

Metrics Direct Income Fund

Date: 26 June 2020



Investment Rating Report



Investment Rating: **SUPERIOR**

Product Complexity: **BLUE - Relatively Simple Product**

Fund Details

Investment Manager: Metrics Credit Partners Pty Ltd

Investment Structure: Registered Australian Unit Trust

Wholesale/Retail: Both Retail & Wholesale

Category: Australian Credit

Investment Style: Diversified Australian private corporate credit

Inception: 1 July 2020

Management Fee: Estimated at 0.60% p.a.

Performance Fee: May be payable to sub funds, or waived if target return not achieved.

Responsible Manager/Entity: Evolution Trustees Limited

Investment Objective

The Trust's Investment Objective is to provide monthly cash income, low risk of capital loss and portfolio diversification through its exposure to the MCP Wholesale Investments Trust (Sub-Trust) and the Wholesale Funds, gaining exposure to managed diversified loan portfolios and participating in Australia's bank-dominated corporate loan market. The Trust may not be successful in reaching its objective. While the Manager believes the Trust will be liquid, there may be periods where an investment in the Trust cannot be redeemed.

Review Summary

The Metrics Direct Income Fund (the Trust) is a registered Australian unit trust investing in the Australian corporate loan market through investment in Metrics' wholesale funds. The Trust may also hold units in the listed trust, MCP Master Income Trust (ASX: MXT). The characteristics of the investment are exceptionally low capital volatility, regular monthly income flow, and a significant return margin compared with cash and short-term cash securities.

The experienced management team at Metrics Credit Partners has grown its capability steadily, increasing team size, fund size, and diversification of the funds underlying the Trust.

This is an attractive investment on a risk-return basis offering a well-managed, well-diversified investment in a sub-asset class that would otherwise be difficult to access for non-bank investors.

As the investments of Metrics Direct Income Fund are untraded, this investment may at times be illiquid. Investors should consider this a medium-to-long-term investment.

Investment Rating & Product Complexity Indicator

A SUPERIOR rating indicates the highest level of confidence that the Trust can deliver a risk-adjusted return in line with its investment objectives. The Investment Manager support for this strategy is very experienced and well resourced, with a solid track record.

Designation as a Relatively Simple Product indicates that the Investment Manager will seek to outperform their chosen market sector, in this case the Australian corporate loan market. The investment, equity funded corporate loans, currently has no core leverage.

The strategies used to outperform, while requiring a depth of market experience and due diligence, are completely compatible with normal market practice. This includes the potential conversion of debt to equity in a restructuring, where the strategy is designed to limit capital loss/preserve investor capital.

Metrics Direct Income Fund

Fund Details

Fund Name	Metrics Direct Income Fund
Dominant Strategy	Income generation through diversified investment in Australian corporate credit
Investment Structure	Registered Australian Unit Trust
RE	Evolution Trustees Limited
Custodian	Sandhurst Trustees Limited
Investment Manager	Metrics Credit Partners Pty Ltd; ACN 150 646 996, AFSL 416146
Administrator	MCH Fund Administration Services Pty Ltd; ACN 636 286 970
Unit Registry	Automic Pty Ltd (Automic Group) ACN 152 260 814
KEY FEATURES	DESCRIPTION
Inception	1 July 2020
Geographic Mandate	Australia
Minimum Application	\$1,000
Redemptions	Where the Trust is liquid, monthly redemptions at end month subject to 15 business days' prior written notice.
NAV Pricing	Daily
Asset Class	Fixed Interest
Distributions	Monthly
Asset Sector	Australian corporate loans and debt
Management Costs	Approximately 0.6% of the Trust's NAV – includes RE fee (estimated at 0.025%), investment management fee, recoverable expenses and indirect costs.
Performance Fee	May be payable by sub-wholesale funds, waived if target return of the Trust not achieved. The estimated performance fees as at the time of this report are 0.09%.
PRIMARY CONTACT	
Email Address	invest@metrics.com.au
Telephone Number	1300 010 311
Address	2 Ridge Street, North Sydney
Website	www.metrics.com.au/mdif

Investment Profile

HISTORY/BACKGROUND

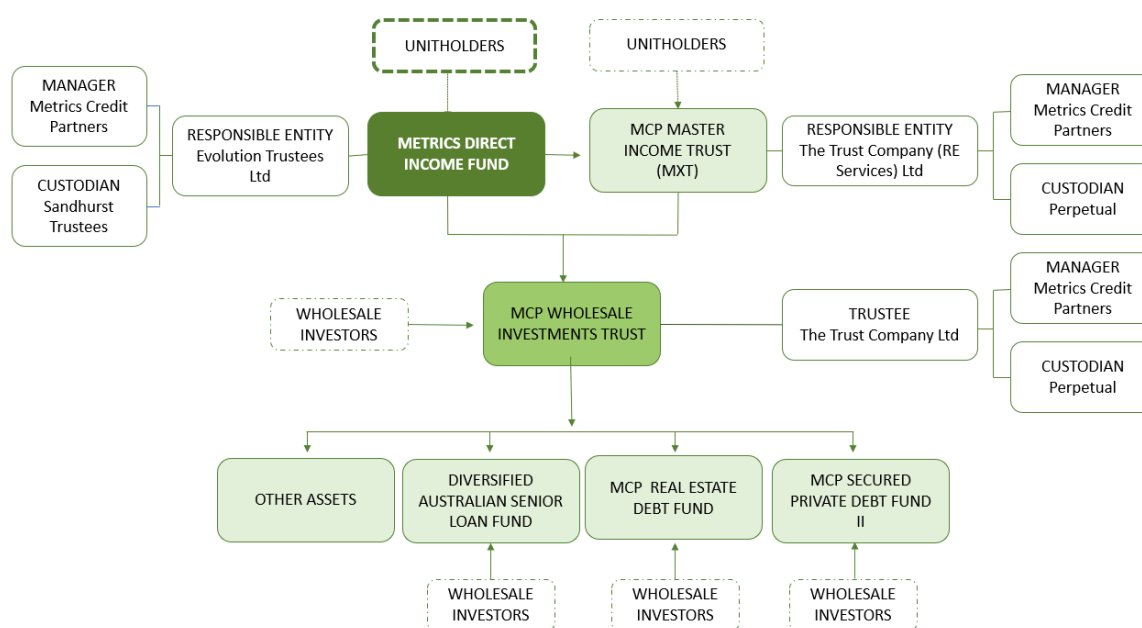
Sydney-based Metrics Credit Partners (Metrics), the Investment Manager of the Metrics Direct Income Fund, was formed in 2011 as a specialist corporate lending manager. Metrics is 100% owned by Metrics Credit Holdings Pty Ltd, 65% of which is controlled by the four Managing Partners; Justin Hynes, Andrew Lockhart, Graham McNamara, and Andrew Tremain. The 35% equity interest in Metrics, which was originally owned by NAB, was bought back and the remaining 35% equity in Metrics Credit Holdings Pty Ltd was acquired by Pinnacle Investment Management in August 2018.

Prior to forming Metrics, the partners collectively had extensive experience within banking environments in loan origination, corporate finance, credit analysis, credit portfolio risk management, leveraged and acquisition finance, syndicated loan transactions, distressed assets, and distribution.

Since inception, Metrics has launched several funds across the credit spectrum. Additionally, Metrics has provided different structures for accessing the funds. The Metrics Direct Income Fund is the first retail fund to be launched.

Trust Structure

The Metrics Direct Income Fund is a registered, managed investment scheme that invests into the MCP Wholesale Investments Trust, which in turn invests in several underlying MCP managed wholesale corporate loan funds.



The MCP Wholesale Investment Trust invests approximately 60-70% into the Metrics Credit Partners Diversified Australian Senior Loan Fund, 20-30% into the MCP Secured Private Debt Fund II and 10-20% into the MCP Real Estate Debt Fund (the Wholesale Funds). In addition, the Manager may, from time-to-time, invest in the listed vehicle, the MCP Master Income Trust (MXT). Details of the respective funds can be found in the 'Portfolio Construction' section of this report.

OBJECTIVE

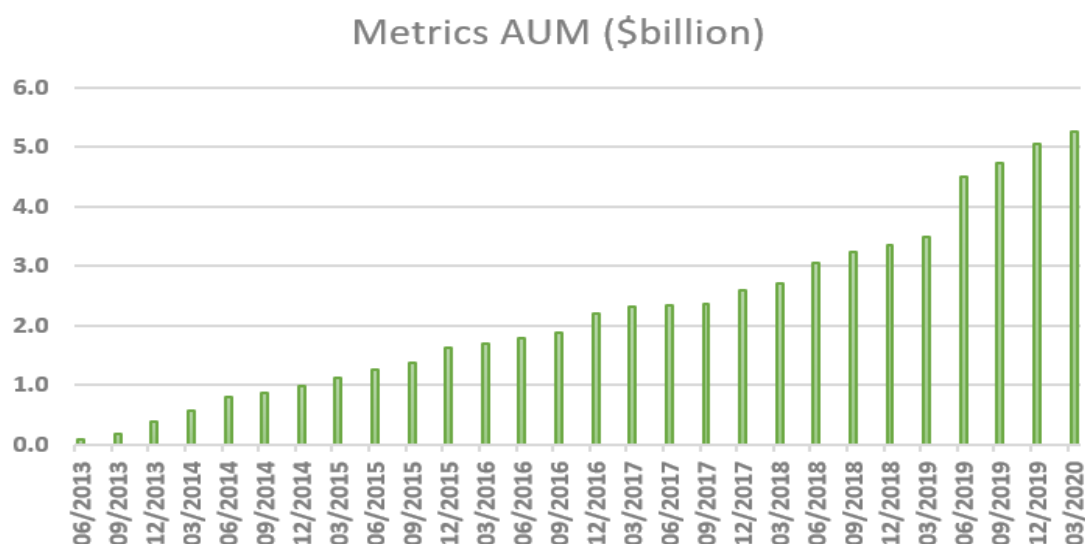
The Trust's Investment Objective is to provide monthly cash income, low risk of capital loss, and portfolio diversification through its exposure to the MCP Wholesale Investments Trust (Sub-Trust) and the Wholesale Funds, by gaining exposure to diversified loan portfolios and participating in Australia's bank-dominated loan market. The Trust may not be successful in reaching its objective. While the Manager believes the Trust will be liquid, there may be periods where an investment in the Trust cannot be redeemed.

Metrics Direct Income Fund

FUNDS UNDER MANAGEMENT

The fund manager, Metrics, has Assets under Management in excess of AUD 5 billion as at June 2020, all of which is equity funded, across 8 wholesale funds.

Growth in Assets Under Management (Metrics)



FEES

The fees paid by investors in this Trust reflect the fees in the underlying wholesale funds, and are comprised of:

Management Fees	<ul style="list-style-type: none"> Management fees (comprising fees payable to the Manager and those payable to the Responsible Entity) – 0.225% per annum of the Trust's NAV, subject to a minimum fee of \$25,080 per annum, calculated and accrued daily and paid monthly in arrears to the Manager from the Trust's assets. Recoverable expenses of the Trust – 0.06% per annum of the Trust's NAV paid out of the Trust's assets once the cost is incurred. Indirect costs in the Wholesale Funds – 0.32% per annum of the Trust's NAV paid by the Wholesale Funds once the cost is incurred, excluding performance fees. 	0.60%
Performance Fees	Performance related fees in the Wholesale Funds – estimated at 0.09% per annum of the Trust's NAV paid by the Wholesale Funds once the cost is incurred.	0.09%

INVESTMENT UNIVERSE

The Trust invests in a portfolio of direct credit; that is untraded corporate loans which broadly reflect activity in Australia's corporate loan market, diversified by borrower, industry, and credit quality. Borrowers will be Australian domiciled (>80%), while the loans may be secured, unsecured, senior or sub-ordinated, investment grade or sub-investment grade.

Although the investments will typically be direct loans to Australian companies, the investment mandate of the sub-trusts give the Trust the ability to use other financial instruments in certain situations. These are listed in the table below. In a workout, the Trust may hold options, equity, and warrants, which carry a greater risk of loss than debt securities should the borrower become insolvent.

Metrics Direct Income Fund

Other Allowable Investments

The mandates of the funds in which the Metrics Direct Income Fund invests also allow the Trust to acquire the following physical and derivative instruments:

Instrument	How the instrument might be used/acquired
Cash and commercial paper	– part of portfolio cash management
Revolving line of credit	– while the loans to counterparties are not leveraged, DALSF has access to a multi-currency line of credit to assist with cash flow and currency management
Bonds, convertible notes, and hybrids	– to assist with portfolio diversification
Options, equity, and warrants	– risk management – where required in a workout scenario
Credit default swaps	– sold where the underlying asset is held by an investment grade counterparty, or – bought as part of risk management strategies
Credit linked notes	– to assist with portfolio diversification
Foreign exchange and interest rate swaps or options	– risk management

While the derivatives above are allowed in the sub-trust mandates, Metrics has not entered into any derivative transaction since inception and is not expected to enter into such transactions based on current portfolio settings.

Comparison of Australian Bonds vs Australian Floating Rate Direct Credit

The Metrics Direct Income Fund is differentiated from other Australian fixed interest funds, both listed and unlisted, through its investment in direct corporate lending rather than traded bonds and cash securities. The corporate bond market is not well developed in Australia, due to the size of the market, cost of issuance for corporates, and uncertainty in the amount that can be raised through a bond issue.

While the corporate loan market has historically been dominated by the four major Australian banks, regulatory restrictions over the last few years have provided greater opportunities for non-bank lenders. The size of the untraded corporate loan market in Australia is estimated to be approximately \$1 trillion.

The Metrics Direct Income Fund, being 100% equity funded, and the Wholesale Funds are well placed to compete against banks for direct corporate lending deal flow and are more agile in the selection of the borrowers it will lend to. Deal flow has increased significantly in the period since the launch of the Metrics first fund in 2013, with Metrics now receiving a greater number of deal opportunities directly from borrowers and from banks. In addition, there has been an increase in invitations to participate in syndicated loans.

For investors, the two sub-asset classes have the following respective advantages:

Corporate Bonds	Direct Corporate Credit
<ul style="list-style-type: none"> ▪ Liquidity ▪ Price Transparency ▪ Potential capital gains 	<ul style="list-style-type: none"> ▪ Diversification – better spread of industry sectors. ▪ Lower price volatility – direct credit is normally priced relatively close to par. ▪ Capital recovery in the event of default can be significantly enhanced through: <ul style="list-style-type: none"> – specific debt covenants; – seniority; – collateral; and – experience of the lender in workout and recovery situations. ▪ Potentially higher margins over floating rate due to illiquidity, complexity of loan offer, and reduced accessibility of debt providers.

Investment Objective

To provide **monthly cash income** with low risk of capital loss and portfolio diversification by actively managing diversified loan portfolios and participating in Australia's bank-dominated corporate loan market. The Manager seeks to implement active strategies designed to balance delivery of the target return, while seeking to preserve investor capital.

Investment Strategy

The Trust's investment strategy is to create a diversified exposure to Australian corporate loans generally reflecting activity in the corporate loan market and with the resultant diversity by borrower, industry, and credit quality. Through active portfolio risk management, Metrics will seek to preserve investor capital.

The strategic objectives include:

- Reduction of borrower risk through lending to public and private companies and projects. As at June 2020, there are over 150 individual investments in the underlying Wholesale Funds. No more than 5% of the Trust's assets are to be invested in any single borrower.
- Lending is across industry sectors. It is not intended that the Trust will invest in the banking sector.
- Diversification by credit quality and investment type.
- Lowering the capital and income volatility.
- Enhanced liquidity, enabling portfolio adjustment.
- Leveraging off the increase in access to deal flow and industry reputation by increasing market size in this sector.

Investment Process

The process undergone by the investment team can be classified into the following areas:

- Portfolio construction
- Asset origination
- Due diligence
- Investment decisions
- Ongoing portfolio risk management

The Investment Committee, comprising the four Managing Partners, meets daily to oversee all aspects of the process. It is responsible for investment decisions, portfolio and industry monitoring, and ensuring compliance with mandates.

Portfolio construction	Portfolio construction considers the relevant target portfolio settings, and Metrics' view on the broader economy, relative industry value and preferred risk setting. Potential new loans are assessed for the impact on the portfolio. Considerations include the type of investment, the target fund returns, the desired mix of tenor to maturity, aggregated exposure by industry group, credit quality, and portfolio liquidity.
Asset origination	Metrics maintains a transaction/investment pipeline, monitoring opportunities as well as the fund's maturity profiles. The time from identification of a potential transaction to successful conclusion can be anything from three months to 18 months. Once identified, a marketing strategy is devised for a target investment, well ahead of the borrower coming to market. As the potential for acquiring a loan asset becomes nearer, more detailed analysis is conducted. The secondary market is also constantly monitored for asset purchase opportunities. The three main sources of pipeline assets are via direct origination, the syndicated loan market and the secondary loan market.

Metrics Direct Income Fund

Due diligence	<p>Metrics estimates that approximately 1 in 10 of the loan opportunities that it identifies proceed to full due diligence. Investment papers are prepared for consideration of new investments. These papers are rigorous and detailed. The key focus is the identification of risks and an analysis of how such risks are to be mitigated. External reviews and due diligence from acceptable independent consultants are also required by Metrics, at the borrower's cost. These cover risk areas such as tax and accounting, financial, technical, commercial, and legal issues relevant to the transaction.</p> <p>Restricted industries: Metrics will not invest where a business may impact reputational risk, including companies that are connected with pornography, tobacco, violation of labour laws, tax avoidance schemes, or weapons manufacture and distribution.</p>
Investment decisions	<p>Using the detailed due diligence/credit analysis investment papers, consideration is given to:</p> <ul style="list-style-type: none"> ■ portfolio limits – credit, maturity, senior debt minimums etc. ■ portfolio liquidity ■ industry limits including restricted industries ■ foreign currency limits ■ individual and aggregated exposure limits
Ongoing portfolio risk management	<p>Loan assets and industries are continuously monitored to ensure the ongoing robustness of portfolio assets. The Metrics team's extensive history in loan portfolio management allows them work with borrowers to seek the best investor outcomes to mitigate the likelihood of default and to recover capital in the event of default.</p>

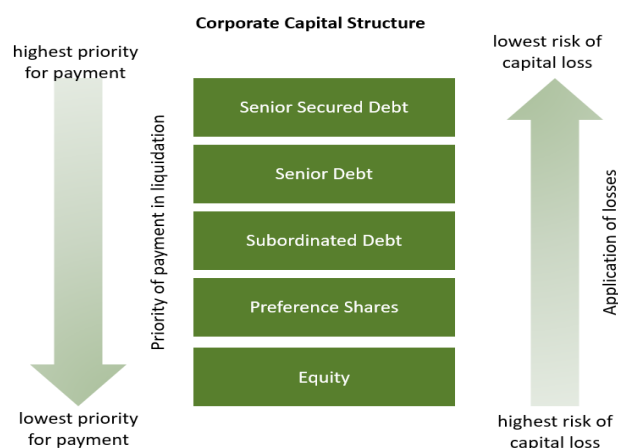
Asset Pricing

Metrics, Evolution, and the external valuation consultant, an international accounting firm, closely monitor the Australian credit market in calculating the Net Asset Value (NAV) of the Wholesale Funds on a daily/monthly basis.

The primary valuation risk lies in either negative credit migration, i.e. an increased likelihood of default through either change in the borrower's ability to service the loan or in industry/sector macro-economic factors, and sector credit margin changes. Potential reductions in loan valuation can be reduced substantially on loans that are structured effectively using loan covenants, tenor, and seniority. Note that in Australia there is a high level of lender protection due to the regulatory and legal framework. Taking the valuation factors of the portfolio of loans that the Metrics Direct Income Fund is exposed to – buy-to-hold, good use of covenants, seniority, security, the regulatory framework, and the risk targeted due diligence by Metrics – the indication is that there will be a high level of capital stability, with the Trust assets being priced at close to par.

Protection of Corporate Capital Structure

It is important to compare the risk of capital loss from a corporate debt portfolio with the potential loss from investing in an equity portfolio. In Australia, corporate loans are normally ranked as senior secured, senior unsecured, or subordinate/mezzanine debt. In the event of a corporate default scenario, all debt must be paid before there is any return to equity holders. This is a simple example of the relative risk of each asset class:



Metrics Direct Income Fund

Portfolio Construction

The Metrics Direct Income Fund invests, via the MCP Wholesale Investments Trust, in three underlying wholesale trusts in the following allocation ranges at the discretion of the Manager. The three funds, key characteristics, and allocation range in each are:

Fund	Key Objectives	Allocation Range
Metrics Credit Partners Diversified Australian Senior Loan Fund	<ul style="list-style-type: none"> - target average credit BBB-/BB+ - >90% senior ranking loans - >80% Australia domiciled - Indicative return 90day BBSW plus margin of 2.75% - 3.25% p.a. through the cycle 	60-70%
MCP Real Estate Debt Fund	<ul style="list-style-type: none"> - >50% senior ranking loans - Minimum target return 90day BBSW plus 5% p.a. - Diversified by sector and geography 	10-20%
MCP Secured Private Debt Fund II	<ul style="list-style-type: none"> - 100% Australian domicile - Minimum target return 90day BBSW plus 4% p.a. - predominantly sub-investment grade assets 	20-30%

The Trust may from time to time invest in the MCP Master Income Trust (ASX: MXT).

The three underlying portfolios each offer a diverse investment mix, with the differentiated credit, tenor and sector exposures giving the Investment Committee good flexibility in portfolio construction.

Investment Team

The depth of experience of the investment team, particularly the Managing Partners, is a key differentiator for this investment. Direct corporate credit is a private and confidential market and the skills needed to succeed differ from the skills needed for the management of a publicly traded bond portfolio. Depth of experience is essential to good risk management and directly affects the ability to achieve a well-diversified portfolio with a low risk of capital loss.

Investment Team Structure

Managing Partners Investment Committee & Executive Management Committee

**Justin
Hynes**

**Andrew
Lockhart**

**Graham
McNamara**

**Andrew
Tremain**

Managing Partners are supported by:

- Investment Directors (16)
- Investment Associates (12)
- Investment Analysts (5)

- Legal (3)
- External Relations (4)
- Loan Administration (4)
- Accounting (4)
- Corporate Services (4)

Key Responsibilities of Investment Team:

Investment Committee

- Portfolio construction
- Investment decisions
- Credit rating analysis
- Investor monitoring
- Borrower engagement
- Cash flow management
- ESG compliance
- Capital budgets

Asset Origination

- Credit risk due diligence
- Investment Submission
- Cash flow monitoring
- Credit Rating analysis
- Legal documentation
- Transaction execution
- ESG compliance

Portfolio Risk Management

- Mandate compliance
- Ongoing credit monitoring
- Ongoing portfolio management
- Ongoing credit analysis
- Stress test analysis
- Investor reporting
- ESG compliance

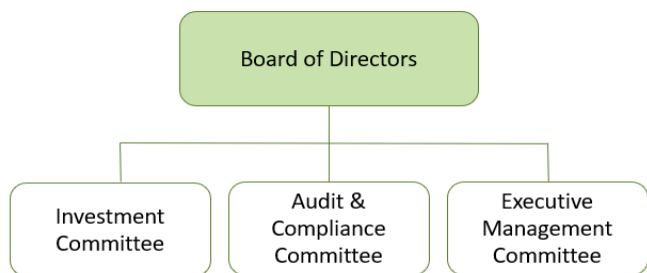
As at the date of this report, Metrics has increased its employee numbers to 56. Metrics is continuing to recruit as Funds Under Management (FUM) increases.

Metrics typically uses a deal team structure for potential transactions. This might comprise two Investment Directors, a Managing Partner, an Investment Associate, an Investment Analyst, and members of the Legal team.

Key Experience – Managing Partners / Investment Committee

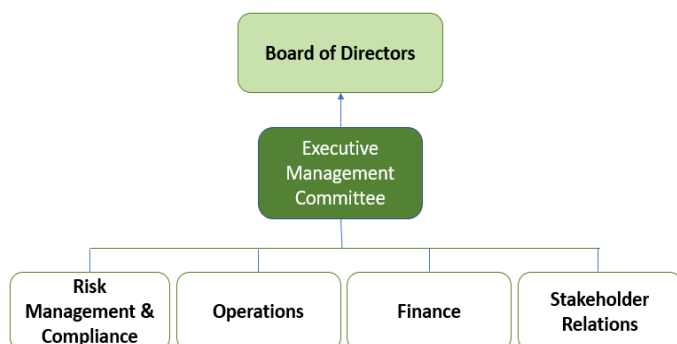
Andrew Lockhart	<ul style="list-style-type: none"> ■ Key responsibility is Metrics Finance and Stakeholder Relations activities. ■ Andrew has approximately 33 years' banking, funds management, and financial markets experience. ■ Andrew's specialist areas have included origination and portfolio risk management of large, diversified and complex loan portfolios, leverage and acquisition finance, corporate and institutional lending and corporate restructuring.
Justin Hynes	<ul style="list-style-type: none"> ■ Key responsibility is Metrics' operational activities. ■ Justin has approximately 23 years' financial market experience. ■ Justin's specialist areas have included leverage and acquisition finance, corporate finance, loan origination, structuring and portfolio management, and corporate workout and restructuring.
Graham McNamara	<ul style="list-style-type: none"> ■ Key responsibility is Metrics' Risk Management and Compliance function. ■ Graham has approximately 40 years' experience in banking, funds management, and financial markets. ■ Graham's specialist areas include portfolio risk management, debt origination and distribution, agency management corporate workout and recovery, and corporate banking. He has established the loan syndications and agency business at major Australian banks. ■ Graham served as a director of the Asia Pacific Loan Market Association and was the founding chairman of the Association's Australian branch.
Andrew Tremain	<ul style="list-style-type: none"> ■ Andrew has approximately 33 years' Australian, European, and Asian banking experience. ■ Andrew's specialist areas include corporate, structured, leverage and acquisition finance, loan syndications, portfolio management, corporate workout and recovery, and relationship management.

Business Management



The Board comprises the Managing Partners as four directors, two from Pinnacle, and an independent Non-Executive Chairman.

The Board meets approximately six times a year. The Investment Committee is entirely independent in its decision making.



Metrics has distinct structures in place to separate the investment activities from operational aspects of the business, and all activities of Metrics are subject to Board oversight.

The Executive Committee meets weekly, the Managing Partners delegated specific business line responsibilities.

The Executive is supported by external resources, organised along functional business lines.

Risk Management

Metrics:	Metrics has detailed policies and procedures addressing operational risk articulated in its Operational and Investment Policy Manual. These policies and procedures are reviewed and updated on an annual basis and monitored and managed via the Executive Management Committee and the Audit and Compliance Committee.
Metrics Funds:	Operational risks are identified, modified, and mitigated via RE/trustees fund compliance plans as well as through various policies and procedures MCH Fund Administration Services, Automic and the Fund RE/Trustees have in place.

Metrics Direct Income Fund

Performance

This is a new Trust and therefore does not have any performance history.

However, the Trust strategy is to invest in the MCP Wholesale Investments Trust, a Fund of Fund with a performance history from October 2018 which is shown below. Note that the fee structure is slightly different for this Trust. This proxy performance is useful in giving insight into the stability of returns.

MCP WHOLESALE INVESTMENTS TRUST: - MONTHLY RETURNS (% net)

(%)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020	0.48	0.44	0.48	0.47	0.42							
2019	0.54	0.50	0.59	0.59	0.58	0.50	0.46	0.46	0.42	0.46	0.46	0.47
2018	0.42	0.35	0.48	0.59	0.55	0.49	0.54	0.53	0.50	0.54	0.51	0.57
2017										0.45	0.40	0.42

Source: Metrics

MCP WHOLESALE INVESTMENTS TRUST: - FUND SETTINGS (as at end May 2020)

Number of individual investments	147
Investment Grade (%)	50%
Interest duration (days)	45
Credit duration (years)	2.5

Source: Metrics Capital

MCP WHOLESALE INVESTMENT TRUST SUB FUNDS

1. Metrics Credit Partners Diversified Australian Senior Loan Fund

The Metrics Credit Partners Diversified Australian Senior Loan Fund is the biggest contributor to the ongoing performance of the MCP Wholesale Investments Trust, with an expected 60% investment. The fund offers investors direct exposure to Australia's corporate loan market by investing in bilateral, club-style, and syndicated loans and other debt assets provided to Australian public and private companies and projects. Net income is distributed monthly. The fund seeks to deliver a return of the benchmark (Bank Bills/BBSW 90 days) plus credit margin (+275-325 bps pa net), while adhering to fund parameters. The issuer rating of this Fund was recently upgraded (March 2020) to A- by Standard & Poors.

Net Returns (annualised) to end May 2020

	3 month	6 month	1 year	3 year	Since Inception
Portfolio Return	4.6%	4.4%	4.3%	4.7%	4.9%
Excess Returns to:					
90-day BBSW	4.1%	3.8%	3.5%	3.2%	2.9%
RBA Cash Rate	4.2%	3.9%	3.6%	3.4%	3.1%

Source: Metrics

As at 31 May 2020, this Fund has the following characteristics:

- 98% senior debt and 100% Australian assets
- Weighted average credit rating of BBB-
- 117 individual investments
- 59% investment grade

Metrics Direct Income Fund

2. MCP Secured Private Debt Fund II

The MCP Wholesale Investments Trust targets an investment of 20% of the portfolio in the MCP Secured Private Debt Fund II. The Fund invests in a portfolio of Australian corporate debt across mid-market corporate borrowers. The fund provides loans to predominantly sub-investment grade, mid-market corporate borrowers. Net income is distributed monthly. The fund seeks to deliver the minimum hurdle return of the benchmark (Bank Bills/BBSW 90 days) plus credit margin (+400 bps pa net) while adhering to Fund parameters.

Net Returns (annualised) to end May 2020

	3 month	6 month	1 year	3 years	Since Inception
Net Return	7.2%	7.4%	7.1%		8.2%
Excess Returns to:					
90-day BBSW	6.8%	6.7%	6.2%		6.7%
RBA Cash Rate	6.9%	6.8%	6.3%		6.9%

Source: Metrics

As at 31 May 2020, this Fund has the following characteristics:

- 68% senior debt
- 100% Australian assets
- 37 individual investments

3. MCP Real Estate Debt Fund

The MCP Wholesale Investments Trust targets an investment of 20% of the portfolio in the MCP Real Estate Debt Fund. The fund lends to Australian CRE borrowers and projects including office, retail, industrial, residential development, and specialised real estate assets (hotels, healthcare, etc). Net income is distributed monthly. The fund seeks to deliver the minimum hurdle return of the benchmark (Bank Bills/BBSW 90 days) plus credit margin (+500 bps pa net) while adhering to Fund parameters.

Net Returns (annualised) to end May 2020

	3 month	6 month	1 year	Since Inception
Net Return	7.0%	7.4%	7.8%	8.2%
Excess Returns to:				
90-day BBSW	6.6%	6.8%	6.9%	6.7%
RBA Cash Rate	6.7%	6.9%	7.0%	7.0%

Source: Metrics

As at 31 May 2020, this Fund has the following characteristics:

- 86% senior debt
- 100% Australian assets
- 42 individual investments

Transparency & Reporting

Metrics provides both standardised and bespoke reporting to its clients, depending on their individual reporting requirements.

Metrics is committed to being transparent.

Standardised reporting comprises:

- Monthly performance reporting.
- Quarterly performance reporting with commentary.
- Transaction confirmations and monthly holding statements (for wholesale investors in underlying funds).
- Audited annual accounts and regulatory reporting (including income tax and distribution statements).

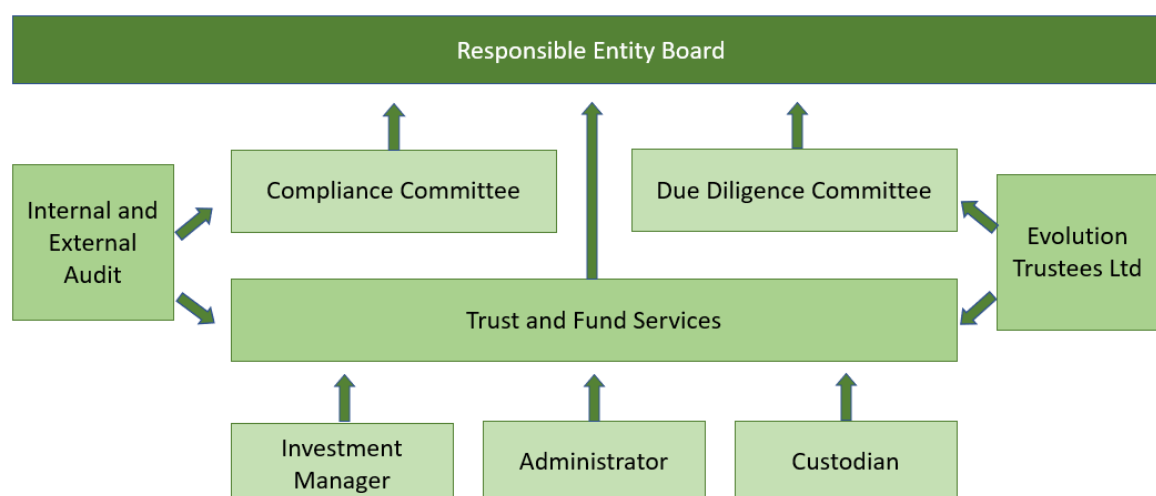
Compliance

The Metrics Direct Income Fund is subject to the governance and compliance structure designed, implemented, and monitored by the RE.

A compliance plan is in place to ensure that:

- duties and obligations as RE/trustees are met;
- key control activities exist to ensure compliance; and
- monitoring activities exist, which identify whether controls are operating effectively.

The Trust is subject to both internal and external audit. Metrics Funds are externally audited by KPMG, including an audit of Metrics' adherence to its obligations under its AFS licence. Metrics has a Compliance Committee which reports to the RE/Trustee Board. This Committee comprises one internal member and two external members.



The RE Audit & Compliance Committee meets quarterly. The Compliance Plan is audited by Deloitte.

Metrics Direct Income Fund

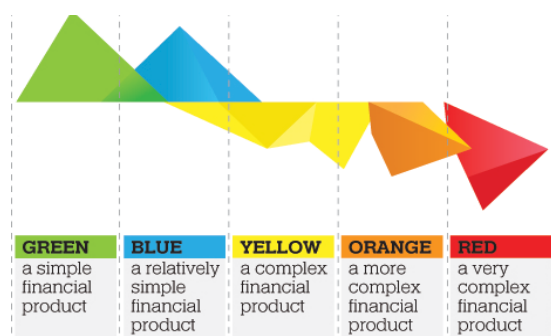
Investment Rating Scale

The Australia Ratings Analytics' investment rating is an opinion on how well we believe a fund will perform against a range of risks.

Rating	Definition
Superior	Indicates the highest level of confidence that the fund can deliver a risk adjusted return in line with the investment objectives of the fund.
Very Strong	Indicates a very strong conviction that the fund can deliver a risk adjusted return in line with the investment objective of the fund.
Strong	Indicates a strong conviction that the fund can deliver a risk adjusted return in line with the investment objective of the fund.
Competent	Indicates that the fund may deliver a return in line with the funds relevant benchmark.
Weak	Indicates a view that the fund is unlikely to deliver a return in line with the investment objective of the fund and/or meet the returns of its benchmark.

Product Complexity Indicator

A Product Complexity Indicator (PCI) highlights the complexity of an investment by its terms and conditions' structure and transparency that may affect the investor's return.



Credit Rating & Product Complexity Methodology

Australia Ratings Analytics' methodology for its investment rating and research can be downloaded from its website.

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