

Analysts: Leanne Fook; James Gunn

Products Facts

Manager	Investors Mutual Limited	Fund type	Wholesale	Boutique	Yes
APIR code	IML0006AU	Specialisation	Value	Multimanager	No
Fund status	Open	Peer group	Australian Equities - Small Cap	Inception date	Feb. 1, 2007
Min. investment (A\$)	500000			ICR (% pa)	1.13

Standard & Poor's View

S&P rates this fund three stars, reflecting our conviction that the manager will consistently generate risk-adjusted returns in-line with both its relevant investment objectives and its peers.

S&P has upgraded the rating of this fund from two stars to three stars. The previous rating reflected S&P's concerns about instability in the investment team due to high staff turnover, and about the capacity of the manager to make full use of analysts' input in the investment process. Investors Mutual Ltd. (IML) has replaced lost staff, albeit with analysts who have less direct experience of funds-management. It has also introduced a new equity scheme to retain staff.

There is a high level of experience in the management of IML's small-cap portfolios. Simon Conn continues his role as portfolio manager for these funds, bringing a strong element of continuity to the product. Unfortunately, the earlier staff departures did affect the small-cap products because two of the departing analysts were small-cap specialists, and the team was restructured in 2008 to support the portfolio managers across both the large- and small-cap products. We note that the new analysts are less experienced than their predecessors, but we consider they have the appropriate background and experience.

S&P has noted that boutique managers often need to ensure that their founders contribute to the investment process because they are usually the most experienced members of the investment team, while also allowing the best ideas from other team members to be incorporated in portfolios and encouraging a culture of healthy debate. If this balance cannot be maintained, the process can become dominated by a single strong personality. S&P believes this contributed to past staff dissatisfaction and acknowledges that IML management has attempted to address the problem.

Product Features

IML's second small-cap offering, the IML Small Cap Fund, was made available in early 2007. It was launched in response to the increase in the size of the market, which has seen IML's market share decline since closure of the original small-cap product in 2002.

The key difference between the two products is that up to 25% of this fund may be invested in the New Zealand market, and in securities included in the S&P/ASX 50 Index.

The fund will typically invest in 20-70 stocks and the cash allocation is limited to 20%. The manager has been prepared to go to cash in markets where it considers there to be few value-driven opportunities.

Historically, the portfolio has held underweight exposures to the energy and materials sectors, and overweight exposures to the industrials and consumer discretionary sectors.

There is a management fee of 1.1275% per year. In addition, a performance fee of 10.25% applies to returns above the S&P/ASX Small Ordinaries Accumulation Index + 2% per year.

Fund Objectives

Benchmark	S&P/ASX Small Ordinaries Accum Index
Target return (% p.a.)	Outperform benchmark over 4 year rolling periods

Investment Style

IML manages the fund using a conservative, value-investment approach. Although it benchmarks to the S&P/ASX Small Ordinaries Accumulation Index, capital preservation is a key tenet of the IML approach. Stock selection focuses on identifying good-quality companies at appropriate valuations. Highly-leveraged, and cyclical stocks typically will have underweight exposures to the benchmark, or be excluded.

Passive						Active
Value						Growth
Small Cap						Large Cap

Investment Team

Previously, S&P noted its concerns about significant instability in the IML investment team with its high level of staff turnover. S&P was also concerned about the ability of the manager to make full use of the analyst team's inputs in the investment process. IML has replaced lost staff, albeit with analysts who have less direct experience in funds management. It has also introduced a new equity scheme to retain staff.

Anton Tagliaferro is the founder of IML and has over 20 years' experience managing value portfolios. Mr. Conn is responsible for the overall management of the IML small-cap funds. Mr. Conn has 14 years' investment experience, 10 of which have been with IML. In addition to Mr. Tagliaferro and Mr. Conn, the team includes one portfolio manager (who also has analytical responsibilities), five equities analysts, and two quantitative analysts.

Staff retention has been a problem for the team, which has undergone significant change over the past two years. In February 2008, Paul Frost (senior portfolio manager large-caps), and Shaun O'Malley (equity analyst) left IML and were replaced by Chris Prunty and Mark Wade. Mr. Prunty is currently dedicated to small-cap research. Mr. Wade is

participating in IML's newly introduced rotational trainee program and is also working with Mr. Conn on small-cap stocks. In June 2008, another three investment team members resigned: equities analysts, Peter Moller and Tony Waters; and research/quantitative analyst Vessela Tasker.

Mr. Conn has extensive experience analysing small-cap stocks and has been the portfolio manager responsible for IML's small-cap products since 2003. This experience provides a strong element of continuity in the management of the small-cap portfolios. However, the loss of Mr. Moller and Mr. Waters was significant because both had strong small-cap backgrounds and were actively involved in supporting these products.

Following the second round of departures, Julian Beaumont and Robert Bishop joined the team as equity analysts, in addition to two quantitative analysts, Andrew Harrison and Paul Winter. Mr. Harrison has an extensive background in quantitative funds-management and trading systems. He has joined IML on a part-time basis and is largely involved in developing IML's trading systems. He has minimal influence on portfolios.

The two new fundamental analysts have sell-side and investment-banking backgrounds, but IML is their first experience of funds management. S&P considers that these analysts have the appropriate skills but there will be a period of adjustment as they gain experience on the "buy" side.

The investment team is structured to support the portfolio managers across both the large- and small-cap products. Previously, IML assigned responsibilities to analysts based on a company's market capitalisation, and there were distinct large- and small-cap teams. The relative inexperience of the new analysts may mean that it takes some time to build up the same level of knowledge as the previous team. A positive development is that one of the new analysts, Mr. Bishop, has a solid technical background in the resources industry, which, historically, is a sector that IML has largely avoided.

Analysts' remuneration comprises: a base salary, a short-term incentive plan linked directly to analysts' model portfolios, a profit-share arrangement, and a recently introduced equity plan in non-voting shares. S&P believes that these measures should assist in improving staff retention.

New					Experienced
Small					Large
Unstable					Stable

Investment Process

The investment process is straight forward and appropriate for a manager with this bottom-up, value philosophy. The manager screens the entire ASX universe using liquidity and quality filters to reduce the investable universe to approximately 350 stocks. It then ranks the investable universe by sector and by value to identify stocks for further in-depth analysis.

Analysts undertake a five-step assessment of a company that includes segmental analysis, company contact, research reports, valuations, and the setting of price targets. The manager requires analysts to indicate a confidence ranking that describes their level of conviction in the company's future earnings.

Companies identified as attractive are then considered for inclusion in the portfolio. The portfolio-construction process is designed to skew the fund in favour of those stocks that IML considers to be the most undervalued or those in which the analysts have the highest conviction. There are a series of portfolio construction guidelines in place to ensure adequate diversification.

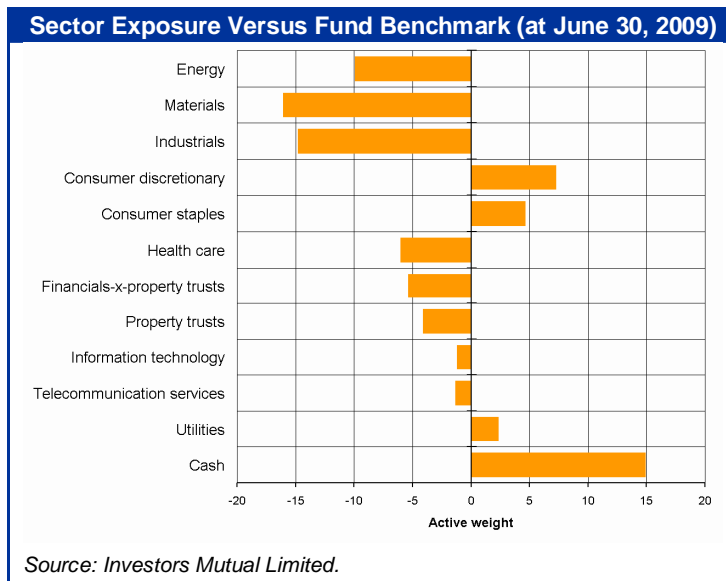
Performance

The fund aims to outperform the S&P/ASX Small Ordinaries Accumulation Index over rolling four-year periods.

This product was launched in early 2007 and therefore has a short track record. Over the two years to June 30, 2009, the fund returned -14.2% (after fees), outperforming its benchmark by 10.4% per year. The fund also outperformed its benchmark over one year.

Performance Measures	
Average portfolio turnover (%)	40
Typical number of stocks in portfolio	20-70

Source: Investors Mutual Limited.



Risk Management

There are two elements to risk management for the fund: a conservative investment philosophy and focus on capital preservation, and a series of portfolio-construction guidelines that aim to ensure adequate diversification.

The portfolio will typically hold between 20 and 70 stocks. Portfolio construction guidelines include stock, sector, and size limits. Derivatives are used only in the management of portfolio risk and cash flows, with no gearing permitted. The portfolio's cash allocation is limited to 20%.

Management Group Profile

Mr. Tagliaferro established IML as a specialist Australian-equities manager in May 1998. The current ownership structure has been in place since Jan. 1, 2009, when a new class of non-voting shares was

issued as part of a revised staff-equity plan. Treasury Group owns 47.5% of the business and Mr. Tagliaferro and key staff own the balance. Key investment staff own about 10% of the business.

Market Share

At Aug. 31, 2009, IML had A\$3.36 billion in funds under management (FUM). It continues to have a strong focus on servicing its retail investor base.

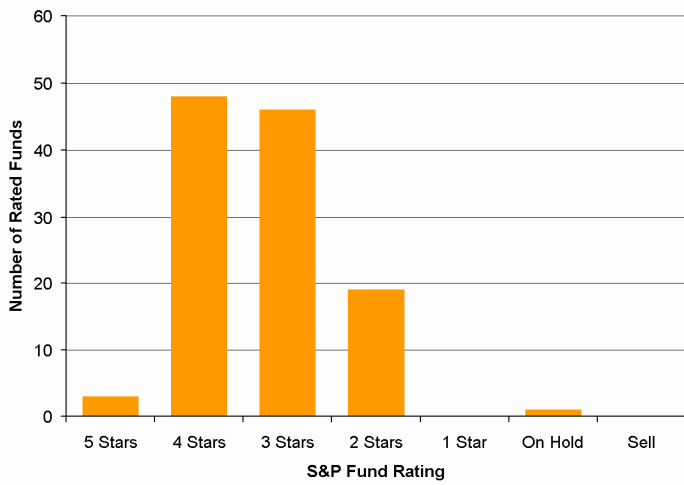
Analysis by the manager indicates that at current FUM levels, capacity is not a consideration.

Analyst(s): Leanne Fook; James Gunn.

Release authorised by: Leanne Milton.

S&P Fund Rating Reference Information

Australian Equities - Small Cap (at Oct. 22, 2009)



Reference Material

Sector Reports

www.standardandpoors.com.au/funds

Reader's Roadmap

www.standardandpoors.com.au/funds

Glossary

www.standardandpoors.com.au/funds

Guide to S&P Qualitative Fund Ratings

www.standardandpoors.com.au/funds

Fund Rating Team Biographies

www.standardandpoors.com.au/funds

Fund Rating Peer Groups by Sector

Australian Equities	International Equities	International Fixed Interest	Alternative Assets
Large Cap Diversified	Diversified Equities	Diversified Fixed Interest	Commodities
Large Cap Income	Emerging Markets	Diversified Fixed Interest Income	Multi-Sector
Large Cap Indexed	Emerging Markets Asia ex Japan	Fixed Interest	Private Equity Listed
Large Cap Industrials	Emerging Markets China	Fixed Interest High Yield	Private Equity Unlisted
Long Short	Emerging Markets India	Fixed Interest Income	Infrastructure Listed
Small Cap	Large Cap Diversified	Mortgages	Infrastructure Unlisted
Specialist	Large Cap Income	Mortgages High Yield	Alternative Strategies
Australian Fixed Interest	Large Cap Indexed	Mortgages High Yield Hybrid	Single Strategy Funds Multimanager
Cash	Large Cap Industrials	Mortgages Conventional	Single Strategy Funds Single Manager
Cash Enhanced	Long Short	Mortgages Hybrid	Multi-Strategy Funds Multimanager
Fixed Interest	Long Short Specialist	International Property	Multi-Strategy Funds Single Manager
Fixed Interest Income	Long Short Regional	Direct Commercial	Multi-sector
Mortgages	Regional Japan	Direct Development	Capital Guaranteed
Mortgages High Yield	Regional UK/Europe	Direct Diversified Direct	20
Mortgages Conventional	Regional US	Direct Industrial	40
Mortgages High Yield Hybrid	Regional Asia	Direct Residential	60
Mortgages Hybrid	Small Cap	Direct Retail	80
Australian Property	Specialist Healthcare	Direct Rural	100
Direct Commercial	Specialist Information Technology	Direct Specialised	Equity
Direct Development	Specialist Resources	Diversified Property	Other
Direct Diversified Direct		Listed	
Direct Industrial			
Direct Residential			
Direct Retail			
Direct Rural			
Direct Specialised			
Diversified Fixed Interest Listed			








Fund Rating Philosophy

A star rating is a forward-looking qualitative assessment of a manager's ability to consistently generate risk-adjusted fund returns (net of fees) in excess of both its relevant investment objectives and its peers.

Fund Rating Process

In assigning a star rating to a fund, Standard & Poor's evaluates: the size, skill, and stability of the manager's investment team; the clarity, implementation, and risk management of the investment process; the fund's objectives, fee structure, and portfolio characteristics; and the manager's business management.

Fund Rating Definitions

	Standard & Poor's has very high conviction that the manager will consistently generate risk-adjusted fund returns in excess of its relevant investment objectives and relative to its peers.
	Standard & Poor's has high conviction that the manager will consistently generate risk-adjusted fund returns in excess of its relevant investment objectives and relative to its peers.
	Standard & Poor's has conviction that the manager will generate risk-adjusted fund returns in-line with its relevant investment objectives and relative to its peers.
	Standard & Poor's has conviction that the manager will not generate risk-adjusted fund returns in in-line with its relevant investment objectives and relative to its peers.
	Standard & Poor's has high conviction that the manager will not generate risk-adjusted fund returns in-line with its relevant investment objectives and relative to its peers.
	Issues that may affect the fund's management have emerged; and the fund rating is temporarily suspended, pending clarification.
	Significant issues exist that potentially will adversely affect the fund's performance. Investors should consider obtaining advice on switching or redeeming funds.

Fund Rating Subscript

— NEW — The investment process, fund manager, or the fund has a relatively short history, or the analytical team has changed significantly, but a relevant and demonstrable track record is shown on similar funds.

Disclaimer: Standard & Poor's Information Services (Australia) Pty Ltd (ABN 17 096 167 556) (Standard & Poor's) rating and other opinions are and must be construed solely as statements of opinion and not statements of fact or recommendations to purchase, sell or hold any financial product(s). Conclusions, ratings and opinions are reasonably held at the time of completion but subject to change without notice. Standard & Poor's assumes no obligation to update any information following publication. No warranty, express or implied, is given or made by Standard & Poor's as to the accuracy, timeliness, completeness, merchantability or fitness for any particular purpose of any Standard & Poor's rating, opinion or other information and Standard & Poor's will not be liable to any party in contract or tort (including for negligence) or otherwise for any loss or damage arising as a result of any party relying on any such rating, opinion or other information (except in so far as statutory liability cannot be excluded). Any statement of fact is based on information provided to Standard & Poor's by our clients or obtained from sources which Standard & Poor's considers reliable. Standard & Poor's does not perform an audit in connection with any rating and may rely on unaudited information. Because of the possibility of human or mechanical error by our sources, Standard & Poor's or others, Standard & Poor's does not guarantee the accuracy, adequacy, or completeness of any information and is not responsible for any errors or omissions or for the results obtained from the use of such information. Readers should make their own inquiries.

Warning: Past performance is not a reliable indicator of future performance. Any express or implied Standard & Poor's rating or advice is limited to "General Advice" and based solely on consideration of the investment merits of the financial product(s) alone. The information has not been prepared for use by retail investors and has been prepared without taking account of any particular person's financial or investment objectives, financial situation or needs. Before acting on any advice, any person using the advice should consider its appropriateness having regard to their own or their clients' objectives, financial situation and needs. You should obtain a Product Disclosure Statement relating to the product and consider the statement before making any decision or recommendation about whether to acquire the product. Each rating or other opinion must be weighed solely as one factor in any investment decision made by or on behalf of any adviser and any such adviser must accordingly make their own assessment taking into account an individual's particular circumstances.

Disclosure: Analyst Disclosure: Analyst(s) remuneration is not linked to the rating outcome. The Analyst(s) may hold the financial product(s) referred to in a Standard & Poor's rating or other research report but Standard & Poor's considers such holdings not to be sufficiently material to compromise the rating or opinion. Analyst(s) holdings may change at any time. Standard & Poor's Disclosure: In the event of any person subscribing to any rated financial product(s), such subscriptions may result in a Standard & Poor's client receiving a commission, fee or other benefit or advantage. Details of any such benefits can be obtained from your financial adviser. Standard & Poor's itself does not receive any commission. Prior to the assignment of any rating, the fund manager or another Standard & Poor's client agreed to pay Standard & Poor's a fee for the appraisal and rating service rendered. Standard & Poor's assigns ratings using comprehensive and objective criteria. Standard & Poor's fee is not linked to the rating outcome. Costs incurred during the rating process, including travel and accommodation expenses, may be paid for by the fund manager or another Standard & Poor's client to enable onsite reviews. Standard & Poor's does not hold or have a material interest in any rated financial product(s). Standard & Poor's associates may hold rated financial product(s) but detail of these holdings are not known to the Analyst(s).

Standard & Poor's from time-to-time provides fund managers and other clients with investment data, research software, and other financial planning services. Standard & Poor's is a wholly owned member of The McGraw-Hill Companies, Inc, a New York Corporation. The analytic services and products provided by Standard & Poor's and its associates are the result of separate activities in order to preserve the independence and objectivity of each analytic process. Each analytic product or service is based on information received by the analytic group responsible for such product or service. Standard & Poor's and its associates have established policies and procedures to maintain the confidentiality of non-public information received during each analytic process. Standard & Poor's holds an Australian Financial Services Licence Number 258896. Please refer to Standard & Poor's Financial Services Guide for more information at www.fundsinsights.com.au. "S&P" and "Standard & Poor's" are trademarks of The McGraw-Hill Companies, Inc. Copyright 2009 Standard & Poor's Information Services (Australia) Pty Limited. Certain funds data contained herein may be proprietary to Morningstar, Inc.