



Product Review

Bendigo Conservative Index

ISSUE DATE 23-03-2021

About this Review

ASSET CLASS REVIEWED	MULTI-ASSET
SECTOR REVIEWED	21-40% GROWTH ASSETS
SUB SECTOR REVIEWED	LOW-COST DIVERSIFIED
TOTAL FUNDS RATED	10

About this Fund

ASIC RG240 CLASSIFIED	NO
FUND REVIEWED	BENDIGO CONSERVATIVE INDEX
APIR CODE	STL0032AU
PDS OBJECTIVE	TO DELIVER INVESTMENT RETURNS AFTER FEES IN EXCESS OF 2% ABOVE INFLATION OVER A FULL MARKET CYCLE (TYPICALLY SEVEN TO 10 YEARS).
INTERNAL OBJECTIVE	TO EXCEED THE PERFORMANCE OF THE FUND'S SAA (BEFORE FEES) AND MORNINGSTAR - MULTI-SECTOR MODERATE FUND PEER MEDIAN (AFTER FEES).
STATED RISK OBJECTIVE	TRACKING ERROR VERSUS SAA BELOW 1.5%.
DISTRIBUTION FREQUENCY	SEMI-ANNUAL
FUND SIZE	\$463M (FEB 2021)
FUND INCEPTION	30-09-2011
MANAGEMENT COSTS	0.41% P.A. (INCLUDES INDIRECT COSTS.)
RESPONSIBLE ENTITY	SANDHURST TRUSTEES LIMITED

About the Fund Manager

FUND MANAGER	SANDHURST TRUSTEES LIMITED
OWNERSHIP	100% OWNED BY BENDIGO AND ADELAIDE BANK LIMITED
ASSETS MANAGED IN THIS SECTOR	\$4.9B (FEB 2021)
YEARS MANAGING THIS ASSET CLASS	18

Investment Team

PORTFOLIO MANAGER	TOM NITSCHKE
INVESTMENT TEAM SIZE	5
INVESTMENT TEAM TURNOVER	LOW
STRUCTURE / LOCATION	PM & ANALYSTS/ADELAIDE
ASSET CONSULTANT	MERCER, STRATEGAS, INTERNAL TEAMS

Investment process

ASSET ALLOCATION	STRATEGIC, TACTICAL
SECTOR EXPOSURE	PASSIVE
GROWTH / DEFENSIVE SPLIT %	40/60
USE OF ALTERNATIVES	NO

Fund rating history

MARCH 2021	RECOMMENDED
APRIL 2020	INVESTMENT GRADE

What this Rating means

The 'Recommended' rating indicates that Lonsec has strong conviction the financial product can generate risk adjusted returns in line with relevant objectives. The financial product is considered an appropriate entry point to this asset class or strategy.

Strengths

- A dedicated multi-asset team focused on strategic and active asset allocation processes as the dominant driver of returns.
- Pragmatic and repeatable investment process supported by the Manager's culture of process improvement.
- Sound fundamental research capability driving a dynamic asset allocation style with a willingness to back high conviction views.

Weaknesses

- High key person risks in Tom Nitschke, Lead Portfolio Manager, and Thadeus McCrindle, CIO, who together hold the majority of the team's experience in asset allocation, portfolio construction and risk management.
- The investment team is light on resources, relative to Lonsec-rated peers, although leveraging inputs from various internal teams and external consultants partially mitigates this.
- Team incentive and remuneration structure could be better aligned, with greater weighting toward performance outcomes.

Fund Risk Characteristics

	LOW	MODERATE	HIGH
BUSINESS SUSTAINABILITY RISK		●	
CAPITAL VOLATILITY		●	
FOREIGN CURRENCY EXPOSURE		●	
REDEMPTION RISK		●	
SECURITY CONCENTRATION RISK		●	
SECURITY LIQUIDITY RISK		●	

Risk categories are based on Lonsec's qualitative opinion of the risks inherent in the financial product's asset class and the risks relative to other financial products in the relevant Lonsec sector universe.

BIometrics

Aggregated risks

	1	2	3	4	5	6	7
STD RISK MEASURE				●			

A Standard Risk Measure score of 4 equates to a Risk Label of 'Medium' and an estimated number of negative annual returns over any 20 year period of 2 to less than 3. This is a measure of expected frequency (not magnitude) of capital losses, calculated in accordance with ASFA/FSC guidelines.

ANALYST: LEON KHOO | APPROVED BY: SEBASTIAN LANDER

P 1-10

Bendigo Conservative Index

ISSUE DATE 23-03-2021

Features and benefits

	LOW	MODERATE	HIGH
COMPLEXITY		●	
ESG	●		

Fee profile

	LOW	MODERATE	HIGH
FEES VS. UNIVERSE		●	
FEES VS. ASSET CLASS	●		
FEES VS. SUB-SECTOR			●

Fee BIometrics are a function of expected total fee as a percentage of expected total return.

What is this Fund?

- The Bendigo Conservative Index Fund ('the Fund') is a 40%/60% growth/defensive low cost diversified offering that has access to a broad range of asset classes (including equities, fixed income, listed property and infrastructure) via a portfolio of underlying index tracking funds managed by Vanguard Investments.
- Sandhurst Trustees Limited ('the Manager' or 'Sandhurst') is a fully owned subsidiary of Bendigo Bank. Sandhurst has adopted an active investment style based on the belief that asset allocation is the dominant driver of long term returns within a multi-asset portfolio. Diversification by blending asset classes is used as a risk and volatility management strategy.
- The Manager seeks to provide investors with superior long-term returns through both Strategic Asset Allocation ('SAA') and Active Asset Allocation ('AAA'). The Manager believes using an Active Asset Allocation ('AAA') approach incorporating the factors of value, momentum and sentiment can provide better risk adjusted returns through the cycle. In addition, the Manager recognizes that each asset class has its moment in the market cycle, and that understanding what stage the market is entering, assessing liquidity and positioning accordingly, can generate alpha.
- As per the PDS dated 22 December 2020, the ongoing annual fees and cost to investors in the Fund includes (a) management fees of 0.41% p.a. and (b) net transaction costs for the Fund were 0.09% p.a. for the year ended 30 June 2020. Due to market conditions, transaction costs have been materially higher than prior years but are expected to be lower going forward.
- Transaction costs include explicit (e.g. brokerage, stamp duty, clearing) and implicit (buy/sell spreads in multi-asset) costs of buying and selling underlying assets and the cost of hedging/protection strategies incurred in managing the Fund. These costs are not paid to the Manager. Some transaction costs may be incurred due to investor activity (e.g. Fund applications/redemptions) and these may be recouped via the Fund's buy/sell spreads. The Fund's buy/sell spreads are +/-0.10% but as these can change depending on market conditions, please refer to the Manager for the latest spreads.

Using this Fund

This is General Advice only and should be read in conjunction with the Disclaimer, Disclosure and Warning on the final page.

- Low-Cost Diversified funds are well suited to investors who desire a portfolio that provides exposure to a range of asset classes via a single investment option, at a lower cost than traditional diversified funds. The 'low-cost' nature of these strategies is achieved by utilising index fund exposures at the underlying asset class level.
- The Fund is a conservative, defensive orientated portfolio that is best suited to long term investors. It is best suited to a long term investor who has medium to lower tolerance for investment risk over the long run.

Suggested Lonsec risk profile suitability

SECURE	DEFENSIVE	CONSERVATIVE	BALANCED	GROWTH	HIGH GROWTH
	●	●			

For guidance on appropriate asset allocations and risk profiles, refer to the latest Lonsec Strategic Asset Allocation Review and Risk Profile Definitions on our website.

Changes Since Previous Lonsec Review

- Continued process refinements include re-weighting macro factors (inclusion of liquidity and interest-rate regime factors) and right-sizing asset class allocations.
- Tail risk strategies and macro-risk management enhancements.

Lonsec Opinion of this Fund

People and resources

- Sandhurst forms part of the Bendigo Wealth division within Bendigo & Adelaide Bank. Sandhurst has 64 employees and is responsible for \$4.9 billion in funds under management at the time of this review. The investment team responsible for the diversified, multi-asset funds is led by Chief Investment Officer, Thadeus McCrindle. McCrindle is supported in the day to day management of the Fund by Portfolio Manager, Tom Nitschke. The investment team manages both a low cost suite of diversified funds as well as a suite of diversified funds investing into actively managed funds (to which this report relates). The team reports through to Head of Sandhurst Trustees, Justin Hoare, who in turn reports through to Head of Wealth, Paul Rohan.
- Nitschke has over 13 years' industry experience with the last seven as lead portfolio manager of the Sandhurst funds. Nitschke primarily holds the lead decision making role in the team, with manager selection and active asset allocation as his core functions. McCrindle, as Chief Investment Officer, provides macro and strategic perspectives in the decision-making process, leveraging off his wide and varied experience base. Notably, both have worked together for more than a decade. Lonsec considers Nitschke and McCrindle to have the relevant experience and expertise to execute on the Fund's strategy to achieve its objectives. Lonsec considers these two team members to be the primary

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Bendigo Conservative Index

key-person risks for the Fund and considers this risk to be high.

- In addition to Nitschke and McCrindle, the team comprises a further three analysts and takes inputs from a wide range of internal and external consultants. Lonsec considers the team to have sound capability, but is mindful that beyond the two senior managers, team co-tenure and experience is relatively modest. Team size is also considered low relative to peers, although the use of consultants partially mitigates this as does the team's culture of process improvement, noting that in recent years, there has been a focus on more predictive market indicators, relative valuation measures and improved scenario-testing models. In addition the asset allocation process is a generally quantitatively-driven framework, alleviating the need for a large team. It was noted that the investment team also leverages of internal resources within the group, including the Fixed Income, Superannuation and Economics teams. Nonetheless, in Lonsec's opinion, there is scope to add additional resources if/when complementary skill-sets are identified to further strengthen internal capability and reduce the reliance on external consultants. Moving forward, Lonsec will continue to monitor the team's workload and capacity, functional structure and team co-tenure.
- The three analysts, Lewis Einarson, Dom Chiuchiolo and Shirley He, have the relevant skills and academic backgrounds for due diligence and decision-support roles. Although their level of industry experience is light, they are mentored/supported by the senior members of the wider Sandhurst investment team and have demonstrated a level of competence sufficient to support the portfolio managers. Lonsec will continue to monitor the performance and rigour of work generated by the analyst team in future reviews.
- Positively, an advantage of the investment team (apart from the CIO) is that they do not have business management or marketing responsibilities. This allows the team to focus solely on investment management and the performance of the Fund rather than profitability and/or broader management issues.
- The investment team members' variable remuneration is assessed on both qualitative and quantitative factors with weighting skewed to non-investment outcomes. Lonsec notes that remuneration is linked to investment performance (approximately 25%) promoting the alignment of interests between the investment team and investors. Also, there are qualitative metrics aligned to behavioural aspects, in addition to profitability of the Manager and parent organisation. Overall, Lonsec considers the alignment of interests to be lower than its peers and this has scope for improvement.

Asset allocation

- Sandhurst consider asset allocation to be the dominant driver of long term returns within a multi-asset class portfolio. The majority of the investment team's focus is on the Active Asset Allocation ('AAA') framework which drives the SAA-anchored investment process.
- The starting point for asset allocation discussions is the investment policy itself which stipulates the

investment objectives, desired risk tolerances and investment limits. The Manager formulates a SAA from historical asset class volatility, correlations and normalised returns. The SAA, which is reviewed every three years, forms the neutral position of the Fund from which the AAA is derived. The changes made in the last SAA review in 2018 saw initial allocations to emerging market equities, global infrastructure and a reduction to domestic equities. Lonsec believes these changes were in line with the Manager's long-term investment approach and represented a logical evolution of allowing room for greater global diversification.

- As stated, in between SAA reviews, the main driver of the investment process is the AAA approach which aims to take an intra-cycle view, typically for the upcoming 12-18 month period. The two main inputs into the process are (i) value, momentum and sentiment signals, and (ii) a 'four-phases' style business and market cycle framework. At the time of Lonsec's review, the team had recently added a Liquidity factor into the process. Quantitative scores are generated from the signals and cross analysed with the output from the cycle analysis. Lonsec believes this to be an intuitive approach founded on well known signals that are supported by academic evidence. In addition, Lonsec believes the focus on tilting the portfolio towards assets that are favoured at certain points in the market cycle is logical. While results are promising and the decision making framework appears robust, Lonsec notes the newer parts of the process have evolved over recent years, and therefore will continue to be assessed in future reviews.
- The Fund has a 40%/60% growth/defensive asset allocation diversified across asset classes (including equities, fixed income, listed property and infrastructure) via underlying index tracking funds managed by Vanguard Investments.

Research approach

- Ongoing research has been dedicated to incorporating new market signals and valuation concepts within the AAA framework. In the last year, the Manager has also included additional analysis into global liquidity conditions into the process as they have identified a material influence on market returns. In addition, the Manager also incorporates research from external parties (e.g. Strategas Research) who provide input into market cycle analysis.
- Lonsec considers the Sandhurst asset allocation research process to be thorough (in terms of the information gathered and assessed), robust and clearly articulated. The team's focus on fundamentals adds valuation-based elements which adds a level of capital preservation. This is complimented by momentum and sentiment factors which incorporates asset-class beta into the framework.
- While viewing the process enhancements as positive, Lonsec is conscious of the small size of the team which brings a potential lower diversity of perspective, less robust peer reviews and elevates key-person decision risks. Overall, Lonsec considers the Manager's research approach to be fundamentally

Bendigo Conservative Index

sound and sufficiently robust to achieve its intended outcomes.

ESG Integration

- The Manager has articulated a commitment to the integration of ESG within their investment process and relevant ESG policies are freely available on the firm's website. Overall, Lonsec views this commitment to be in-line with peers.
- That said, as the Fund utilizes underlying index exposures, there is minimal ESG integration or ESG analysis across the process and portfolio. Therefore Lonsec considers the overall level of ESG integration within this fund to be low.

Portfolio construction

- The Manager constructs portfolios by assigning the appropriate asset class weightings in accordance to the SAA and AAA outcomes. There are both quantitative and qualitative elements in this process, informed by a level of judgement and diversity of views. Sound fundamental research drives the asset allocation style, and there is a willingness to back high conviction views. Final portfolio outcomes are also influenced by relative risk-return and pragmatic forward-looking approaches which is favourable in longer-term upward trending markets. Lonsec considers this flexibility in approach and style to be a key advantage of the team.
- Vanguard Investments has been appointed as the team's strategic partner to manage the underlying asset class allocations, except for cash which is managed internally. Lonsec has high regard for Vanguard, particularly in the domestic and global equities asset classes. While the market cap weighted indexing methodology is relatively simplistic in nature, the approach is cost-effective, highly liquid and intuitively appealing. The underlying Vanguard funds are backed by strong experienced teams, who have successful track records in replicating benchmark-like performance at low cost.
- Lonsec notes the introduction of the Alternatives asset class into the Fund and views this positively. Lonsec believes the Alternatives exposure increases the Fund's downside protection properties, however the Fund's low cost fee budget and liquidity priorities may be a constraint to this asset class' allocation.

Risk management

- Lonsec believes that the Sandhurst investment team implements a reasonable and robust risk management process within a clear framework. Sandhurst adopts reasonably wide constraints in the management of the diversified strategies. Daily monitoring, regular holdings analysis, aggregated risk exposure monitoring and scenario analysis form part of the risk management process. The team uses quantitative proprietary models to analyse credit risk, interest rate risk, liquidity, asset class valuations, momentum, reinvestment and macroeconomic risks.
- Sandhurst also has a dedicated Risk and Compliance team focused on regulatory compliance and operational risks. A Middle Office team separately monitors portfolio and derivatives exposures via third-party risk tools on a regular basis. Lonsec

considers Sandhurst's risk management practices to be sufficiently robust.

Performance

- The Fund aims to provide returns after fees of 2% above inflation over a full market cycle (typically seven to 10 years).
- Over the three and five year period the Fund has generated 6.1% p.a. and 6.3% p.a. (all figures to 31 January 2021, net of fees) respectively, to outperform the peer median. Shorter term one year performance impacted by extreme market conditions in 2020 was at 2.7% p.a. also above the peer median. More importantly, the Fund has achieved its return objectives across all time horizons, although with higher risk relative to the peer median. The Fund's Sharpe and Information Ratios are greater than the peer median over all time periods assessed indicating a stronger risk-adjusted return relative to peers.
- During the COVID-19 led market drawdown, the Active Asset Allocation efforts provided a level of defensiveness relative to its SAA, and the Fund's strong recovery of 5.4% over six months to January 2021, has outperformed most peers. However, the Fund's deepest drawdown was -8.7%, circa 1.4% greater than the peer median, reflecting higher market beta and momentum factors within the strategy. This is consistent with the style employed by the Manager.

Overall

- Lonsec has upgraded the Fund to a '**Recommended**' rating at this review. The investment team led by CIO, Thadeus McCrindle, and Lead Portfolio Manager, Tom Nitschke, is capable and generally 'punching above their weight' for a small investment team relative to the peer group. Performance to-date has been strong on both a peer-relative and risk-adjusted basis. Lonsec believes the team has adopted a pragmatic and repeatable investment process founded on a robust decision-making framework.
- However, beyond the CIO and Portfolio Manager, the level of experience in asset allocation and portfolio construction is low relative to peers, representing elevated key person risks. Finally, Lonsec notes the evolving active asset allocation process requires continued assessment over time and will monitor this at future reviews.

People and Resources

Corporate overview

Sandhurst Trustees (the 'Manager') is the investment management services group within Bendigo and Adelaide Bank. The Manager's focus is on active asset allocation and risk management, implemented via a multi-manager and multi-index fund allocation process across a range of asset classes. As at February 2021, Sandhurst managed \$4.9 billion across a suite of multi-asset class products. Sandhurst Trustees is also the Responsible Entity of the Fund.

Sandhurst Trustees, established in 1888, has evolved beyond its traditional trustee roots into a full service wealth manager offering managed funds, superannuation, commercial loans, corporate trustee and custodial services. In 1992, Sandhurst Trustees

Bendigo Conservative Index

merged with the Bendigo Building Society, which became Bendigo Bank, which in turn was merged into Bendigo and Adelaide Bank in 2007. Sandhurst is a wholly-owned subsidiary of the Bendigo and Adelaide bank, Australia's 5th largest bank, listed on the ASX.

Size and experience

NAME	POSITION	EXPERIENCE	
		INDUSTRY /	FIRM
TOM NITSCHKE	PORTFOLIO MANAGER	13 /	13
THAD MCCRINDLE	CIO/HEAD OF INVESTMENTS	19 /	15
LEWIS EINARSON	INVESTMENT ANALYST	5 /	4
DOM CHIUCHIOLO	INVESTMENT ANALYST	5 /	3
SHIRLEY HE	INVESTMENT ANALYST	3 /	3

The Sandhurst Diversified Funds investment team is responsible for the investment strategy, asset allocation, passive strategy selection and ongoing monitoring of the Fund. Profiles of the five team members below:

Tom Nitschke is the Lead Portfolio Manager of the Sandhurst Diversified Funds. Nitschke has over 13 years' industry experience with the last seven as lead portfolio manager of the Sandhurst Diversified Funds. His responsibilities include active asset allocation, portfolio performance, investment strategy and manager selection. He has a background in manager research and selection, SAA/TAA, capital markets research and asset allocation process improvement. Nitschke has held roles at Adelaide Managed Funds (part of Adelaide Bank), before its merger with Sandhurst, and was part of the pioneering team which launched and managed the Bendigo Index funds in 2011. In 2014, he was appointed to the current position of portfolio manager.

Thadeus McCrindle, Chief Investment Officer at Sandhurst, has over 18 years' industry experience with prior roles in credit and fixed income portfolio management, multi-asset portfolio management, manager and capital markets research, active asset allocation and portfolio construction. His tenure covers roles at JP Morgan and Bendigo and Adelaide Bank. McCrindle holds a return-generation and strategy oversight function within the team. He is also responsible for fixed income funds and superannuation products at Sandhurst, and spends approximately half his time with the Diversified Funds team.

Lewis Einarson, Investment Analyst, joined the Bendigo and Adelaide Bank group in 2015. He was initially in the bank's Treasury department, working in asset securitisation, before joining the Sandhurst investment team. Einarson is primarily responsible for Australian equities, property and asset allocation. He received the CFA Charter in 2019.

Dom Chiuchiolo, Investment Analyst, comes from the bank's graduate program, having spent time in Statutory and Regulatory reporting and Securitisation. He joined the investment team in 2018 and has primary focus on the global equities asset class, performance reporting and asset allocation. He received the CFA Charter in 2021.

Shirley He, Investment Analyst, joined the Sandhurst investment team in 2018. She has a lengthy academic background, having graduated with a Bachelor of Finance, she then stepped into a teaching and research

assistant role in the University of Adelaide's Business School. Her current responsibilities include fixed income and alternatives asset classes, strategic and tactical asset allocation research.

All analysts also contribute to the manager research, selection and manager performance reviews. For new manager considerations, Mercer asset consultants will provide a shortlist of recommended managers, which will then be researched by the team, including site/personnel visits before being selected for portfolio inclusion. The analyst team conducts asset allocation research projects as directed by the two senior team members.

Remuneration / alignment of interests

The investment team's remuneration structure comprises of fixed and variable components. The variable component is weighted accordingly: 25% weighting to investment outcomes and performance; 25% weighting to behavioural aspects and qualitative factors; 25% weighting to profitability of the Manager and; 25% weighting to profitability of the parent organisation. The structure is designed to incentivise investment performance and align investor and investment staff interests.

Asset consultant

The Sandhurst investment team draws on a wide range of consultants as part of their research into asset allocation and manager selection decisions. These include Mercer, Strategas and also the internal resources of the bank, which include Group Treasury, Economics and Market Research, and the fixed income team. External asset consultants can be used, both for idea generation and asset allocation matters. In particular, Sandhurst benchmarks its expected risk and return assumptions against external consultants' capital market assumptions and peers as a sense check.

Asset Allocation

Strategic asset allocation

Reviewed every three years, the process of Strategic Asset Allocation (SAA) is to construct a neutral investment plan for the full market cycle, approximately seven to 10 years. The SAA forms the neutral position in which active asset allocation references. A SAA review is presented to the Sandhurst Investment Committee, with changes recommended for approval by the committee.

The SAA process starts with setting capital market assumptions, based on past asset and market information on return, volatility and correlation. The model assumes historical volatility and correlations persist in the market cycle ahead, however the investment team normalises returns for believed anomalies. Capital market assumptions are cross analysed with inputs from consultants (Mercer, Strategas) as well as various market and research participants including the bank's internal teams and Vanguard. Optimisation of the SAA, calibrating risk-return within a set of constraints is undertaken, applying progressive risk-level exposures across the five growth-defensive profiles. As a risk control measure, the resilience of the portfolios are tested in various conditions including hypothetical shocks. Finally, the

Bendigo Conservative Index

ISSUE DATE 23-03-2021

portfolio's diversification levels are cross-checked against industry peers.

The Fund's asset allocation has a 40%/60% Growth/Defensive profile and as at February 2021 is summarised in the table below.

Asset allocation

ASSET CLASS	SAA BENCHMARK	MIN	MAX	CURRENT ALLOCATION
AUSTRALIAN EQUITIES	14.5%	5%	30%	17.5%
GLOBAL EQUITIES	14.5%	5%	30%	19.5%
EMERGING MARKETS	3%	0%	30%	4%
PROPERTY AND INFRASTRUCTURE	8%	0%	20%	1%
ALTERNATIVES	0%	0%	20%	3.5%
AUSTRALIAN FIXED INTEREST	22.5%	20%	65%	34.5%
GLOBAL FIXED INTEREST	22.5%	20%	65%	12%
CASH	15%	0%	40%	8%

Tactical/Dynamic asset allocation

The Manager's Active Asset Allocation process takes an intra-market cycle view of 12 to 18 months, based off outcomes from the investment team's monthly meetings.

The Active Asset Allocation decision outcomes are fundamentally anchored, incorporating five major factors, Valuation, Momentum, Sentiment, Liquidity and Quadrant (economic regime). The final two factors were added recently and weightings recalibrated. Valuation (35% weight) for each asset class is conducted monthly and a five-level valuation score is assigned. Momentum and Sentiment factors (17.5% weight each) are also measured, guiding position entry and exits. Finally Liquidity (20% weight) and Quadrant (10% weight) as newly introduced factors are also considered. Each tradeable asset class is assigned a score which guides its overall weighting. Asset class tilt decisions are then made by the portfolio manager in conjunction with the CIO.

Macro data flow and liquidity conditions help build their view on the current market cycle. The analysis of macro data flow formulates the team's views of where the market cycle is positioned within a four quadrant growth-inflation regime framework. This also guides their over/under weights to specific asset/sub-asset class positions. Finally, market risk analysis is conducted to assess positions against extreme events. Returns are regularly monitored versus a select peer group.

The team utilizes a range of dashboarding signals (both micro and macroeconomic indicators) as current/backward and forward-looking indicators to monitor markets – liquidity conditions, economic region's growth metrics, asset class indicators/inflection points, short and medium-term trends. Bloomberg systems are used as the primary tool for this.

Research Approach

The Manager has both a quantitative and qualitative research approach in its SAA and AAA process. Research is fundamentally anchored, informed by a wide range of metrics and dashboarding tools, and complemented by internal and external consultant views.

As a diversified product, with an investment philosophy predicated on strategic and active asset allocation invested into index funds, underlying fund manager research does not play a role in the management of the Fund.

Portfolio Construction

Overview

Portfolio construction is undertaken by the lead portfolio manager with the objective of balancing risk and return budgets within the SAA framework and AAA outcomes. The quantitative optimisation process informs the sub-asset class allocations and qualitative judgement is also applied. In constructing the portfolio, the investment team aims to eliminate diversifiable macro-risks, control beta and balance sub-asset class and currency risk exposures, within the context of return targets.

Diversification levels are calibrated within the risk management framework and compared against industry peers. The team, informed by fundamental research, has the flexibility to take high conviction positions. In addition, scenario modelling of potential changes is conducted to ensure meaningful contribution to the portfolio. The lead portfolio manager implements portfolio changes only with approval from the CIO.

Underlying manager allocation

Sandhurst has selected Vanguard as its passive management partner. Vanguard manages the index tracking parts of the suite of Sandhurst's Managed Wholesale Index Funds. Cash allocations are internally managed by the investment team. Lonsec's conviction in each strategy, where applicable, is provided in parentheses below.

Australian equities

- Vanguard Australian Shares Index Fund (very strong)

The fund aims to match the performance of the S&P/ASX 300 Accumulation Index before fees, expenses and tax.

Global equities

- Vanguard International Shares Index Fund (very strong)

The fund aims to match the performance of the MSCI World Ex Australia Index (with net dividends reinvested) in Australian dollars before fees, expenses and tax.

- Vanguard International Shares Index Fund (Hedged) (very strong)

The Fund seeks to track the return of the MSCI World ex-Australia Index (with net dividends reinvested) hedged into Australian dollars before taking into account fees, expenses and tax.

- Vanguard Emerging Markets Shares Index Fund (strong)

The fund aims to track the return of the MSCI Emerging Markets Index (with net dividends reinvested) in Australian dollars before fees, expenses and tax.

Property and Infrastructure

- Vanguard Australian Property Securities Index Fund (very strong)

The fund aims to match the performance of the S&P/ASX 300 A-REIT Accumulation Index before fees, expenses and tax.

ANALYST: LEON KHOO | APPROVED BY: SEBASTIAN LANDER

Bendigo Conservative Index

- Vanguard Global Infrastructure Index Fund (strong)
The fund aims to match the performance of the FTSE Developed Core Infrastructure Index (with net dividends reinvested) in Australian dollars, before fees, expenses and tax.

Australian fixed interest

- Vanguard Australian Fixed Interest Index Fund (very strong)

The fund aims to track the return of the Bloomberg AusBond Composite 0+ Yr Index before taking into account fund fees, expenses and tax.

- Vanguard Australian Corporate Fixed Interest Index Fund (strong)

The fund aims to track the return of the Bloomberg AusBond Credit 0+ Yr Index before taking into account fund fees, expenses and tax.

- Vanguard Australian Government Bond Index Fund
The fund aims to track the return of the Bloomberg AusBond Govt 0+ Yr Index before taking into account fund fees, expenses and tax.

- Vanguard Australian Inflation-Linked Bond Index Fund

The fund aims to track the return of the Bloomberg AusBond Inflation Treasury 1+ Yr Index before taking into account fees, expenses and tax.

International fixed interest

- Vanguard International Fixed Interest Index Fund (Hedged) (very strong)

The fund aims to track the return of the Bloomberg Barclays Global Treasury Index (Hedged to \$A) before fees, expenses and tax.

- Vanguard International Credit Securities Index Fund (Hedged) (strong)

The fund aims to match the performance of the Bloomberg Barclays Global Aggregate Government-Related And Corporate Index in Australian dollars, before fees, expenses and tax.

Risk Management

Risk limits

The Sandhurst investment team believes that strong risk management starts with a detailed understanding of the underlying exposures together with a deep appreciation of current and potential market conditions. The investment team controls risk at a broad level by diversifying across asset classes within predetermined range limits. Asset allocations are monitored daily where +/-1% movements from targets are flagged and a tolerance of +/-2% set to ensure targeted asset allocations are maintained.

Quarterly, the team assesses underlying risk exposures via holdings analysis. Analysis into equity positions is conducted in Bloomberg, where the team analyse total look-through exposures such as geography, sector, and fundamentals. Holdings analysis for fixed income incorporates fund/asset class duration analysis, regional and sector exposures and yield analysis, as well as credit risk assessments. The outputs are aggregated at the asset class level to form aggregate risk positions for the Fund. Asset class risk exposure metrics include equity and credit betas, duration and currency exposures.

Risk analysis reviews current and potential positions and takes holdings analysis outputs to analyse expected

portfolio outcomes against a range of potential economic scenarios. This process occurs concurrently with the AAA process and can shape asset allocation outcomes. Scenario analysis and stress-testing are conducted with Bloomberg PORT.

Risk monitoring

Sandhurst works within the Bendigo and Adelaide Bank's governance and risk management framework; incorporating compliance, operational risk management, credit and market risk. The Governance framework is clearly defined with roles and responsibilities clearly articulated and evidenced by a

range of regular meetings and reporting.

The Sandhurst Investment Governance Committee acts as another separate layer of risk and governance oversight, which ensures that the Fund operates within the product disclosure and Board approved SAA ranges and associated operational ranges. The committee approves changes to major investment policies, SAA range limits and represents the investor, holding the Manager accountable for decisions, reviewing performance and ensuring delivery of objectives. Portfolio positions are additionally monitored by middle office and internal legal and compliance teams.

Implementation

The Fund invests in a combination of externally managed passive index funds, with a minor allocation to internal products for its cash allocation. Sandhurst uses futures for the majority of tactical positions and cash flows are primarily used to rebalance asset class allocations. Rebalancing is flagged when weightings move 1.0% from target levels and is actioned within the +/-2.0% tolerance limit. To the extent possible, the investment team uses the overlay of derivatives/futures to gain necessary exposures in order to minimize transaction and taxation costs.

Currency management

The investment team can employ derivatives to hedge currency exposures at targeted levels within their risk-management frameworks. Some of the underlying funds that the Fund invests in, employ currency hedging through the use of forward foreign exchange contracts to manage currency risk. The returns of those underlying funds that employ currency hedging are thus relatively unaffected by currency fluctuations.

Risks

An investment in the Fund carries a number of standard investment risks associated with investment markets. These include performance, liquidity, counterparty, market and tax risks. These and other risks are outlined in the PDS and should be read in full and understood by potential investors. Lonsec considers the following to be the major risks:

Market risk

Investment returns are influenced by the performance of the market as a whole. This means that investments can be affected by things like changes in interest rates, investor sentiment and global events, depending on which markets or asset classes are invested in and the time-frame considered.

Bendigo Conservative Index

ISSUE DATE 23-03-2021

Currency risk

There is the chance that the value of an unhedged foreign investment, measured in Australian dollars, will decrease because of unfavourable changes in currency exchange rates. In the case of hedged investments, currency hedging involves costs and implementation risks due to the volatility of currency and securities markets, and there are impacts for the income distributions from those underlying funds. When the Australian dollar is appreciating relative to other currencies, the gains from currency hedging may result in significant additional income being distributed. Conversely, when the Australian dollar is depreciating relative to other currencies, the losses from currency hedging can totally offset other income received, resulting in no income distribution from those underlying funds (that employ currency hedging) for the period. This may impact the Fund's distribution to investors.

Derivative risk

The primary risks associated with the use of derivative contracts are: the values of the derivative may fail to move in line with the underlying asset (a performance difference); the potential lack of liquidity of the derivative; the Fund or underlying funds may not be able to meet payment obligations for the derivative contracts as they arise; and the counterparty to the derivative contract may not meet its obligations under the contract.

ANALYST: LEON KHOO | APPROVED BY: SEBASTIAN LANDER

P 8-10

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Quantitative Performance Analysis - annualised after-fee % returns (at 31-1-2021)

Performance metrics

	1 YR		3 YR		5 YR		7 YR	
	FUND	PEER MEDIAN	FUND	PEER MEDIAN	FUND	PEER MEDIAN	FUND	PEER MEDIAN
PERFORMANCE (% PA)	2.66	1.66	6.06	5.18	6.27	4.99	6.23	5.03
STANDARD DEVIATION (% PA)	9.43	7.81	6.23	5.02	5.22	4.16	4.94	3.96
EXCESS RETURN (% PA)	1.41	0.41	0.74	-0.14	0.70	-0.59	0.43	-0.77
OUTPERFORMANCE RATIO (% PA)	83.33	62.50	75.00	50.00	70.00	40.00	63.10	33.33
WORST DRAWDOWN (%)	-8.72	-7.29	-8.72	-7.29	-8.72	-7.51	-8.72	-7.51
TIME TO RECOVERY (MTHS)	8	8	8	8	8	8	8	8
SHARPE RATIO	0.25	0.18	0.78	0.74	0.92	0.88	0.90	0.82
INFORMATION RATIO	0.49	0.26	0.38	-0.14	0.43	-0.41	0.29	-0.76
TRACKING ERROR (% PA)	2.87	1.53	1.94	1.13	1.61	1.42	1.49	1.32

PRODUCT: BENDIGO CONSERVATIVE INDEX

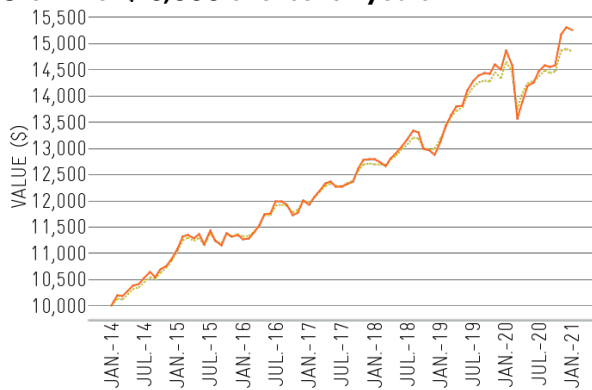
LONSEC PEER GROUP: MULTI-ASSET - 21-40% GROWTH ASSETS - LOW-COST DIVERSIFIED

PRODUCT BENCHMARK: LONSEC STRATEGIC MULTI-ASSET (TRADITIONAL) 30% GROWTH INDEX

CASH BENCHMARK: BLOOMBERG AUSBOND BANK BILL INDEX AUD

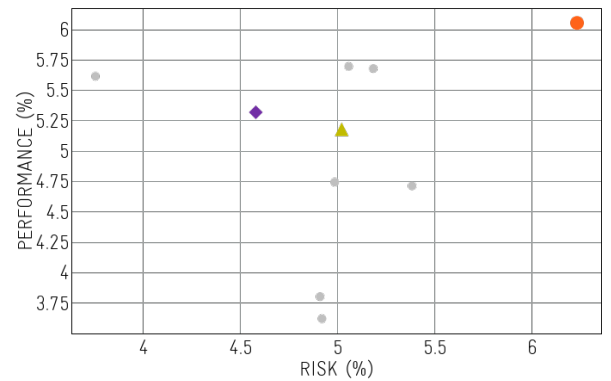
TIME TO RECOVERY: NR - NOT RECOVERED, DASH - NO DRAWDOWN DURING PERIOD

Growth of \$10,000 over seven years



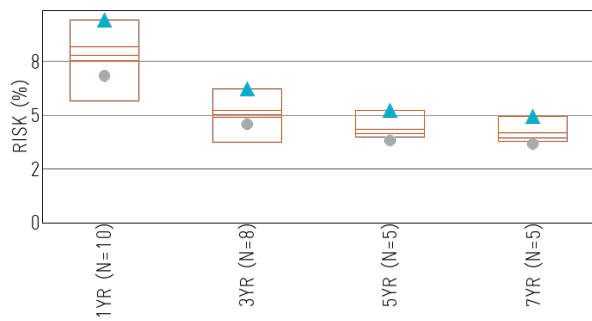
— BENDIGO CONSERVATIVE INDEX
 - - - LONSEC STRATEGIC MULTI-ASSET (TRADITIONAL) 30% GROWTH INDEX

Risk-return chart over three years



● BENDIGO CONSERVATIVE INDEX
 ◆ LONSEC STRATEGIC MULTI-ASSET (TRADITIONAL) 30% GROWTH INDEX
 ▲ PEER MEDIAN
 ● PEERS

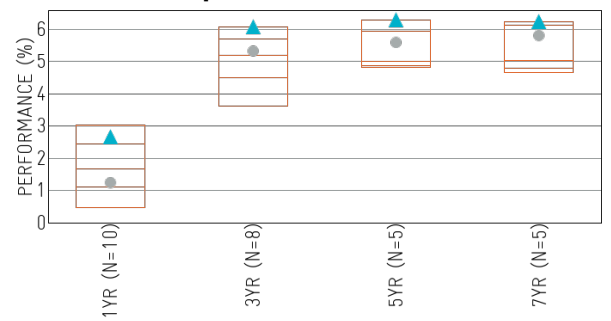
Quartile chart — risk



▲ BENDIGO CONSERVATIVE INDEX
 ● LONSEC STRATEGIC MULTI-ASSET (TRADITIONAL) 30% GROWTH INDEX

N: NUMBER OF ACTIVE FUNDS

Quartile chart — performance



▲ BENDIGO CONSERVATIVE INDEX
 ● LONSEC STRATEGIC MULTI-ASSET (TRADITIONAL) 30% GROWTH INDEX

N: NUMBER OF ACTIVE FUNDS

Bendigo Conservative Index

Glossary

Total return 'Top line' actual return, after fees
Excess return Return in excess of the benchmark return
Standard deviation Volatility of monthly Absolute Returns
Tracking error Volatility of monthly Excess Returns against the benchmark (the Standard Deviation of monthly Excess Returns)
Sharpe ratio Absolute reward for absolute risk taken (outperformance of the risk free return (Bank Bills) / Standard Deviation)
Information ratio Relative reward for relative risk taken (Excess Returns / Tracking Error)
Worst drawdown The worst cumulative loss ('peak to trough') experienced over the period assessed
Time to recovery The number of months taken to recover the Worst Drawdown
Snail Trail A trailing 12-month relative performance and relative risk measurement over the benchmark. The trail is generated using a 12-month rolling window over the specified period

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