

## Fundhost Limited

ABN 69 092 517 087 | Australian Financial Services Licence (AFSL) No. 233045



Polen Capital Management, LLC Corporate Authorised Representative  
(CAR) No. 001285858 of Montgomery Investment Management Pty Ltd  
ABN 73 139 161 701 | AFSL 354 564

## Information Booklet

Dated 30 September 2021

The information in this document forms part of the product disclosure statement dated 30 September 2021 and issued by Fundhost Limited as responsible entity of

# Polen Capital Global Growth Fund Class B Units

ARSN 647 518 723 | APIR FHT1389AU

### Responsible Entity

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## About this Information Booklet

The information in this Information Booklet forms part of the Product Disclosure Statement (**PDS**) issued by Fundhost Ltd (**Fundhost, we or us**) as responsible entity of the Polen Capital Global Growth Fund, ARSN 647 518 723 (**The Fund**) and dated 30 September 2021.

Defined terms used in the PDS have the same meaning in this Information Booklet unless stated otherwise.

We recommend that you keep a copy of the PDS for The Fund and this Information Booklet handy for future reference.

The Information contained in the PDS and this Information Booklet is general information only and has been prepared without taking into account your personal objectives, financial situation or needs. You should read this Information Booklet together with the PDS (in their entirety) before making a decision to invest in The Fund. You should consult a licensed financial adviser to obtain financial advice that is tailored to suit your personal circumstances before proceeding to acquire or dispose of units in The Fund.

You can access the PDS and this Information Booklet on our website at [www.fundhost.com.au](http://www.fundhost.com.au) or at [www.montinvest.com](http://www.montinvest.com). Fundhost will provide you, free of charge, a paper copy of the PDS and this Information Booklet upon request when you contact us on +61 2 8223 5400.

National Australia Bank Limited ABN 12 004 044 937 (**NAB**) has no liability or responsibility to you for any act done or omission made in accordance with the terms of the Custody Agreement. NAB makes no statement in the PDS or this Information Booklet and has not authorised or caused the issue of it.

Investments of The Fund do not represent investments in, deposits with or other liabilities of, NAB or any other member of the NAB group of companies (**NAB Group**). Neither NAB, nor any other member of NAB Group, in any way stands behind the capital value, nor do they guarantee the performance of the investment or the underlying assets of The Fund, or provide a guarantee or assurance in respect of the obligations of Fundhost or its related entities. NAB has no liability or responsibility to you for any act done or omission made in accordance with the terms of the Custody Agreement. NAB makes no statement in the PDS or this Information Booklet and has not authorised or caused the issue of it.

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# Part A

## How the Fund Works

### Investing and withdrawing

#### Investing

Additional investments can be made at any time in writing and will generally be processed daily.

#### Distributions

The ex-distribution mid-price is calculated by taking the value of the investments of The Fund and taking away the value of the liabilities as defined in The Fund's constitution including the provision for distribution. We make no adjustment for costs of buying or realising investments (called a buy-sell spread). We divide the result of this by the number of units we have on issue. These steps give us a per unit price used in connection with reinvestment of distributions.

We distribute all taxable income to investors each year, including any taxable capital gains. Distributions may also carry imputation or other tax credits.

#### Withdrawing

Units in The Fund are not listed on any stock exchange like the ASX, so you cannot sell your units through a stockbroker.

If you want to withdraw your money, simply contact us in writing and tell us how much you need to withdraw. This is called a redemption request.

We accept scanned or faxed redemption requests on the following conditions:

- all instructions must be legible
- instructions must bear your investor number and signature and
- redemption proceeds will only be transferred to the financial institution account previously nominated on the application form.

You will need to accept full responsibility (to the extent permitted by law) for loss arising from us acting upon faxed or scanned instructions which comply with these security processes and you also agree to release and indemnify us in respect of any liabilities arising from us acting on faxed or scanned instructions (including future instructions), even if those instructions are not genuine. Also you agree that neither you nor any other person has any claim against us in relation to a payment made or action taken under the facsimile or scanned instruction service if the payment is made in accordance with these conditions. These terms and conditions are additional to any other requirements for giving redemption instructions.

The amount of money you receive is determined by the unit price we calculate at the time of your redemption request. We can withhold from amounts we pay you any amount you owe us or we owe someone else relating to you (for example, the tax office).

We generally pay all redemption proceeds in cash, but we are permitted under the constitution for The Fund to pay proceeds in kind (i.e. in specie share transfer).

## Delays

In certain circumstances we may need to delay withdrawal of your money. We can delay withdrawal of your money for 180 days or such period as considered appropriate in our view in all the circumstances if:

- there are not enough investments which we can easily turn into cash (the law dictates this). We don't anticipate The Fund would ever become illiquid but if it did, the law says we can (if we wish) make some money available, and requires us to allocate it on a pro rata basis amongst those wanting to exit or
- we receive a quantity of redemption requests representing more than 20% of the value of the investments of The Fund. In this case we can stagger withdrawal payments.

In certain circumstances we can also delay withdrawal of your money for so long as the relevant event continues. The constitution sets out the full range of circumstances in which we can delay withdrawal of your money and these include (among others) if:

- there are not enough investments which we can easily turn into cash (the law dictates this). We don't anticipate The Fund would ever become illiquid but if they did, the law says we can (if we wish) make some money available, and requires us to allocate it on a pro rata basis amongst those wanting to exit
- we receive a quantity of withdrawal requests representing more than 20 per cent of the value of the investments in The Fund. In this case we can stagger withdrawal payments

- something outside our control affects our ability to properly or fairly calculate the unit price (for example, if the investments are subject to restrictions or if there is material market uncertainty like a stock market crash)
- a portion of the Fund's assets comprise illiquid assets (that is, assets not readily converted to cash). In this case Fundhost can redeem such number of units that correspond to the portion of The Fund's liquid assets (that is, assets readily converted to cash). For example, if an investor requests redemption of all of their units and The Fund's assets comprise 10% of illiquid assets, Fundhost may determine to redeem only 90% of the investor's units. Fundhost may redeem the remaining units at such future time, or at times over such period, as it determines
- an emergency or similar state of affairs occurs which, in our reasonable opinion, makes it impractical to redeem units or which might be prejudicial to the remaining investors
- there is a closure or material restriction on trading on the major global stock exchanges or realisation of the assets cannot be effected at prices which would be obtained if assets were realised in an orderly fashion over a reasonable period in a stable market or
- we otherwise consider it is in the best interests of the investors to delay withdrawal of units.

The constitution sets out the full range of circumstances in which we can delay withdrawal of your money.

### **We can give you back your invested money without you asking**

In certain circumstances we can, or may be required to, also redeem some or all of your units without you asking. These circumstances include:

- if you breach your obligations to us (for example, you provide misleading information in your unit application form)
- to satisfy any amount of money due to us (as responsible entity or in any other capacity relevant to The Fund) by you
- to satisfy any amount of money we (as responsible entity or in any other capacity relevant to The Fund) owe someone else relating to you (for example, to the tax office)
- where we suspect that law prohibits you from legally being an investor or
- such other circumstance as we determine in our absolute discretion (but we must always act in the best interests of investors as a whole when deciding to do this).

The constitution sets out the full range of circumstances in which we can redeem your units without you asking.

### **How we calculate unit prices**

We calculate unit prices in three steps:

1. we calculate the value of the investments of each class of units in The Fund and take away the value of the liabilities in each class of units in The Fund, as defined in The Fund's constitution
2. we divide this result by the number of units in the class we have on issue to obtain the unit mid-price
3. we then make an adjustment (up for the entry price, to take account of the costs of buying investments or down for the exit price to take account of the costs of realising investments) called a buy-sell spread. The buy-sell spread does not represent a fee to Fundhost, Montgomery or Polen Capital and is discussed in more detail in "Additional explanation of fees and costs" in the PDS.

These steps give us a price per unit.

# Part B

## Benefits of Investing in The Fund

### Benefits of Investing in The Fund

Key attributes of The Fund include:

#### Concentrated Portfolio →

##### "High Active Share"

- Portfolio constructed with a select group of high-quality companies
- Use of the guardrails of strong balance sheets, strong free cash flow, strong return on equity, stable to improving margins and real-organic revenue growth
- Best ideas portfolio - impartial to index sector and position weightings

#### Long Holding / Compounding Period →

##### "Time Arbitrage"

- Long-term focus on company fundamentals and competitive advantages
- Portfolio returns are intended to be generated through the compound earnings growth of competitively advantaged companies - share prices generally follow earnings growth
- the historical average holding period exceeds five years

#### Risk Management →

##### "Don't Lose Mentality"

- Only invest in businesses Polen Capital believes are financially superior and competitively advantaged - Margin of Safety

- Focus on long-term preservation of capital
- Portfolio construction parameters include position size limits and sector weighting limits
- Currency policy and political risks are considered when investing

#### Outcome Orientation →

##### "Weighing Machine vs. Voting Machine"

- Seeking businesses who generate double digit returns with lower levels of risk (noting that returns are not guaranteed)
- More than 30 years of success through consistent application of the Polen Capital investment process
- Polen Capital doesn't make market predictions and is always close to fully invested
- Unemotional selling with an absolute return mentality

#### ESG Integration →

##### "ESG is key to financial sustainability"

- ESG analysis embedded in proprietary research of companies
- Supplemented by use of Sustainalytics for external measurement and risk management
- Belief that ESG factors play an important part in financial sustainability of investments

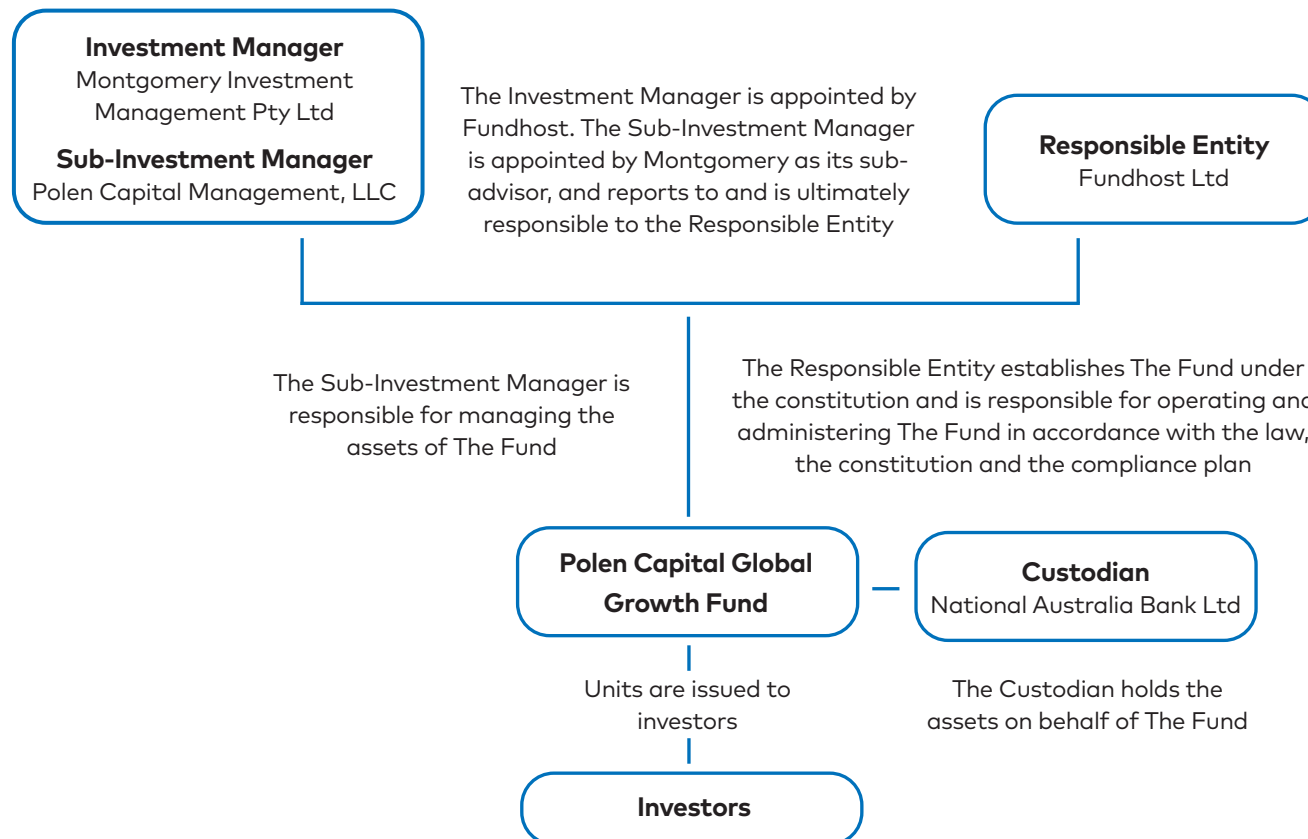
## Corporate Governance

Under the Australian Corporations Act and The Fund documents, investors are provided with several layers of independent oversight providing a robust and appropriate corporate governance structure. The structure provides additional investor safeguards through the separation of duties, specialisation of expertise, clear lines of

responsibility and layered approval processes.

The Fund is operated and administered by a responsible entity (Fundhost) that holds an appropriate AFSL. Fundhost has appointed NAB as the independent custodian to hold the assets of The Fund.

The following diagram summarises the management and governance structure of The Fund.





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## Clear Legal Rights

The constitution establishes The Fund and sets out the rules. Together with the PDS and the law from time to time, it governs your relationship with Fundhost and provides you with your (and our) legal rights.

The constitution gives Fundhost rights to be paid fees and expenses and to be indemnified from The Fund. It governs (amongst other things) Fundhost's powers, (which are very broad), investor meetings and unit issue, pricing and withdrawal, as well as what happens if The Fund terminates.

The constitution limits Fundhost's need to compensate you if things go wrong. Generally, subject always to liability which the Corporations Act imposes, Fundhost is not liable in equity, contract, tort or otherwise to investors for any loss suffered in any way relating to The Fund.

The constitution also contains a provision that it alone is the source of the relationship between you and Fundhost and not any other laws (except, of course, those laws that cannot be excluded).

Fundhost must have investor approval to make changes to the constitution that are adverse to the rights of investors.

You can obtain a free copy of The Fund's constitution by calling Fundhost.

# Part C

## Risks of Managed Investment Schemes

### Significant Risks

In addition to the significant risks described in the PDS, the following risks may impact your investment and generally impact managed investment schemes:

- **Cyber Risk:** There is a risk of fraud, data loss, business disruption or damage to the information of The Fund or to investors' personal information as a result of a threat or failure to protect the information or personal data stored within the IT systems and networks of the responsible entity or other service providers.
- **Investment Manager Risk:** Investment managers can be wound up or liquidated, they can cease to manage The Fund and be replaced, their investment methodology can change, they can poorly manage operational risks and their funds can perform poorly. If any of these events occurred in respect of Polen Capital, Fundhost and Montgomery would do all things reasonably practicable to recover the value of The Fund's investments and seek a new investment manager or program, with a similar investment profile if thought appropriate. If the investment program changed significantly, you would be given at least 30 days' notice where practicable.
- **Multi-Classes:** The Fund offers separate classes of units for investment. The classes are not separate legal entities and the assets of each class will not be segregated. All of the assets of The Fund are available to meet all of its liabilities, regardless of the class to which such assets or liabilities are attributable. In practice, cross-class liability will usually only arise where any

separate class becomes insolvent and is unable to meet all of its liabilities. In this case, all of the assets of The Fund attributable to other separate classes may be applied to cover the liabilities of the insolvent classes. If losses or liabilities are sustained by a class in excess of the assets attributable to such class, such excess may be apportioned to the other classes.

### Risks in General

#### About risk and return

All investments are subject to varying risks and the value of your investment can decrease as well as increase (i.e. you can experience investment gains or investment losses).

Investment returns are affected by many factors including market volatility, interest rates and economic cycles. Changes in value can be significant and they can happen quickly.

Different types of investments perform differently at different times and have different risk characteristics and volatility.

These are some of the reasons why you should consider investing in several different types of investments (often called diversification).

The significant risks associated with investing in this Fund are discussed in the PDS. We cannot eliminate all risks and cannot promise that the ways they are managed will always be successful. However, the Polen Capital process is an important step in managing many of these risks.

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The performance of The Fund will be influenced by many factors, some of which are outside the control of Fundhost, Montgomery and Polen Capital.

If these risks materialise, your distributions may be lower than expected or there may be none. The value of your investment could fall and you could lose money.

#### **Ways to manage your risk**

You can help manage your own risks too. You can:

- know your investment goals and your risk tolerance
- understand risk and return and be comfortable that an investment may not give you the outcomes you hope for
- diversify your investments (that is, don't invest all your monies in The Fund)
- invest for at least the recommended timeframe
- keep track of your investment and
- speak with a financial adviser and make sure The Fund is the right investment for you.

#### **Risk management**

Depending on the type of investments a fund chooses to focus on, your decision to invest in one or perhaps more managed funds can be a good way to help better manage the impact of risk on your investments. Spreading risk often reduces the highs and lows of investment performance and helps reduce the impact on you of one or more types of investments performing poorly.

# Part D

## How We Invest Your Money

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### **Investment Philosophy**

Polen Capital believes that consistent earnings growth is the primary driver of intrinsic value growth and long-term stock price appreciation. Accordingly, efforts focus on identifying and investing in a concentrated portfolio of high-quality growth companies that can deliver sustainable, above average earnings growth.

Polen Capital invests in companies that have durable earnings profiles driven by sustainable competitive advantages, superior financial strength, proven management teams and leading products or services. Polen Capital believes such exceptional companies not only have the potential to contribute to outsized returns to the portfolio, but are also inherently less risky, as their greater earnings stability and financial strength offer a "margin of safety" that typically results in less volatility during declining markets.

Polen Capital believes that investing in a select portfolio of 25 to 35 companies allows for greater return potential as winners can have a more substantial impact on the portfolio. Polen Capital is not interested in diversification just for the sake of doing so, particularly if it in any way compromises the quality of the portfolio.

Finally, Polen Capital adopts a business owner's mindset and thus invests on a long-term time horizon with the belief that clients will best benefit from steady compounding returns generated by the portfolio companies. Over the long-term, Polen Capital believes the earnings growth of the portfolio companies can drive double-digit annualised returns.

# The Polen Capital Investment Process

## 4: Portfolio Construction & Management

- Construct portfolio of competitively advantaged growth businesses
- Utilise unemotional selling-absolute return mentality

25-35  
Portfolio Holdings

## 3: Iterative Deep Dive Research

- Assess industry dynamics and growth
- Identify company-specific competitive advantages
- Evaluate competitive dynamics/potential changes
- Valuation work based on free cash flow
- Examine/interview management based on track record
- Identify pre-mortem
- ESG analysis/review

100-150  
Coverage Universe

## 2: Initial Research Project

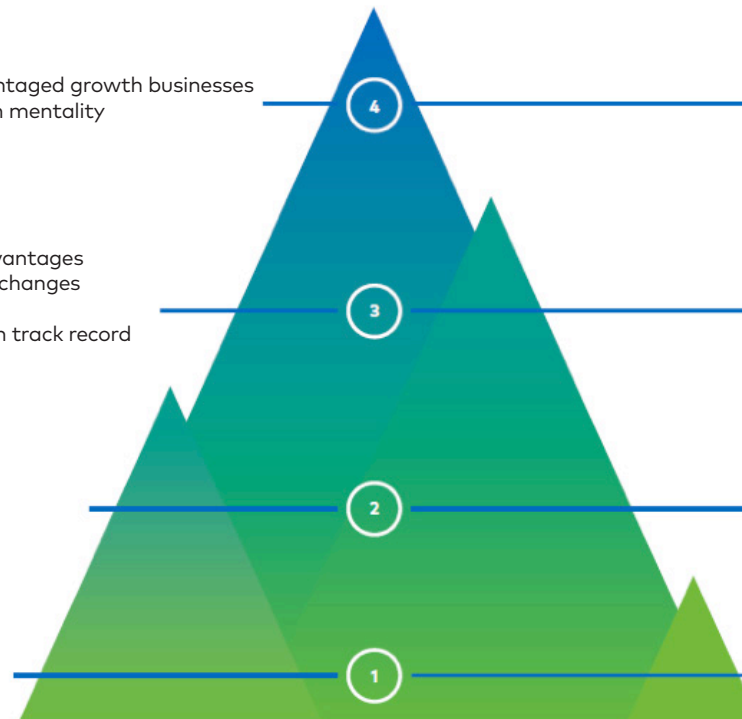
- Test sustainability of strong financials
- Determine cyclical influence on financials
- Rule out fad/fashion impacts

350  
Candidates

## 1: Apply Guardrails

- Return on equity above 20% sustained
- Exceptionally strong balance sheet
- Stable or growing profit margins
- Abundant free cash flow

3,000  
Stock Universe



## 1. Apply Guardrails

Polen Capital uses independent research to screen and identify investment candidates and build a concentrated and high-conviction portfolio of high-quality, durable, and in the view of the portfolio managers, lower risk businesses. The same financial and qualitative criteria, or guardrails, are ingrained into the Polen Capital process. The guardrails comprise attractive returns on investment capital; exceptionally strong balance sheet; healthy profit margins; abundant free cash flow; and real organic revenue growth. By applying these guardrails consistently, regardless of where the company is based or the industry in which the company competes, Polen Capital finds this screen effectively shrinks the investable universe from several thousand listed stocks to 100-150 investment candidates, making the investment process relatively efficient.

## 2. Initial Research Project

Following the initial screening, Polen Capital conducts further research to determine whether historically strong financials are likely to be sustainable, to identify any cyclical influences on a business' finances and to eliminate or allow for impacts that are temporarily inflating financial strength in a way that is not sustainable.

As well as delivering consistency and transparency to the investment process, Polen Capital's financial guardrails build in a strong bias toward businesses with organic growth at stable to increasing margins, little or no debt, high conversion of accounting earnings to cash flow and sustainably high returns on capital. Businesses that employ financial engineering to enhance growth, as well as those that

employ meaningful amounts of debt relative to cash flow, are likely to fall outside the guardrails. Many companies classified in sectors such as financials, industrials, energy, materials, utilities and real estate tend to be eliminated from the portfolio.

## 3. Iterative Deep Dive Research

Polen Capital's experience is that between 100 and 150 businesses globally generally make it through both the financial screen and initial research. After the initial research project has been completed, an investment candidate is presented for peer review, discussion of risks and to identify areas for further research. Most of the team's time and energy is then spent on the iterative deep-dive research of these investment candidates. The goal is to gain a thorough understanding of each business, its margin of safety, growth prospects, competitive moat, industry dynamics and management track record. Part of the iterative deep-dive research is a pre-mortem risk analysis where the team imagines that an investment has failed and then works backward to determine what potentially led to that failure.

The team also analyses any ESG-related (ESG refers to environmental, social and governance) risks. This deep-dive research involves a thorough examination of filings, news releases, management presentations, earnings announcements and related conference calls, and any other relevant public information. The analysis may also occasionally include a review of relevant external sell-side research reports, or at times an on-site visit to the company being researched.

Polen Capital's deep-dive iterative process typically continues for months even though most of the businesses studied are rejected and do not ultimately enter the portfolios. Sometimes Polen Capital finds that a competitive advantage that has sustained a business in the past is changing and may not be sufficient in the future, or a company is facing growth or structural challenges. Once an idea has been thoroughly vetted and a formal recommendation to purchase a business has been made, the final steps in the process are taken by the portfolio managers. These steps include an estimate of expected return from an investment candidate over the anticipated holding period of five years.

Polen Capital's investment guardrails limit portfolio holdings and any candidates for investment to those viewed as more sustainable and predictable businesses. Earnings estimates are based on conservative assumptions and are cash-adjusted to improve comparability and overcome the complexity of different accounting systems. Expected return calculations also factor in the return of capital to shareholders (dividends or share buybacks), provided they are funded with excess cash flow beyond the company's investment requirements. An investment candidate is generally added to a portfolio only if Polen Capital reasonably expects it to generate a double-digit annualised return over a five-year holding period.

#### **4. Portfolio Construction and Management**

Portfolio construction is intended to further reduce the potential for permanent capital loss by avoiding concentration of unintended risks, including government policy and macroeconomic risks. Polen Capital's sell discipline is a mirror image of the buy discipline, striving for unemotional selling whenever a holding no longer clearly meets the financial or qualitative guardrails.

Once an investment candidate has been included in a portfolio, Polen Capital begins a process of ongoing monitoring and review of the business, and this is designed mainly to identify any changes to an investment case. Companies in the portfolio are subject to continued quantitative screens and fundamental analysis. If a holding no longer meets the investment team's criteria, then a decision is made to sell it irrespective of the market conditions.

Polen Capital believes that long-term thinking concentrates its focus on owning great businesses rather than buying and selling (trading) stocks for the short-term. Additionally, Polen Capital believes that the share prices of the portfolio companies will be driven by the underlying earnings growth of the business over the long-term. This leads to a positive bias, in Polen Capital's opinion, toward relatively predictable businesses that can be estimated with conviction.

Polen Capital seeks to reduce risk – meaning risk of permanent capital loss – by investing in fewer, stronger businesses with competitive and financial strengths including little or no net debt and strong free cash flow generation. Polen Capital does not try to make any market predictions and hence the portfolio is close to fully invested at all times.

## Investing Across the Growth Spectrum

Polen Capital  
Global Growth



Note that this is a sample portfolio of a Global Growth strategy, the actual portfolio of the Polen Capital Global Growth Fund will be different.



Polen Capital does not invest in heavily regulated industries or state-controlled enterprises. Exposure to cyclical and commodity-based industries is minimal. Investment candidates are based on expected absolute returns, rather than relative valuation. Polen Capital generally limits the investment candidates to those expected to achieve a mid-teen (or more) annualised return over the holding period of the investment (noting that returns of course are not guaranteed).

Polen Capital's investment teams are organised with minimum possible hierarchy; individuals are generalists with no specific industry coverage. Polen Capital strives for an open and collaborative performance culture to foster debate and objective, critical thinking. Each team member functions as a research analyst first and foremost. Analysts are incentivised to contribute to the strengths of the team and investment results with the belief that success and compensation will follow the portfolio's success.

Sector allocation is a residual of the stock selection process. Polen Capital typically seeks to limit a portfolio's allocation to a single sector to approximately 50 per cent and a single industry to 25 per cent. The portfolio has historically had minimal exposure to the financial, industrial materials, utilities, telecom, real estate and energy sectors because businesses within these sectors tend to be capital intensive, cyclical and often heavily regulated and do not meet Polen Capital's strict requirements for consistency of earnings, free cash flow growth and steady high returns on invested capital.

Country allocation is also a residual of the stock selection process.

Typically, Polen Capital invests in businesses in at least five countries and often ten or more. As much as possible, Polen Capital invests in larger and more liquid companies. The stocks in the Polen Capital Global Growth Fund have a market capitalisation greater than US\$10 billion.

Each investment is selected with an expected holding period of at least five years. The trailing twelve-month turnover for the Fund's strategy is typically less than 25%.

Polen Capital does not hedge currency risk, and the belief is this would add cost and complexity to the portfolio without materially reducing risk of capital loss. Most investments are in larger capitalisation, multi-national and globally competitive companies that tend to earn revenues in several currencies. Many of these companies are also able to match local currency revenues and expenses or enjoy natural currency hedges or directly hedge currency exposure at the corporate level. Polen Capital's expectations are that currency volatility is unlikely to be a material source of risk or return in the portfolio over a typical holding period.

Polen Capital utilises a model portfolio structure for all accounts to manage performance dispersion. Additionally, the CEO and portfolio managers review sector exposures and portfolio attribution on a continuous basis.

Finally, the Polen Capital culture is driven by the core purpose of protecting and growing clients' investment over the long term. Polen Capital is committed to honesty, integrity and ethical practices in all aspects of its business, and believes that integrating ESG considerations into its day-to-day operations and business decisions is a fundamental part of that commitment.

## Polen Capital believes ESG integration delivers results

	Polen Capital Global Growth Fund <sup>1</sup>
<b>Morningstar Sustainability Rating</b>	High
<b>Rank in Category</b>	5th percentile (6,775 funds in category)
<b>Morningstar Sustainability Score</b>	19.6 (out of 100, lower is better)

Source: Morningstar. Sustainability Score and Sustainability Rating as of 30 November 2020. Scores and ratings may be different for The Fund. Sustainalytics provides company-level ESG Risk analysis used in the calculation of Morningstar's Sustainability Score.

<sup>1</sup> Rating and score are based on the portfolio of the Polen Global Growth Fund (PGIIX), which may not be identical to the Polen Capital Global Growth Fund portfolio.

### ESG Integration

Polen Capital embeds ESG analysis into its comprehensive review of a company. It strives to gain a thorough understanding of the business model, its margin of safety, growth prospects, competitive moat, industry dynamics and management track record. ESG analysis is focused on the issues that Polen Capital believes will affect the company's long-term sustainability and ability to deliver value to stakeholders.

Extensive internal research is supplemented with the company ESG ratings and research from Sustainalytics, a third party ESG data provider which measures a company's exposure and management of ESG risks. Sustainalytics is used as a risk management tool to ensure Polen Capital has fully accounted for potential ESG risks.

Assessing ESG factors is essential to Polen Capital's analysis of a company's financial sustainability, ability to maintain its competitive advantage and drive growth over the long-term. Financial sustainability and the management of ESG issues are intertwined, and Polen Capital thoroughly reviews how ESG factors present risk or opportunity to the company. Polen Capital seeks high-quality companies that are prioritising sustainability throughout their business to enhance value for all stakeholders. The focus on ESG factors and their impact on sustainability continues throughout engagement with company management and in proxy voting.

Within its investment process, Polen Capital evaluates any issue—environmental, social, governance, or other—that could significantly impact a business's long-term sustainability or value to stakeholders. Among the governance issues it assesses, it seeks companies with high quality, properly incentivised management teams and independent, diversified boards. Polen Capital believes this company structure lends to alignment of the company with shareholder interests and greater accountability. Social is thought of as the value the company creates for its stakeholders, such as its employees, customers, shareholders, and partners. Polen Capital observes how the working environment the company cultivates for its employees and the experience it offers its customers often builds loyalty and retention that can strengthen the brand. Polen Capital considers a company's environmental practices, such as improved energy or water efficiencies, when it views these as material to the company's long-term sustainability. Polen Capital focuses on the value the company realises from these measures, such as improved operational margins or an enhanced brand.

## Risk Management

Risk is defined as permanent loss of capital. Risk mitigation is ingrained in the Polen Capital process.

<b>Business Risk</b>	<ul style="list-style-type: none"><li>• Independent research: knowing the Fund's investments well</li><li>• Exclusive focus on high-quality businesses</li></ul>
<b>Financial Risk</b>	<ul style="list-style-type: none"><li>• "Fortress" balance sheets</li><li>• Low or no debt, self-funding and recurring cash flow</li></ul>
<b>Policy Risk</b>	<ul style="list-style-type: none"><li>• No high-risk domiciles</li><li>• No highly regulated industries</li><li>• Large cap/multinational bias</li></ul>
<b>Macro Risk</b>	<ul style="list-style-type: none"><li>• Low exposure to cyclical businesses</li><li>• Secular growth, repeat revenues and cash flow businesses</li></ul>
<b>Market Risk</b>	<ul style="list-style-type: none"><li>• Long-term holdings</li><li>• Expected return: avoid paying the wrong price for the right business</li></ul>
<b>Currency Risk</b>	<ul style="list-style-type: none"><li>• Diversification by currency</li><li>• Global/multinational bias</li></ul>

Polen Capital's Risk & Compliance Committee oversees and approves firm-wide risk management practices and aims to ensure compliance policies and procedures are properly observed throughout the firm and that risks across the firm are identified and mitigated.

Polen Capital continuously seeks to identify, monitor, manage, and mitigate risk across the business. The Risk & Compliance Committee oversees and approves firm-wide risk management practices and ensures the following:

- Comprehensive identification and assessment of risks that the firm faces and has established a risk management infrastructure capable of addressing those risks,
- Coordination with the firm's other governance committees to monitor applicable risks such as strategic, financial, credit, market, liquidity, security, property, IT, legal, regulatory, reputational, and other risks,
- Clear articulation of risk-related responsibilities and corresponding allocation to the proper departments for mitigation, and performance of a gap analysis to ensure the oversight of any risks is not missed, and
- Establishment and approval of an enterprise-wide risk management framework, in conjunction with other firm-wide governance committees.

### **Risk Management Philosophy**

The risk management philosophy was developed by Polen Capital's founder, David Polen. The philosophy stems from the concept of a "margin of safety" described in *The Intelligent Investor*, by Benjamin Graham. In essence, Polen Capital applies the margin of safety to

growth companies and believes the margin of safety is in the quality of the businesses and that real risk is the permanent impairment of capital.

Polen Capital primarily seeks to control risk at the individual security level. As bottom-up stock pickers, candidate companies are evaluated on an individual basis. Polen Capital looks to identify 25 to 35 high-quality growth franchises with a holding period of at least five years. As such, the most important consideration to determine is the minimal probability for permanent capital loss. If Polen Capital does not have complete conviction in this, then the company will not be considered as a candidate for the portfolio, no matter how compelling its growth prospects. By raising the bar so high, only investing in businesses Polen Capital believes to be great (meaning those characterised by high return on equity, strong free cash flow and solid balance sheets) and limiting the number of holdings, Polen Capital believe they have limited the risk in the portfolio.

Polen Capital have risk controls built into the portfolio construction process by limiting investments to a maximum of 10 per cent for an individual holding, 50 per cent for any single sector and 25 per cent for any individual industry.

The Polen Capital Global Growth portfolio has historically had low or no exposure to the financial, industrial materials, utilities, telecom, real estate and energy sectors because the companies within these sectors tend to be capital intensive, cyclical and often heavily regulated businesses that do not meet our strict requirements on consistency of earnings, free cash flow growth and steady high returns on invested capital.

For more information on the risks associated with The Fund please refer to "Risks of managed investment schemes" in the PDS.

# Part E

## Fees and Costs

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### **Additional explanation of fees and costs**

#### **Can fees be different for different investors?**

No, we do not generally negotiate fees.

#### **What are the costs of investing and withdrawing from The Fund?**

We have a documented policy in relation to the guidelines and relevant factors taken into account when calculating unit prices. We call this our unit pricing policy. We keep records of any decisions which are outside the scope of the unit pricing policy, or inconsistent with it. A copy of the unit pricing policy and records is available free on request.

#### **Government charges and taxation**

Government taxes such as GST will be applied to your account as appropriate. In addition to the fees and costs described in the PDS, standard government fees, duties and bank charges may also apply such as stamp duties. Some of these charges may include additional GST and will apply to your investments and withdrawals as appropriate.

The fees outlined in the PDS take into account any GST net of reduced input tax credits which may be available.

# Part F

## How Managed Investment Schemes are Taxed

### Paying Tax

In all likelihood you will need to pay tax in relation to your investment in this Fund. Generally you will pay income or capital gains tax, but you might be able to claim some tax credits or have the benefits of some concessions.

Your tax liability ultimately depends on your circumstances, for example, whether you are an Australian resident. So it is important that you seek professional advice before you invest or deal with your investment.

We will send you the information you need each year to help you to complete your tax return.

We will distribute income and capital gains, if any, shortly after 30 June each year. Distributions could comprise:

- income (like dividends and interest)
- net taxable capital gains (from the sale of The Fund's investments) and
- tax credits (like franking credits attached to dividend income and credits for tax paid on foreign income).

Additionally, Australian residents are generally subject to capital gains tax on gains when they withdraw any money or transfer units.

Depending on the kind of taxpayer you are, and how long you have held your units, you may be entitled to a capital gains concession which can reduce the liability by up to one half.

If you choose not to provide us with your Tax File Number (**TFN**) or Australian business number (**ABN**) and don't have an exemption, we must deduct tax at the highest personal rate, plus the Medicare levy, before passing on any distribution to you. The law is very strict on how we can use these details.

Fundhost may elect to operate The Fund under the Attribution Managed Investment Trust (**AMIT**) regime. As an AMIT the Fund can attribute amounts of income and tax offsets to investors on a fair and reasonable basis. There is also an ability to adjust the cost base of an investor's interest in The Fund upwards or downwards.

# Part G

## More Information

### Cooling Off

We are allowed to (and generally do) make adjustments for market movements up or down, as well as any tax and reasonable transaction and administration costs. For example, if you invest \$50,000 and the value of the units falls by 1% between the time you invest and the time we receive notification that you wish to withdraw your investment, we may charge you on account of the reduced unit value and you would incur a buy spread of +0.25% and a sell spread of -0.25%. This means that \$49,253 would be transferred from The Fund back to you.

### Privacy

We collect and use personal information about you to administer your investment and also to conduct research.

By applying for units in The Fund you consent and agree to information about you being obtained and used by us. Fundhost will collect and use your information in accordance with our Privacy Policy, a copy of which is available free of charge.

If you fail to provide us with the required information or if you provide us with incomplete or inaccurate information Fundhost may not be able to provide you with the products or services you are seeking within the time periods contemplated in the PDS.

Your information will not be disclosed unless:

- the law requires
- your financial adviser needs the information

- it is in keeping with our Privacy Policy and may be provided to external service providers including The Fund's investment manager, custodian, auditors, taxation and legal advisers and information technology consultants or
- Fundhost needs to send you promotional material. If you don't want this, contact Fundhost anytime.

Fundhost will disclose information if required by law to do so (including under the AML CTF Act and taxation legislation).

If you think any of the details that Fundhost holds are wrong or out of date contact Fundhost and we will correct the details. You can always access the personal information held about you by contacting Fundhost on +61 (0)2 8223 5400.

### Anti-Money Laundering

In order to meet our obligations under the AML CTF Act or other applicable taxation or reporting legislation, we may require further information from you as to identity, the source of your funds and similar matters.

Fundhost is required to verify that information by sighting appropriate documentation.

Records of the information obtained will be kept and may be required by law to be disclosed. Otherwise the information will be kept confidential.

By applying for units in The Fund, you also agree that Fundhost may in its absolute discretion determine not to issue units to you, may cancel units which have been issued to you or may redeem any units issued to you if Fundhost believes such action to be necessary or desirable in light of its obligations under the AML CTF Act or related legislation and Fundhost will not be liable to you for any resulting loss.

## Information for New Zealand Investors

Units in The Fund offered under the PDS and this Information Booklet (which forms part of the PDS) are offered to New Zealand as well as Australian investors.

### New Zealand Investors's Warning Statement

This offer to New Zealand investors is a regulated offer made under Australian and New Zealand law. In Australia, this is Chapter 8 of the Corporations Act 2001 (Aust) and regulations made under that Act. In New Zealand, this is subpart 6 of Part 9 of the Financial Markets Conduct Act 2013 and Part 9 of the Financial Markets Conduct Regulations 2014.

This offer and the content of the offer document are principally governed by Australian rather than New Zealand law. In the main, the Corporations Act 2001 (Aust) and the regulations made under that Act set out how the offer must be made.

There are differences in how financial products are regulated under Australian law. For example, the disclosure of fees for managed investment schemes is different under the Australian regime.

The rights, remedies, and compensation arrangements available to New Zealand investors in Australian financial products may differ from the rights, remedies, and compensation arrangements for New Zealand financial products.

Both the Australian and New Zealand financial markets regulators have enforcement responsibilities in relation to this offer. If you need to make a complaint about this offer, please contact the Financial Markets Authority, New Zealand (<http://www.fma.govt.nz>). The Australian and New Zealand regulators will work together to settle your complaint.

The taxation treatment of Australian financial products is not the same as for New Zealand financial products.

If you are uncertain about whether this investment is appropriate for you, you should seek the advice of a financial advice provider.

The offer may involve a currency exchange risk. The currency for the financial products is not New Zealand dollars. The value of the financial products will go up or down according to changes in the exchange rate between that currency and New Zealand dollars. These changes may be significant.

If you expect the financial products to pay any amounts in a currency that is not New Zealand dollars, you may incur significant fees in having the funds credited to a bank account in New Zealand in New Zealand dollars.

The dispute resolution process described in this offer document is available only in Australia and is not available in New Zealand.

**The above statements are required pursuant to New Zealand's financial markets legislation. If you credit NZ dollars to Fundhost's application account you may incur an unfavourable currency conversion rate and you will also have to pay any applicable fees. You can avoid these fees by only crediting Australian dollars.**



### **New Zealand disclosures relating to distribution reinvestment**

Distributions from The Fund will be automatically reinvested resulting in additional units being issued to you, unless you tell us otherwise.

Units issued as part of a distribution will be allotted in accordance with the terms and conditions set out in the constitution of The Fund and the offer document (comprised of the PDS and this Information Booklet which forms part of the PDS).

The allotment of units as part of a distribution described in the offer document is offered to New Zealand investors on the following basis:

- At the time the price of the units allotted as part of a distribution reinvestment is set, we will not have any information that is not publicly available that would, or would be likely to, have a material adverse effect on the realisable price of the units if the information were publicly available.
- The right to acquire, or require us to issue, units as part of a distribution reinvestment will be offered to all investors in The Fund of the same class, other than those who are resident outside New Zealand and who are excluded by us so as to avoid breaching overseas laws.
- Every investor to whom the right is offered will be given a reasonable opportunity to accept it.
- Units will be issued or transferred on the terms disclosed to you in the offer document, and will be subject to the same rights as units issued or transferred to all investors of the same class as you who agree to receive the units.

You have the right to receive from us, on request and free of charge, a copy of:

- the most recent annual report of The Fund (if any)
- the most recent financial statements of The Fund and, if those statements are not audited or reviewed by an auditor, a statement to that effect
- a copy of the auditor's report on those statements (if any)
- the current offer document (comprised of the PDS and this Information Booklet which forms part of the PDS)
- the constitution of The Fund and any amendments to it.

Copies may be obtained electronically at [www.fundhost.com.au](http://www.fundhost.com.au) or by emailing [admin@fundhost.com.au](mailto:admin@fundhost.com.au).

Within 30 days of the day on which the units in The Fund are allotted to you, you will be sent a statement of the amount of the distribution and the number of units that have been allotted to you.



## Responsible Entity

### Fundhost

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## Investment Manager

### Montgomery (Sub-investment Manager)

### Polen Capital (Investment Manager)

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