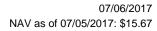
Very Dangerous Rating



TSNAX Touchstone Funds Group Trust: Touchstone Sands Capital Select Growth Fund

- · Predictive Ratings are based on the aggregation of our models for the fund's holdings, all of the fund's expenses, & the fund's overall rank.
- Stock-picking (Portfolio Management) and fund expenses (Total Annual Costs) drive fund performance.

Investment Recommendation

- We strongly recommend investors avoid TSNAX. We recommend its ETF benchmark IWF.
- · We expect the fund to continue underperforming the market on a total return basis.
- TSNAX's Portfolio Management rating does not justify its high Total Annual Costs.

New Constructs[®]

Diligence | Independence | Performance

Portfolio Management Rating Details

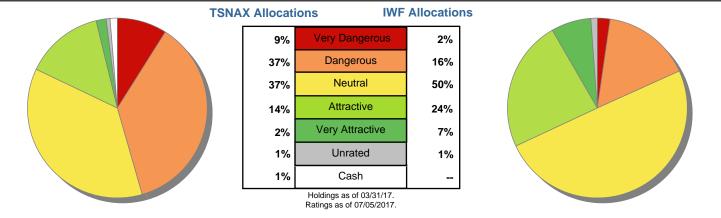
- TSNAX receives our Dangerous Portfolio Management rating because its aggregate holdings are expected to underperform the aggregate holdings of IWF.
- IWF, TSNAX's benchmark, receives our Attractive rating.
- Our fund analytics are based on aggregating our models and ratings for each fund's holdings.
- Our top-ranked stock ratings leverage key data from the financial footnotes for unrivaled research quality.

Fund Rankings

- 8th percentile of the 7000+ equity funds we cover.
- · 634 out of 638 Large Cap Growth funds.
- All 17 ETFs in the same category rank better.
- · See rankings for all US equity funds on our fund screener.

Portfolio Management Rating Breakdown						
Quality of Earnings Components: Ratings & Values						
Attractive	Economic vs Reported EPS	Positive EE				
Attractive	Return on Invested Capital (ROIC)	13%				
Valuation Components: Ratings & Values						
Neutral	Free Cash Flow Yield	-1%				
Very Dangerous	Price to Economic Book Value Ratio	5.4				
Very Dangerous	Growth Appreciation Period	51 year(s)				
Fund Asset Allocation: Rating & Value						
Attractive	Cash Allocation	1% cash				

Stock and Cash Rating Allocations vs Benchmark - iShares Trust: iShares Russell 1000 Growth ETF (IWF)



Active Management Commentary

.

TSNAX allocates 46% of its value to Dangerous-or-worse-rated stocks while IWF allocates 18%.

TSNAX allocates 16% of its value to Attractive-or-better-rated stocks while IWF allocates 31%.

- Investors should expect funds with higher Total Annual Costs to allocate more value to Attractive and Very Attractive Stocks and less to Dangerous and Very Dangerous stocks than alternative funds with lower costs.
- Active portfolio management of TSNAX does not add value versus its ETF benchmark IWF.

Return - Annual Top 5 Holdings		Key Mutual Fund Statistics					
Year to Date 1 Year 3 Year 5 Year Inception	22.4% 24.9% 5.1% 12.0% 13.0%		V FB PCLN AMZN CRM	Net Assets(mm) NAV Benchmark # of Holdings Initial Min	\$2,395.70 \$15.67 IWF 32 \$2,500	Category Mgmt Co Manager Tenure Inception	Large Cap Growth Touchstone Advisors Inc Sands/Sramek/Johnston 2000 11/15/2010
Data from Lipper, a Thomson Reuters Company, and New Constructs, LLC. Details on Total Annual Costs Rating are on page 2.							



ROBO-ANALYST FUND RATING

07/06/2017

Total Annual Costs Rating and Ranking

Rating	Total Annual Costs	Fund Universe % Rank	Category Rank
Dangerous	3.51%	12%	582 of 638

This rating reflects all expenses, loads, fees, and transaction costs in a single value that is comparable across all funds.

Total Annual Costs Breakdown

	Annualized Values			
All Cost Types	TSNAX	Benchmark: IWF		
Front-End Load	2.19%			
Expense Ratio	1.21%	0.22%		
Back-End Load	0.00%			
Redemption Fee	0.00%			
Transaction Costs	0.10%			
Total Annual Costs	3.51%	0.22%		

 To justify its higher Total Annual Costs, TSNAX must outperform its ETF benchmark before all costs by 3.28% annually over 3 years or 1.72% annually over 10 years.

- This analysis assumes a 3-year holding period, the average for all funds.
- Transaction costs are estimated using the fund's annual portfolio turnover ratio of 46%.

Data from Lipper, a Thomson Reuters Company, and New Constructs, LLC.

Overview of Our Predictive Mutual Fund Rating System

New Constructs' <u>Predictive Fund Ratings</u> enable smarter investing by assessing the key drivers of future fund performance. We start by analyzing every fund holding based on New Constructs' stock ratings, which are regularly featured as among the <u>best by Barron's</u>. Next, we measure and rank the all-in costs of investing in a fund. Finally, we rank the fund compared to all other funds to identify the best and worst funds in the market.

- Intuitively, there are two drivers of future fund performance.
 - 1) New stock-picking (Portfolio Management Rating) and
 - 2) Fund expenses (Total Annual Costs Rating) drive investment performance

The figure below details the criteria that drive our Predictive Rating system for funds. The drivers of our predictive rating system are Portfolio Management and Total Annual Costs. The Portfolio Management Rating (details here) is the same as our Stock Rating (details here) except that we incorporate Asset Allocation (details here) in the Portfolio Management Rating. The Total Annual Costs Rating (details here) captures the all-in cost of being in a fund over a 3-year holding period, the average period for all mutual fund investors.

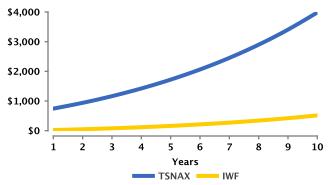
	Portfolio Management Rating						
Predictive Rating	Quality of Earnings		Valuation			Asset Allocation I	Total Annual Costs Rating
	Economic vs Reported EPS	Return on Invested Capital (ROIC)	FCF Yield	Price-to-EBV Ratio	Growth Appreciation Period (yrs)	Cash %	-
Very Dangerous	Misleading Trend	Bottom Quintile	< -5%	> 3.5 or -1 < 0	> 50	> 20%	> 4%
Dangerous	False Positive	4th Quintile	-5% < -1%	2.4 < 3.5 or < -1	20 < 50	8% < 20%	2% < 4%
Neutral	Neutral EE	3rd Quintile	-1% < 3%	1.6 < 2.4	10 < 20	2.5% < 8%	1% < 2%
Attractive	Positive EE	2nd Quintile	3% < 10%	1.1 < 1.6	3 < 10	1% < 2.5%	0.5% < 1%
Very Attractive	Rising EE	Top Quintile	> 10%	0 < 1.1	0 < 3	< 1%	< 0.5%

Reported Costs vs Benchmark: as of 01/30/2017 TSNAX Benchmark: IWF

Front-End Load	5.75%	
Expense Ratio	1.07%	0.20%
Back-End Load	0.00%	
Redemption Fee	0.00%	

Accumulated Total Costs vs Benchmark

Accumulated Total Costs represent the dollar value of costs investors incur during a 10-yr holding period. Assumes a \$10,000 investment and a 10% annual return for the fund and its benchmark.



 3-year Accumulated Total Costs are \$1,163.72 for TSNAX and \$79.70 for IWF. 10-year Accumulated Total Costs are \$3,984.71 for TSNAX and \$514.10 for IWF.



07/06/2017

New Constructs® - *Research to Fulfill the Fiduciary Duty of Care*

Ratings & screeners on 3000 stocks, 450 ETFs and 7000 mutual funds help you make prudent investment decisions.

New Constructs leverages the latest in machine learning to analyze structured and unstructured financial data with unrivaled speed and accuracy. The firm's forensic accounting experts work alongside engineers to develop proprietary NLP libraries and financial models. Our investment ratings are based on the best fundamental data in the business for stocks, ETFs and mutual funds. Clients include many of the top hedge funds, mutual funds and wealth management firms. David Trainer, the firm's CEO, is regularly featured in the media as a thought leader on the fiduciary duty of care, earnings quality, valuation and investment strategy.

To fulfill the Duty of Care, research should be:

- 1. **Comprehensive** All relevant publicly-available (e.g. 10-Ks and 10-Qs) information has been diligently reviewed, including footnotes and the management discussion & analysis (MD&A).
- 2. Un-conflicted Clients deserve unbiased research.
- 3. Transparent Advisors should be able to show how the analysis was performed and the data behind it.
- 4. Relevant Empirical evidence must provide tangible, quantifiable correlation to stock, ETF or mutual fund performance.

Value Investing 2.0: Diligence Matters: Technology is Key to Value Investing with Scale

Accounting data is only the beginning of fundamental research. It must be translated into economic earnings to truly understand profitability and valuation. This translation requires deep analysis of footnotes and the MD&A, a process that our <u>robo-analyst technology</u> empowers us to perform for thousands of stocks, ETFs and mutual funds.

DISCLOSURES

New Constructs®, LLC (together with any subsidiaries and/or affiliates, 'New Constructs') is an independent organization with no management ties to the companies it covers. None of the members of New Constructs' management team or the management team of any New Constructs' affiliate holds a seat on the Board of Directors of any of the companies New Constructs covers. New Constructs does not perform any investment or merchant banking functions and does not operate a trading desk.

New Constructs' Stock Ownership Policy prevents any of its employees or managers from engaging in Insider Trading and restricts any trading whereby an employee may exploit inside information regarding our stock research. In addition, employees and managers of the company are bound by a code of ethics that restricts them from purchasing or selling a security that they know or should have known was under consideration for inclusion in a New Constructs report nor may they purchase or sell a security for the first 15 days after New Constructs issues a report on that security.

DISCLAIMERS

The information and opinions presented in this report are provided to you for information purposes only and are not to be used or considered as an offer or solicitation of an offer to buy or sell securities or other financial instruments. New Constructs has not taken any steps to ensure that the securities referred to in this report are suitable for any particular investor and nothing in this report constitutes investment, legal, accounting or tax advice. This report includes general information that does not take into account your individual circumstance, financial situation or needs, nor does it represent a personal recommendation to you. The investments or services contained or referred to in this report are survices.

Information and opinions presented in this report have been obtained or derived from sources believed by New Constructs to be reliable, but New Constructs makes no representation as to their accuracy, authority, usefulness, reliability, timeliness or completeness. New Constructs accepts no liability for loss arising from the use of the information presented in this report, and New Constructs makes no warranty as to results that may be obtained from the information presented in this report. Past performance, should not be taken as an indication or guarantee of future performance, and no representation or warranty, express or implied, is made regarding future performance. Information and opinions contained in this report reflect a judgment at its original date of publication by New Constructs and re subject to change without notice. New Constructs may have issued, and may in the future issue, other reports that are inconsistent with, and reach different conclusions from, the information presented in this report. Those reports reflect the different assumptions, views and analytical methods of the analysts who prepared them and New Constructs is under no obligation to insure that such other reports are brought to the attention of any recipient of this report.

New Constructs' reports are intended for distribution to its professional and institutional investor customers. Recipients who are not professionals or institutional investor customers of New Constructs should seek the advice of their independent financial advisor prior to making any investment decision or for any necessary explanation of its contents.

This report is not directed to, or intended for distribution to or use by, any person or entity who is a citizen or resident of or located in any locality, state, country or jurisdiction where such distribution, publication, availability or use would be contrary to law or regulation or which would be subject New Constructs to any registration or licensing requirement within such jurisdiction.

This report may provide the addresses of websites. Except to the extent to which the report refers to New Constructs own website material, New Constructs has not reviewed the linked site and takes no responsibility for the content therein. Such address or hyperlink (including addresses or hyperlinks to New Constructs own website material) is provided solely for your convenience and the information and content of the linked site do not in any way form part of this report. Accessing such websites or following such hyperlink through this report shall be at your own risk.

All material in this report is the property of, and under copyright, of New Constructs. None of the contents, nor any copy of it, may be altered in any way, copied, or distributed or transmitted to any other party without the prior express written consent of New Constructs. All trademarks, service marks and logos used in this report are trademarks or service marks or registered trademarks or service marks of New Constructs.

Copyright New Constructs, LLC 2003 through the present date. All rights reserved.