund has exhibited underperformance compared to the peer median and the Benchmark over the short and intermediate term. The alpha generation is therefore mixed given the short-term performance weighing on the longer-term numbers.





Alpha Consistency

The Fund's consistency has been mixed compared to peers as it has lagged the Benchmark and the peer median in recent years. However, this is attributed to the small and mid-cap tilts held within the portfolio. Over the longer term, there is outperformance over the peer median and Benchmark whilst failing to achieve the internal investment objective of 2% p.a. Benchmark outperformance.







Performance data is as at 31 October 2023

Performance (continued)



Benchmark Relativity

The Fund has generated a higher tracking error relative to peers, with notably higher activeness levels over the longer term. The Fund's Information Ratio has been above the peer median over the longer term. However, the intermediate-term figures have been below the peer median. The reward for activeness has been mixed compared to peers and the Fund has not achieved its internal risk objective.





Return Volatility

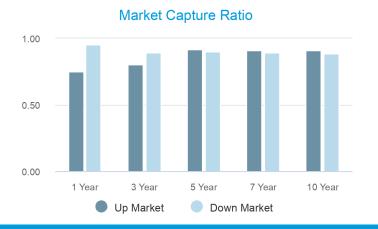
The Fund has displayed lower volatility over all time periods relative to the Benchmark and the peer median, having experienced notably lower levels of volatility post-2020. The Sharpe Ratio has been higher than the peer median over the longer term, whilst being lower over the short and intermediate term. The Fund has generated strong risk-adjusted returns over the long term.

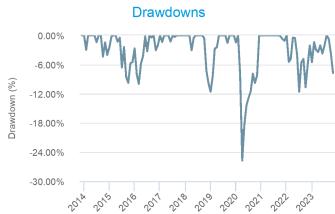




Product Defensiveness

The Fund has experienced larger drawdowns over the short-to-intermediate term whilst delivering smaller drawdowns over the longer term. The Fund has consistently outperformed the Benchmark in down markets, whilst delivering a down market capture ratio of less than one. The time to recovery has been longer over the short-to-intermediate term and shorter over the longer term.





Lonsec

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 Lonsec Research 9 June 2023

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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 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.

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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

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.

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 9 June 2023.