

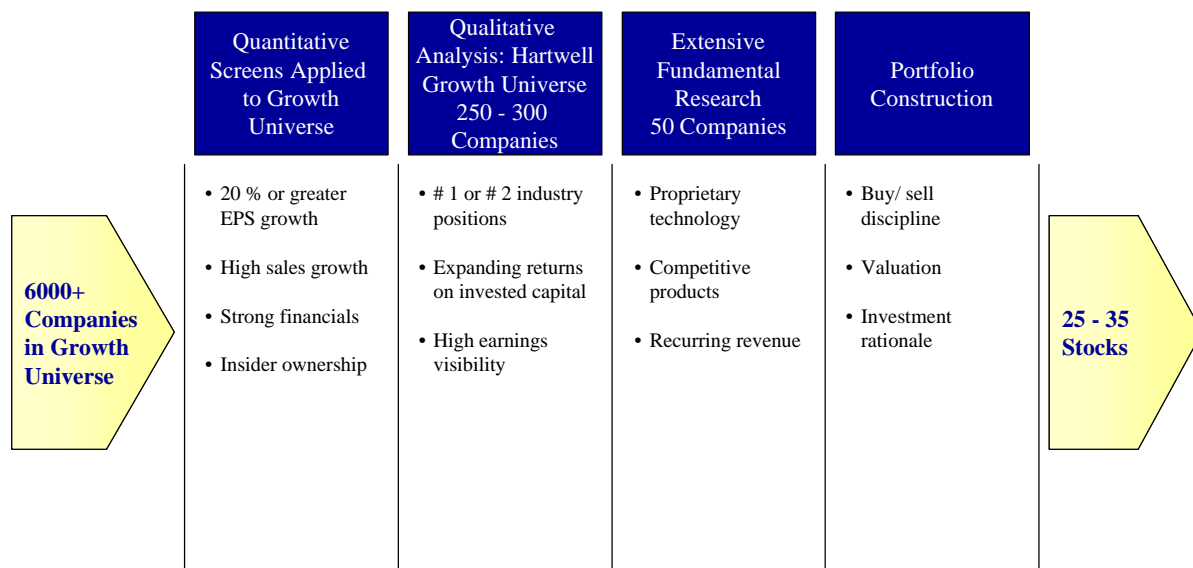
The Investment Process

The Hartwell Process

"Effective portfolio management goes beyond simply assembling a random selection of 'good' growth stocks."

- Adrian S. Dawes

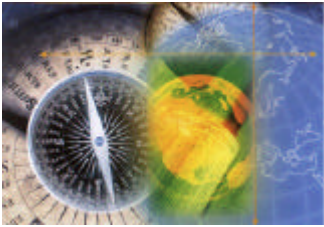
We begin by using quantitative screens across the growth universe to find companies that meet Hartwell's growth criteria:



- Above average EPS growth
- High sales growth
- Strong financials
- Insider ownership

Because stocks that do not fit the Hartwell criteria do not distract our investment professionals, we are able to concentrate in depth on a select group of premiere growth companies. We then apply a qualitative analysis of the companies within our universe by looking for companies that have:

- #1 or #2 industry position



J.M. Hartwell L.P.

Investment Counsel Since 1961

- Expanding return on invested capital
- High earnings visibility

Hartwell managers then use extensive proprietary research to find companies with:

- Proprietary technology
- Competitive products
- Recurring revenue

Once the companies have been identified by our portfolio managers and analysts, we rigorously adhere to our risk management disciplines and constantly review our:

- Buy / sell disciplines
- Valuation parameters
- Investment rationale