

Product Assessment

Report data as at 30 Apr 2019
Rating issued on 12 Jun 2019

Auscap Long Short Australian Equities Fund

VIEWPOINT

The Fund is a long/short, variable beta Australian equity fund managed by Sydney based Auscap Asset Management (Auscap). Zenith's conviction in the Fund is underpinned by the high calibre of the investment team and the attractiveness of the underlying investment philosophy and process, which we believe to be prudent and robust. Although we are disappointed with Auscap's inability to preserve capital in recent market conditions, we retain conviction in the Fund achieving its investment objectives over the long term.

Auscap was established in 2012 as a boutique Australian equities focused long/short investment manager. Auscap is independently owned by founders Tim Carleton and Matthew Parker. As at 31 May 2019, Auscap had approximately \$A 531 million in funds under management, all of which was in the Fund.

The investment team of four is led by Carleton and Parker, who collectively have over 35 years' industry experience. Prior to establishing the Fund, both Carleton and Parker worked at Goldman Sachs from 2008 to 2011 where they each managed an Australian equities long/short portfolio using proprietary funds. Zenith views the portfolio managers' prior working relationship as a positive for the Fund. In addition, Zenith believes Carleton and Parker are highly experienced and have a firm understanding of the Australian equities market.

Co-portfolio managers Carleton and Parker are jointly responsible for the Fund. The Fund is expected to be long biased over the long term and is constructed through a benchmark unaware and bottom-up approach, which strongly leverages the stock selection process. For a stock to be included in the Fund, a consensus is needed between Carleton and Parker. Zenith believes Auscap's stock selection process is intuitively sound, drawing on the bottom-up stock selection experience of the investment team.

Weightings for portfolio positions are determined based on Auscap's level of investment conviction and stock liquidity. Carleton and Parker will consider market dynamics to determine optimal entry and exit points. The portfolio managers are responsible for dealing, which Zenith believes allows for better understanding of market forces and sentiment.

Unlike its long/short peers who dynamically adjust market exposures through derivatives, the Fund's aggregate gross long and short exposures are a function of the investment opportunity set. In addition, the Fund can hold cash (up to 100%) in the absence of compelling absolute return investment opportunities or for risk management purposes, which Zenith believes to be consistent with Auscap's capital preservation focus. Zenith is confident in Auscap's portfolio construction approach and believes the portfolio managers are well experienced to utilise the full range of the Fund's flexible investment mandate to add value for investors.

Zenith notes that whilst the Fund's performance fee structure is in line with standard practice, the hurdle provided by the RBA Cash Rate is less than what it has been historically. For an absolute return strategy that charges a performance fee, Zenith would prefer to see in place a flat and fixed performance hurdle (above the RBA Cash Rate); a structure we consider to be best practice.

FUND FACTS

- Typically holds between 25 and 45 stocks (20 to 30 long positions and 5 to 15 short positions)
- Maximum gross market exposure of 400%
- Although expected to be long biased, net exposure can range between -150% and 150%
- Portfolio turnover is expected to be high at approximately 100% p.a. to 200% p.a.
- Monthly liquid with a one month redemption notice period (a daily liquid unit class is available, APIR: ASX6124AU)

APIR Code

ASX0001AU

Asset / Sub-Asset Class

Australian Shares
Long Short

Investment Style

Variable Beta

Investment Objective

To achieve absolute returns of 10% p.a. to 15% p.a. (before fees) over the long term, with an overarching philosophy of capital preservation.

Zenith Assigned Benchmark

S&P/ASX 300 (Accum)

Net Returns (% p.a.)

	5 yrs	3 yrs	1 yr
Fund	10.22	3.15	-7.35
Benchmark	7.55	11.07	10.31
Median	7.36	7.91	5.45

Income (% p.a.)

	Income	Total
FY to 30 Jun 2018	1.74	12.72
FY to 30 Jun 2017	5.29	7.98
FY to 30 Jun 2016	16.38	20.13

Fees (% p.a., Incl. GST)

Management Cost: 1.54%
Performance Fee: 15.375% over RBA cash rate

ABSOLUTE RISK (SECTOR)



RELATIVE RISK (FUND WITHIN SECTOR)



INCOME DISTRIBUTIONS PER



INVESTMENT TIMEFRAME



APPLICATIONS OF INVESTMENT

SECTOR CHARACTERISTICS

The Zenith “Australian Shares – Long Short” sector consists of long/short funds investing across the market cap spectrum of the Australian equity market. These funds can short sell equities and/or SPI futures to capture excess return opportunities and manage risk. Over the long term, Zenith expects quality long/short funds to outperform the S&P/ASX 300 Accumulation Index given a manager’s ability to generate excess returns from short selling.

Each long/short manager uses vastly different investment processes. Some managers are fundamentally driven, others use quantitative tools, and others have trading style biases. Funds in this sector employ active extension or variable beta investment styles. Active extension funds can be used in place of a traditional long-only fund where the investor wishes to increase the “activeness” of their fund allocations in equities. That is, the fund can build a higher conviction portfolio by shorting stocks that it thinks will underperform and use the proceeds to invest long in stocks that may outperform. Variable beta funds can be used by investors to reduce the market risk of investing with a long-only fund that must be close to fully invested. Variable beta funds can decrease their market exposures to protect against market falls (by increasing shorts or cash holdings). In general, investing in quality variable beta funds should provide investors “smoother” returns than simply investing in the index.

Zenith benchmarks all funds in this sector against the S&P/ASX 300 Accumulation Index. However, many managers in this category benchmark their funds against the S&P/ASX 200 Accumulation Index. Both indices are market-capitalisation weighted, resulting in companies with the largest market capitalisations receiving the heaviest weightings within the index. Over the longer term, Zenith believes there will be minimal difference between the return profiles of these indices.

The Australian share market, as represented by the S&P/ASX 300 Index, is highly concentrated and narrow. Technically, a company is considered large cap if it falls within the S&P/ASX 50 Index, with companies falling between the S&P/ASX 50 and S&P/ASX 100 considered mid cap. All stocks outside of the S&P/ASX 100 Index are considered small capitalisation stocks.

As at 31 May 2019, the Financials and Resources sectors combined represented a significant portion of the S&P/ASX 300 Accumulation Index, with the Financials sector accounting for approximately 31% of the Index and the Materials sector approximately 19%. The split between Industrials and Resources stocks was approximately 80%/20%. The top 10 stocks represented approximately 43% of the weighting of the Index and the top 20 stocks represented over 57% of the Index.

PORTFOLIO APPLICATIONS

Investors should be aware that the Fund has monthly liquidity, whilst Auscap also applies a minimum of one month notice period for redemptions. Zenith notes that a daily liquid unit class of the Fund is available (APIR: ASX6124AU). However, investors can only access this investment option via select investment platforms.

In general, compared to most other asset classes, equities offer investors the opportunity for higher capital growth over the longer term with some income. However, this higher growth is also often associated with higher volatility. Therefore, it is recommended that investors adopt a longer time frame when investing in equities.

Investors should also be cognisant of the fact that the Australian equity market is relatively concentrated, with the Materials and Financials sectors dominating the market. The market also only represents approximately 1% of global equity markets (in terms of market capitalisation). Therefore, to mitigate this concentration risk it is highly recommended that investors diversify their investments across asset classes, both domestically and globally.

Unlike a traditional long-only Australian equities fund, the Fund utilises a concentrated long/short investment strategy, which provides Auscap with greater flexibility to meet its investment objective and add value for investors over the long term. The short selling capability enables the Fund to profit from companies that are expected to fall in price or hedge against declines in the market and therefore, potentially offer a different return profile to most long-only Australian equity funds. As a result, the Fund will be exposed to higher levels of stock specific risks and as such, performance that can deviate from the Fund’s historical averages or mainstream equity benchmarks.

Zenith notes that Auscap has demonstrated extensive use of the flexibility within the mandate, with the net equity exposure of the Fund ranging between 45% and 135% since inception. Auscap has proven to be more dynamic than peers in adjusting exposures to a greater extent over shorter discrete periods, subject to the availability of investment opportunities or for risk management considerations.

Zenith encourages investors to adopt a medium to longer-term investment timeframe of more than seven years when investing in this Fund. Investors should be aware that the Fund targets its return objective with leverage. The gross exposure (total long plus total short exposure) of the Fund has varied between 60% and 250% since inception.

Zenith believes this is an important measure for investors to understand as it is indicative of the actual leverage in a portfolio, which may amplify losses should Auscap fail to deliver added value from both its long and short components (i.e. gross leverage of greater than 100% magnifies the level of success and failure).

While the Fund can be held as a standalone exposure to the Australian equities sector, Zenith believes the Fund should be blended with other Australian equities funds. The Fund can be blended with other style-neutral, value and/or growth orientated Australian equities products to achieve a more diversified exposure to the asset class and has the potential to enhance the overall risk/return profile of a portfolio.

The Fund is expected to exhibit a high level of portfolio turnover (100% p.a. to 200% p.a.). Given this expected level of turnover, the majority of the Fund’s returns are expected to be delivered via the realisation of capital gains in income distributions, rather than through capital appreciation in the unit price. Zenith notes that the Fund has generated a strong and consistent level of capital growth since inception, the majority

of which would be subject to the capital gains tax discount. As such, holding all else equal, this could be beneficial for investors on higher marginal tax rates, although the Fund may be more appealing to investors who are nil/low tax payers or high marginal tax rate payers who invest through tax-effective vehicles such as a superannuation fund.

RISKS OF THE INVESTMENT

SECTOR RISKS

Funds within the "Australian Long Short" sector are exposed to the following broad risks:

MARKET & ECONOMIC RISK: A risk to the performance of funds in the sector is a sustained downturn across the Australian share market. In addition, changes in economic, social, technological or political conditions, as well as market sentiment could also lead to negative fund performance. This risk can be significantly reduced by investors adhering to the Fund's prescribed investment timeframe.

SPECIFIC SECURITY RISK: This is the risk associated with an individual security. The price of shares in a company may be affected by unexpected changes in that company's operations such as changes in management or the loss of a significant customer.

LIQUIDITY RISK: This is the risk that a security or asset cannot be traded quickly enough, due to insufficient trading volumes in the market. When trading volumes are low, buyers/sellers can significantly impact the price of a security when attempting to quickly enter/exit a material position.

STYLE BIAS RISK: Australian equity managers will either employ a Growth, Value or Neutral (combination of Value & Growth) styled approach to investing. Each style is conducive to certain market conditions i.e. Growth should outperform Value in an upward trending market and vice versa in a downward trending market. As with Market Risk, investors should adhere to the fund's investment timeframe to avoid short-term market movements and style impact.

CAPACITY RISK: High levels of funds under management (FUM) can present additional challenges to an Australian equity manager, as high FUM has the potential to hamper the manager's ability to trade efficiently and/or be forced to disclose substantial shareholdings to the market (most common in smaller companies).

SHORT RISK: Australian long/short funds have the ability to borrow securities and sell them on market (i.e. shorting). Given that such securities will need to be returned to the lender eventually, the short seller may be required to re-purchase the securities on market at a higher price, thereby incurring a loss. Such losses can potentially be unlimited given that there is no theoretical limit on how much the price of a security can rise.

REGULATORY RISK: The ASIC Regulatory Guide 97 'Disclosing Fees and Costs in PDSs and Periodic Statements' came into effect on 1 October 2017 and seeks to establish a common framework for disclosing fees with respect to registered managed investment schemes issued to retail investors.

In January 2019, ASIC released a Consultative Paper (CP), seeking feedback with respect to proposed changes to the

existing fee and cost disclosure regime. The consultation period ends in April 2019, following which, ASIC will collate feedback and structure final recommendations, notifying of an intended implementation period.

In its current form, RG97 is not expected to impact the actual costs (or net returns) on existing investments. Rather, the guide is focused on providing increased transparency with respect to the costs of management. Given this, it is feasible that under RG97, investors become more sensitive to the costs charged and seek lower cost alternatives, potentially leading to fund outflows.

FUND RISKS

Zenith has identified the following key risks of the Fund. Although Zenith believes the risks noted are all significant, we have listed them in order of importance. In addition, we have not intended to highlight all possible risks.

KEY PERSON RISK: Auscap is subject to a relatively high level of key person risk. Zenith views Tim Carleton and Matthew Parker as being critical to the management of the Fund. A departure of either would trigger an immediate review of our rating on the Fund, however, Zenith acknowledges the material equity ownership of Carleton and Parker in the business and we believe that this mitigates the risk of a departure, at least in the medium-term.

CAPACITY RISK: Excessive levels of funds under management (FUM) can inhibit a manager's ability to trade portfolio positions effectively and may therefore limit outperformance potential. Zenith does not consider capacity to be a current issue given strategy FUM stands at approximately \$A 531 million as at 31 May 2019, however this is an area that Zenith will continue to monitor closely.

CONCENTRATION RISK: The Fund holds a concentrated portfolio of stocks (typically 25 to 45 including shorts). Investors should be aware that this may result in higher levels of stock specific risks and as such, performance can deviate from the Fund's historical averages or mainstream equity benchmarks.

LEVERAGE RISK: The Fund has the ability to short sell stocks and use the proceeds to increase its long exposure to stocks. This increases an investor's exposure to Auscap's stock specific decisions and can magnify returns and losses. The maximum gross exposure, namely the sum of the Fund's long and short exposures, is limited to 400% of the value of the Fund's net assets.

DERIVATIVE RISK: The Fund can use derivatives such as options and futures and these investment securities can be volatile, speculative, illiquid and leveraged. The use of derivatives is limited to hedging purposes with index/stock puts used to hedge physical stock positions, whilst futures are used to adjust the market exposure of the portfolio. However, the Fund can only use exchange traded derivatives and cannot use them to leverage up the Fund.

ACCESSIBILITY RISK: The Fund offers investors monthly liquidity. Zenith notes that this is inconsistent with peers and would prefer more favourable liquidity terms given that a large portion of the investments in the Fund and their historical return generation are predominately from trading in a relatively liquid segment of the Australian equity market (S&P/ASX 200). In addition, Auscap also applies a one month minimum notice

period for redemptions.

Zenith notes that a daily liquid unit class of the Fund is available (APIR: ASX6124AU). However, investors can only access this investment option via select investment platforms.

COUNTERPARTY RISK: The Fund's custody and counterparty contracts are subject to potential default risk. In particular, the Fund is exposed to counterparty risk with its Prime Broker, Citigroup Global Markets Limited (CGML). Assets of the Fund are required to be transferred to CGML when borrowing stock for short selling. Assets up to the required collateral amount are held on CGML's balance sheet and are not segregated from other CGML assets.

Should CGML become insolvent, there is a risk that the assets posted by the Fund may not be recoverable.

QUALITATIVE DUE DILIGENCE

ORGANISATION

Based in Sydney, Auscap Asset Management (Auscap) was established in 2012 as a boutique Australian equities focused long/short investment manager. Auscap is independently owned by its founders, Tim Carleton and Matthew Parker.

As at 31 May 2019, Auscap had approximately \$A 531 million in funds under management, all of which was in the Fund.

INVESTMENT PERSONNEL

Name	Title	Tenure
Tim Carleton	Portfolio Manager	6 Yr(s)
Matthew Parker	Portfolio Manager	6 Yr(s)

The investment team of four is led by Tim Carleton and Matthew Parker, who collectively have over 35 years industry experience. Prior to establishing the Fund, Carleton and Parker worked together at Goldman Sachs from 2008 to 2011 where they each managed an Australian equities long/short portfolio using proprietary funds. Zenith views the portfolio managers' prior working relationship as a positive for the Fund.

Zenith believes Carleton and Parker have complementary skill sets and focus areas. For example, Carleton typically begins his company research through analysing financial statements, while Parker will start with trying to understand the consensus views on the stock.

Having founded the strategy together in 2012, Carleton and Parker have maintained the initial co-portfolio manager structure since inception. Carleton and Parker share all responsibilities and do not allocate workload along sector or industry lines. Furthermore, there is no performance attribution between the two, ensuring ongoing and constructive management of the Fund.

Over the course of 2018, Auscap added Gavin Rogers and William Mumford to the investment team. With over 25 years' investment experience, Rogers is based in Melbourne and predominantly acts as a sounding board for Carleton and Parker. Zenith notes that Rogers previously worked with Carleton and Parker at Goldman Sachs. Mumford provides analytical support for Carleton and Parker, allowing them to focus on the key investment issues. Zenith views the

expansion of the team positively.

Carleton and Parker are co-owners of the business. As such, Zenith believes the ownership structure of Auscap aligns the interests of the investment team to the performance of the Fund and the overall success of the business.

Overall, Zenith believes Carleton and Parker are highly experienced and have a firm understanding of the Australian equities market.

INVESTMENT OBJECTIVE, PHILOSOPHY AND PROCESS

The Fund aims to achieve absolute returns of 10% p.a. to 15% p.a. (before fees) over the long term. Auscap maintains an equal focus on meeting its performance and capital preservation objectives. Zenith notes that Auscap is conservative and measured in its investment approach, which we believe is conducive for the management of an absolute return/variable beta strategy.

Auscap believes that markets are efficient in the long term, however due to behavioural biases and the time required for information to be disseminated and fully analysed, inefficiencies can occur in the shorter term. These inefficiencies result in the deviation of stock valuations from their intrinsic value. Auscap attempts to exploit these inefficiencies through the use of a concentrated, long/short strategy that is driven primarily by fundamental analysis. Auscap adopts a value style approach to investing with a bias towards stocks exhibiting quality attributes.

SECURITY SELECTION

The Fund's investable universe is all Australian listed equities, however Auscap will tend to focus predominantly on stocks within the S&P/ASX 200 Index.

The stock selection process begins with the identification of attractively priced potential investment opportunities. Auscap screens the universe on the following metrics:

- Forecast earnings yield
- Anticipated earnings growth
- Price to earnings ratio (P/E)
- Price to cash flow ratio (P/CF)
- Enterprise value to earnings before interest and tax ratio (EV/EBIT)
- Dividend yield
- Price to net tangible assets (P/NTA)

In addition to the quantitative screen, Auscap also considers opportunities from a variety of sources such as:

- Industry data
- Company meetings and site visits
- Discussions with management
- Discussions with sector & stock analysts
- Review of external research reports and valuation work

Once an investment opportunity is identified, it is subject to both quantitative and qualitative analysis. The portfolio managers rely on internal fundamental research, which includes financial analysis and a company visitation program.

Quantitative analysis includes an assessment of the following metrics:

- Historic cash flow generation and conversion
- Current strength of balance sheet (Debt/EBIT, Interest coverage ratio and Debt to market capitalisation)
- Return on invested capital (ROIC)
- Return on assets (ROA)
- Return on equity (ROE)
- Historic, near-term and sustainable revenue and earnings growth
- Historical profitability
- Sector and stock revenue growth drivers
- Volatility of revenues, earnings and cash flow

Qualitative analysis involves the assessment of the following factors:

- Quality and strength of management
- Industry feedback and perception
- Simplicity of the business model
- The nature of the goods and services offered
- Investigative and anecdotal evidence
- Testing of the investment thesis against similar and contrary opinions

In addition, Auscap also has access to numerous brokers for external investment research reports, broker research reports and corporate access.

More specifically for short selling opportunities, Auscap seeks the following characteristics:

- Poor cash flow
- A weak balance sheet
- Declining earnings and/or cash flows
- Complex business models
- Questionable accounting practices
- Poor cash flow conversion (as a percentage of reported profits)
- Undisciplined, inexperienced or poor management
- A market capitalisation that significantly exceeds a reasonable estimate of fair value
- Market sentiment, investor psychology and technical indicators that suggest downside price risk

Overall, Zenith believes Auscap's stock selection process is intuitively sound, drawing on the bottom-up stock selection experience of the investment team.

PORTFOLIO CONSTRUCTION

Co-portfolio managers Carleton and Parker are jointly responsible for portfolio construction. The Fund is expected to be long biased over the long term.

The Fund is expected to be long biased over the long term and is constructed through a benchmark unaware and bottom-up approach, which strongly leverages the stock selection process. For a stock to be included in the Fund, a consensus is needed between Carleton and Parker.

Weightings for portfolio positions are determined based on the level of conviction in the idea and the liquidity of the stock. The Fund is relatively concentrated and will typically hold between 25 and 45 stocks, both long and short combined. More specifically, there will generally be 20 to 30 long positions and

5 to 15 short positions.

Carleton and Parker will consider investor psychology and market sentiment to determine optimal entry and exit points. Individual positions will be exited when one of the following occurs:

- The investment thesis becomes invalidated by new data, changing circumstances and/or a change in Auscap's view
- The position trades above (for long positions) or below (for short positions) Auscap's view of intrinsic value
- Poor technical indicators suggest a continued deterioration in the share price is probable, without an appropriate justification for continued investment

The portfolio managers are responsible for dealing, which Zenith believes allows for better understanding of market forces and sentiment. Portfolio turnover is expected to be high at approximately 100% p.a. to 200% p.a.

Unlike its long/short peers who dynamically adjust market exposures through derivatives, the Fund's aggregate gross long and short exposures are a function of the investment opportunity set. In addition, the Fund can hold cash (up to 100%) in the absence of compelling absolute return investment opportunities or for risk management purposes, which Zenith believes to be consistent with Auscap's capital preservation focus.

Zenith is confident in Auscap's portfolio construction approach and believes the portfolio managers are well experienced to utilise the full range of the Fund's flexible investment mandate to add value for investors.

RISK MANAGEMENT

Portfolio Constraints	Description
Security Numbers - Long	20 to 30 (typically)
Security Number - Short	5 to 15 (typically)
Gross Exposure - Total (%)	max: 400% (hard)
Gross Exposure - Long (%)	max: 200% (hard)
Gross Exposure - Short (%)	max: 200% (hard)
Net Exposure (%)	-150% to 150% (hard)
Cash (%)	max: 100% (hard)
ESG Constraints - Excluded Sectors	N/A

The Fund is managed within the above listed risk management constraints. Whilst broad, Zenith believes these risk limits provide the Fund with sufficient flexibility to achieve its investment objective, whilst maintaining a disciplined approach to investing.

At the individual security level, Zenith believes that risk management is well incorporated in the detailed fundamental research process undertaken by Auscap.

The gross and net equity exposures of the portfolio are dependent on the investment opportunity set and subject to the portfolio limits. Zenith believes the gross and net equity exposure constraints are appropriate given the strategy and objective.

Zenith notes that whilst there are no industry, sector or market capitalisation exposure limits, which can potentially lead to high levels of concentration in certain sectors, this is consistent with the Fund's absolute return focus.

Given the asymmetric risk profile of short sold positions, Auscap manages these positions more actively than their long counterparts. Short sold positions will typically be smaller than corresponding long positions. Greater consideration is given to liquidity and high levels of short interest, with short positions typically in companies with market capitalisations of greater than \$A 1 billion. Short positions will typically constitute 20% to 40% of the Fund.

Zenith is comfortable with Auscap's risk management process and in particular notes the conservative and disciplined approach undertaken by the portfolio managers. However, investors should be aware there is significant reliance on the judgement and skill of Carleton and Parker.

Environmental, Social & Governance (ESG)

While the portfolio has no specific exclusions as outlined in the table above, Auscap incorporates ESG considerations into its research effort. The identification of ESG issues can be reflected in a company's quality assessment and/or valuation, which if deemed to be significant, can preclude the company from potential investment. Zenith believes that this qualitative analysis of a company's operations is crucial on a forward basis, given that a company's performance with regards to ESG considerations is increasingly being reflected in the company's share price. Overall, Zenith is comfortable with Auscap's approach to ESG.

ADMINISTRATION AND OPERATIONS

The Fund has no redemption fees or gates.

The Fund provides monthly liquidity with a one month redemption notice period. Zenith notes that a daily liquid unit class of the Fund is available (APIR: ASX6124AU). However, investors can only access this investment option via platforms.

Operations

The Auscap Compliance & Risk Management Policies set out Auscap's approach to risk management and capture Auscap's legal, regulatory and commercial obligations.

In conjunction with launching a retail version of the Fund in 2016, the Compliance Committee now comprises a majority of independent members whereas previously it was a subcommittee of the Auscap Board. This committee is ultimately responsible for the ongoing monitoring of compliance, audit, and risk management functions.

Service Providers

The Fund has appointed the following independent service providers:

Prime Broker

Citigroup Global Markets Limited

Administrator

Link Fund Solutions Pty Ltd

Custodian

Citigroup Global Markets Limited

Auditors

Ernst & Young

Legal

Norton Rose Fulbright

Pricing

The Fund's holdings are liquid Australian stocks that trade on the ASX. The portfolio is linked to live prices and runs live each trading day. The Fund Net Asset Value (NAV) is calculated by the administrator.

Transparency

Auscap has provided Zenith with the documentation that we have requested and we are comfortable with the level of transparency that Auscap has provided.

Disaster recovery

Auscap has a detailed business continuity and disaster recovery plan. Auscap has a disaster recovery office located away from the city with separate computers and internet access. Files are stored on a network drive located in a secure temperature controlled room onsite. The files are backed up daily to the Cloud (which is secure and accessible remotely) and weekly to an external hard drive stored offsite. Key staff reconvene at the external disaster recovery office, download the company files and resume operations remotely.

Personal trading

Personal dealing is permitted but before trading the trader must disclose all the details of the trade to the Executive Directors. All employees must sign a Securities Trading Declaration on commencement at Auscap.

Compliance

Auscap maintains a detailed Operations & Compliance Manual in addition to a Compliance Plan that has been lodged with ASIC.

In terms of monitoring regulatory changes or other compliance developments Auscap employs an in-house legal and compliance capability, whilst they also utilise the services of external legal and compliance services.

The Principals of Auscap do not have any other active business interests. There are no outstanding legal, criminal, civil or regulatory proceedings against Auscap or the investment principals.

Personal dealing is permitted but before trading the trader must disclose all the details of the trade to the Executive Directors. All employees must sign a Securities Trading Declaration on commencement at Auscap.

INVESTMENT FEES

The Sector average management cost (in the table below) is based on the average management cost of all flagship Australian Shares - Long Short funds surveyed by Zenith.

The Fund charges a management cost of 1.5375% p.a. and a performance fee of 15.375%. The performance fee is charged against the net excess returns over the performance hurdle (RBA Cash Rate) and is subject to all prior underperformance being recouped. It is calculated and accrued monthly and paid semi-annually.

Zenith notes that whilst the performance fee structure is in line with standard practice, the hurdle provided by the RBA Cash Rate is less than what it has been historically. For an absolute return strategy that charges a performance fee, Zenith would prefer to see in place a flat and fixed performance hurdle (above the RBA Cash Rate); a structure we consider to be best practice.

Overall, Zenith believes the Fund's fee structure to be expensive, relative to peers, given its stated objectives. In addition, we believe that investors have not been sufficiently compensated by way of risk adjusted performance given the fees paid over the past three years (ending 30 June 2018).

There is also a buy/sell spread of 0.2% charged on Fund entry and exit, which is in place to protect existing investors from applications and redemptions, with any excess proceeds retained in the Fund.

(The fees mentioned above are reflective of the flagship version only, fees may differ when the product is accessed through an alternate investment vehicle such as a platform.)

Fees Type	Fund	Sector Average (Wholesale Funds)
Management Cost	1.54% p.a.	1.13% p.a.
	Description	
Performance Fee	15.375% over RBA cash rate	
	Buy Spread	Sell Spread
Buy / Sell Spread	0.20%	0.20%

PERFORMANCE ANALYSIS

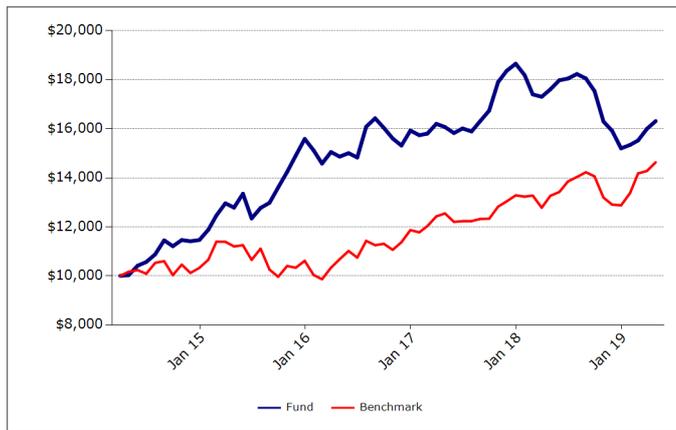
Report data: 30 Apr 2019, product inception: Dec 2012

Monthly Performance History (% , net of fees)

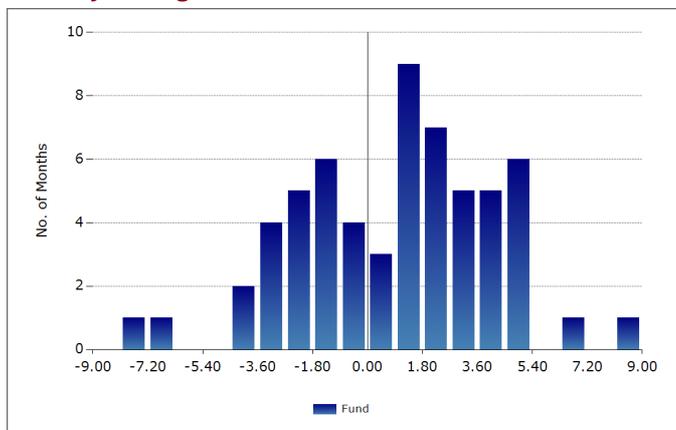
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	FUND YTD	BENCHMARK YTD
2019	0.92	1.19	3.08	1.96									7.32	13.64
2018	-2.50	-4.31	-0.56	1.75	2.11	0.39	1.02	-0.99	-2.85	-7.09	-2.33	-4.49	-18.51	-3.07
2017	-1.20	0.42	2.52	-0.81	-1.52	1.18	-0.77	2.75	2.53	6.96	2.58	1.56	17.11	11.95
2016	-3.01	-3.54	3.22	-1.24	0.96	-1.19	8.48	2.13	-2.37	-2.72	-1.83	4.00	2.20	11.80
2015	3.65	4.90	3.98	-1.36	4.43	-7.55	3.46	1.64	4.82	4.65	4.69	4.56	35.96	2.79

Benchmark: S&P/ASX 300 (Accum)

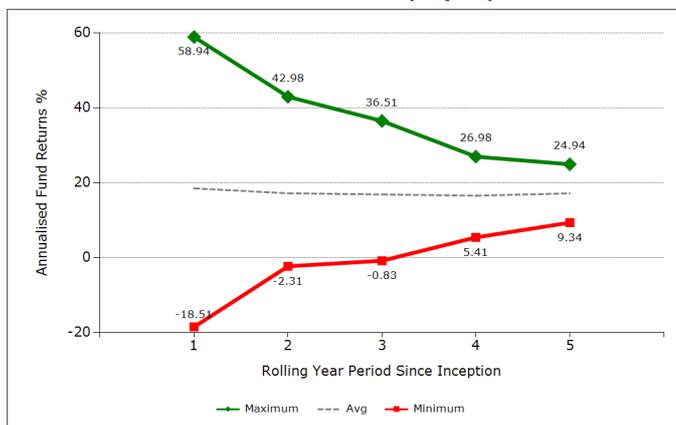
Growth of \$10,000



Monthly Histogram



Minimum and Maximum Returns (% p.a.)



ABSOLUTE PERFORMANCE ANALYSIS

Return	Incpt.	5 yr	3 yr	1 yr
Fund (% p.a.)	16.73	10.22	3.15	-7.35
Benchmark (% p.a.)	10.02	7.55	11.07	10.31
Median (% p.a.)	10.60	7.36	7.91	5.45
Ranking within Sector	Incpt.	5 yr	3 yr	1 yr
Fund Ranking	2 / 15	3 / 17	18 / 21	22 / 24
Quartile	1st	1st	4th	4th
Standard Deviation	Incpt.	5 yr	3 yr	1 yr
Fund (% p.a.)	11.56	11.09	10.43	10.10
Benchmark (% p.a.)	11.09	11.06	9.19	10.40
Median (% p.a.)	11.61	11.09	9.58	10.89
Downside Deviation	Incpt.	5 yr	3 yr	1 yr
Fund (% p.a.)	5.41	5.76	5.59	7.66
Benchmark (% p.a.)	5.94	6.23	4.62	6.02
Median (% p.a.)	6.53	6.21	4.94	6.60
Risk/Return	Incpt.	5 yr	3 yr	1 yr
Sharpe Ratio - Fund	1.25	0.73	0.12	-0.93
Sortino Ratio - Fund	2.67	1.41	0.23	-1.22

All commentary is as at 30 April 2019.

The Fund aims to achieve absolute returns of 10% p.a. to 15% p.a. (before fees) over the long term. Auscap maintains an equal focus on meeting its performance objectives and capital preservation.

The Fund has achieved its performance objective since inception.

The Fund has achieved its returns with a level of volatility, as measured by Standard Deviation, that is marginally higher than that of the S&P/ASX 300 Accumulation Index since inception.

On a risk-adjusted basis, the Fund has also achieved strong Sharpe and Sortino Ratios since inception, thus investors have been generally rewarded for the risk inherent in the Fund.

RELATIVE PERFORMANCE ANALYSIS

Alpha Statistics	Incpt.	5 yr	3 yr	1 yr
Excess Return (% p.a.)	6.71	2.67	-7.92	-17.66
% Monthly Excess (All Mkts)	50.65	45.00	33.33	16.67
% Monthly Excess (Up Mkts)	42.00	36.84	32.00	25.00
% Monthly Excess (Down Mkts)	66.67	59.09	36.36	0.00
Beta Statistics	Incpt.	5 yr	3 yr	1 yr
Beta	0.56	0.58	0.78	0.75
R-Squared	0.29	0.33	0.47	0.59
Tracking Error (% p.a.)	10.88	10.17	7.86	6.96
Correlation	0.54	0.58	0.69	0.77
Risk/Return	Incpt.	5 yr	3 yr	1 yr
Information Ratio	0.62	0.26	-1.01	-2.54

All commentary is as at 30 April 2019.

Zenith seeks to identify funds that can outperform their index in greater than 50% of months in all market conditions, as we believe this represents a persistence of manager skill. The Fund has achieved this outcome since inception. The Fund has tended to produce greater outperformance consistency in declining markets over all assessed periods, which Zenith believes demonstrates Auscap's focus on capital preservation. Disappointingly, this has not been the case in recent market conditions.

The Fund has produced very strong excess returns relative to the benchmark and the cash rate since inception.

Investors should be aware that the Fund is generally expected to lag the Index during periods of strong market performance. However, this has not always been the case over the life of the Fund.

The Fund's Tracking Error has remained high, which is consistent with the Fund's absolute return and benchmark unaware mandate.

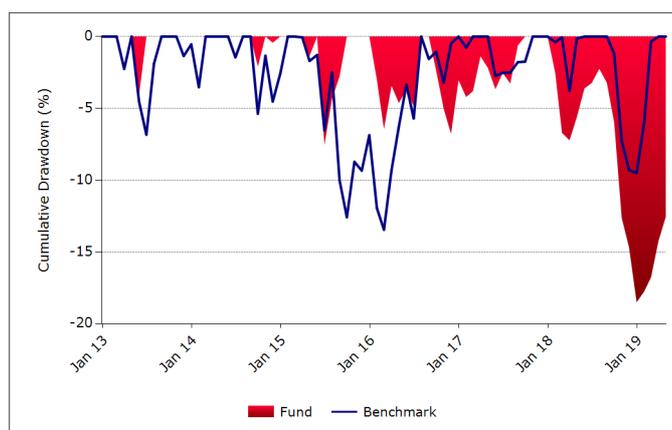
DRAWDOWN ANALYSIS

Drawdown analysis assesses the relative riskiness of a Fund versus the benchmark, in reference to capital preservation. The maximum Drawdown is recorded as the percentage decline in the value of a portfolio from peak to trough (before a new peak is achieved). All Drawdown analysis is calculated commencing from the inception date of the Fund in question, and Drawdown analysis for the Fund and benchmark(s) are calculated independently. That is, the largest drawdown for the Fund and benchmark(s) will not always refer to the same time period.

Drawdown Analysis	Fund	Benchmark
Max Drawdown (%)	-18.51	-13.46
Months in Max Drawdown	12	12

Drawdown Analysis	Fund	Benchmark
Months to Recover	-	5

Worst Drawdowns	Fund	Benchmark
1	-18.51	-13.46
2	-7.55	-9.51
3	-6.77	-6.83
4	-6.44	-5.37
5	-4.05	-3.78



All commentary is as at 30 April 2019.

Since inception, the Fund has demonstrated an ability to preserve capital during periods of market stress. Zenith expects the Fund's drawdowns to typically be more muted relative to the Australian sharemarket given its prudent investment process. However, we are disappointed with Auscap's inability to preserve capital in recent market conditions.

INCOME/GROWTH ANALYSIS

Income / Growth Returns	Income	Growth	Total
FY to 30 Jun 2018	1.74%	10.98%	12.72%
FY to 30 Jun 2017	5.29%	2.69%	7.98%
FY to 30 Jun 2016	16.38%	3.75%	20.13%
FY to 30 Jun 2015	3.14%	13.67%	16.81%
FY to 30 Jun 2014	34.25%	11.76%	46.01%
FY to 30 Jun 2013	6.83%	12.89%	19.72%

The Fund does not target specific income levels.

Where applicable, distributions are paid annually.

The Fund is expected to exhibit a high level of portfolio turnover (100% p.a. to 200% p.a.). Given this expected level of turnover, the majority of the Fund's returns are expected to be delivered via the realisation of capital gains in income distributions, rather than through capital appreciation in the unit price. Zenith notes that the Fund has generated a strong and

consistent level of capital growth since inception, the majority of which would be subject to the capital gains tax discount. As such, holding all else equal, this could be beneficial for investors on higher marginal tax rates, although the Fund may be more appealing to investors who are nil/low tax payers or high marginal tax rate payers who invest through tax-effective vehicles such as a superannuation fund.

REPORT CERTIFICATION

Date of issue: 12 Jun 2019

Role	Analyst	Title
Author	Quan Nguyen	Head of Equities
Sector Lead	Jacob Smart	Investment Analyst
Authoriser	Bronwen Moncrieff	Head of Research

RATING HISTORY

As At	Rating
12 Jun 2019	Recommended
14 Jun 2018	Recommended
31 May 2017	Recommended
21 Jun 2016	Recommended
25 Jun 2015	Not Rated - Screened Out
2 Jul 2014	Not Rated - Screened Out

Last 5 years only displayed. Longer histories available on request.

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