

Target Market Determination for ARA Super - Accumulation

Introduction

This Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth (Act)). This TMD describes the class of consumers that comprises the target market for the financial product and matters relevant to the product's distribution and review (specifically, distribution conditions, review triggers and periods, and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the product being consistent with the most recent TMD (unless the distribution is excluded conduct).

This document is **not** a product disclosure statement (PDS) and is **not** a complete summary of the product features or terms of the product. This document does not take into account any person's individual objectives, financial situation or needs and does not contain any financial product advice. Persons interested in acquiring this product should carefully read the PDS for the product and any supplementary disclosure documents for the product before making any decisions about whether to acquire this product.

Important terms used in this TMD are defined in the TMD Definitions which supplement this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained online via InvestorHUB or via your Financial Adviser.

Product and issuer identifiers

Name of product	ARA Super -Accumulation ('the product')
Issuer name	HTFS Nominees Pty Limited (Issuer)
Issuer ABN	78 000 880 553
Issuer AFSL	232 500
TMD issue date	10 November 2023
TMD Version	2
Distribution status of product	Available
Fund name	HUB24 Super Fund (Fund)
Fund ABN	60 910 190 523
USI code	60 910 190 523 001

Product description and Key attributes

Product description	<p>This is a superannuation product for individuals to accumulate savings for retirement.</p> <p>This product is not a self-managed super fund.</p>
Key product attributes	<p>This product:</p> <ul style="list-style-type: none"> • Has investment options/choices for a consumer to make. • Provides members with the option to select from a range of investments, allowing them to tailor a portfolio, with their adviser, that meets their individual needs and objectives. Consumers may switch between these investment options if and as their objectives, financial situation and needs change. <p><u>Investment Menu</u></p> <p>ARA Super may be suitable for members who are looking for an investment menu that includes:</p> <ul style="list-style-type: none"> • Managed funds, and • Term deposit products. <ul style="list-style-type: none"> • Online access - there are a range of different types of reports available which allows consumers to track and monitor their account. These include, but are not limited to: <ul style="list-style-type: none"> • Portfolio valuation, • Investment performance, • Income and expenses, and • Annual Statements. • The product offers access to group insurance arrangements or an individual insurance arrangement through a panel of approved external insurers. The type of insurance covers available include: <ul style="list-style-type: none"> • Death cover, including terminal illness cover, • Total & Permanent Disablement (TPD) cover, • Income Protection (IP) cover, including a range of waiting periods and benefit payment periods, and • The ability to transfer existing cover held into the Fund if it meets relevant transfer conditions and transfer terms set by the Fund's Insurer. • The product also offers various estate planning options: <ul style="list-style-type: none"> • Binding Beneficiary Nominations, such as, lapsing and non-lapsing

	<ul style="list-style-type: none"> • Non-Binding Nomination • No Nomination • Preservation rules – Amounts saved into superannuation cannot be withdrawn until retirement except in certain permitted scenarios. • Concessional tax treatment. • Product options for members who are receiving personal financial advice.
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Description of Target Market

The Target Market is the class of persons who are the type of consumer set out below, who have the needs and objectives set out below and are in the financial situation set out below.

TMD indicator key

The Consumer Attributes for which the product is likely to be appropriate have been assessed using a red and green rating methodology:



Instructions

In the tables below, Column 1 indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering the product. Column 2 indicates whether a consumer meeting the attribute in column 1 is likely to be in the target market for the product.

Consumer objectives

For an individual consumer, this product is likely to be consistent with any one or more of the following short term and long term objectives:

- to accumulate capital/wealth for retirement
- to provide a source of income during retirement
- to provide an environment for concessional taxation of savings
- to obtain protection through having insurance

Level of decision making

Table 1: Consumer's intended level of decision making	Product consistency
Fully self-managed, including fund administration	Not in target market
Investments chosen by consumer from extensive investment menu, with administration provided by the Issuer	In target market
Investments chosen by consumer from limited investment menu, with administration provided by the Issuer	In target market
Default investment strategy applied where no investments selection is made. Administration is provided by the Issuer	Not in target market

Product investment menu

Table 2: Consumer's intended type of investment products on the investment menu	Product consistency
Ready-made Diversified Portfolio solutions to suit a range of risk/return profiles from low to high	
Sector specific options	In target market
Sub-sector specific options	In target market
Alternative investment options	In target market
Active investment options <ul style="list-style-type: none"> No manager choice 	Not in target market
Active investment options <ul style="list-style-type: none"> Some manager choice 	In target market
Active investment options <ul style="list-style-type: none"> Wide manager choice 	In target market
Passive investment options, such as passive exchange traded funds	Not in target market
Ready-made diversified portfolio options	Not in target market
Term deposit options	In target market
Direct share options	Not in target market
Separately managed accounts	Not in target market
Cash management account	In target market
Longevity product options	Not in target market
Capital preservation options	In target market

Number of investment holdings

Table 3: Consumer's desired number of investment holdings	Product consistency
Low – consumer intends to hold no more than 5 investment options	In target market
Medium – consumer intends to hold between 5 and 15 investment options	In target market
High – consumer intends to hold more than 15 investment options	In target market

Financial Advice

Table 4: Consumer's desired availability of financial advice	Product consistency
Consumer wishes to have the option to receive comprehensive personal financial advice in relation to the product.	In target market
Consumer wishes to have the option to receive personal financial advice through the Fund that relates to the consumer's interest in the product (intrafund advice).	Not in target market
Consumer does not wish to have the option to receive financial advice in relation to the product.	Not in target market
Consumer wishes to have the option to authorise an external financial adviser to assist in managing the consumer's interest in the product.	In target market

Insurance Options available

Table 5: Consumer's intended insurance options available	Product consistency
Life Insurance cover available separately	In target market
TPD cover available separately	Not in target market
Life insurance and TPD cover available jointly	In target market
Income protection cover available	In target market
Life insurance, TPD and IP cover available jointly	In target market
Insurance not required	In target market

Life and TPD Insurance

Table 6: Consumer's intended life and TPD insurance cover	Product consistency
<p>The consumer is seeking life insurance cover or life and TPD insurance cover through the product, either through the group life insurance options or through retail insurance options, that will assist the consumer with financial or financial-in-kind commitments that will not otherwise be satisfied in the event of death or terminal illness.</p>	<p>In target market</p>
<p>The consumer satisfies the demographic and eligibility requirements for the product's life insurance cover or life and TPD insurance cover, i.e. consumers:</p> <ul style="list-style-type: none"> • are aged between 18 and 69 (life insurance cover); • are aged between 18 and 64 (TPD insurance cover); • are not engaged in a 'hazardous occupation' (as defined in the insurance guide for the product); • are in Australia; and • have Australian residency. 	<p>In target market</p>
<p>The consumer does not satisfy the demographic and eligibility requirements for the life insurance cover or life and TPD insurance cover specified in the previous row</p>	<p>Not in target market</p>

Disability income insurance (Income protection)

Table 7: Consumer's intended disability income insurance cover	Product consistency
<p>The consumer is seeking disability income insurance in this product that will assist the consumer with financial or financial-in-kind commitments that will not otherwise be satisfied in the event of disability.</p>	<p>In target market</p>
<p>The consumer satisfies the demographic and eligibility requirements for the product's disability income insurance cover, i.e. consumers:</p> <ul style="list-style-type: none"> • are aged between 18 and 64; 	<p>In target market</p>

Table 7: Consumer's intended disability income insurance cover	Product consistency
<ul style="list-style-type: none"> are not engaged in a hazardous occupation (as defined in the insurance guide for the product); are employed (working at least 15 hours per week) are in Australia; and have Australian residency. 	
The consumer does not satisfy the demographic and eligibility requirements for disability income insurance cover specified in the previous row	Not in target market
The consumer is unlikely to be ever able to obtain a financial benefit from disability income cover	Not in target market

Financial situation of consumer - Accumulation

Life stage of consumer

Table 8: Life stage of consumer	Product consistency
Child (under 18)	Not in target market
Student (18 or over)	In target market
Accumulation (18 to 65)	In target market
Pre-retirement (40 to 65)	In target market
Retired (over 65)*	In target market

*Where a consumer who has retired requires or is recommended as part of personal financial advice an accumulation product that does not pay regular income.

Intended size of investment

Table 9: Consumer's intended investment amount	Product consistency
Less than \$20,000	Not in target market
\$20,000 to \$150,000	In target market
\$150,000 to \$500,000	In target market
Over \$500,000	In target market

Other elements of TMD

Appropriateness requirements

Explanation of consistency of key attributes with TMD
<p>The Issuer has assessed the product and formed the view that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described above. This is because the product:</p> <ul style="list-style-type: none"> • Has been designed for consumers who are seeking to accumulate capital/wealth for their retirement within the superannuation environment; • Provides consumers with the ability to choose from a broad range of investment options, each of which cater for different types of consumers depending on their need for choice; • Provides consumers with insurance options and the ability to tailor an investment portfolio suited to their risk profile and investment timeframe; and • Can only be acquired by a consumer through an approved financial adviser.

Distribution Conditions/Restrictions

The distribution conditions only apply to distribution through dealing.

Distribution channel	Permitted channel?	Distribution conditions in relation to dealing in this product
All channels	No	Not applicable
Direct retail (issuer distributing direct to consumer with no intermediary)	No	Not applicable
To implement personal advice, through an approved financial adviser	Yes	Distributor is required to provide confirmation that they have provided the consumer with personal advice in relation to the product.
Through an approved financial adviser to implement general advice provided to the consumer	No	Not applicable

Distribution channel	Permitted channel?	Distribution conditions in relation to dealing in this product
Default – enrolled via employers	No	Not applicable

Review Triggers

- 1) Where the Issuer of the TMD has determined that any of the following has occurred:
 - a) ASIC reportable significant dealing outside of TMD.
 - b) Significant or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) regarding product design, product availability or any distribution condition where the product issuer considers this reasonably suggests that this TMD is no longer appropriate.
 - c) Material change to key product attributes, terms and/or conditions where the product issuer considers this reasonably suggests that this TMD is no longer appropriate.
 - d) The use of Product Intervention Powers, regulator orders or directions in relation to the distribution of this product where the product issuer considers this reasonably suggests that this TMD is no longer appropriate.
 - e) A significant breach event relating to the design or distribution of this product where the product issuer considers this would reasonably suggest that (i) this product is unsuitable for a particular cohort of consumers and (ii) the TMD may no longer be appropriate.
 - f) The issuing of a Significant Event Notice for this product where the product issuer considers this reasonably suggests that this TMD is no longer appropriate.
- 2) A significant reduction in insurance claims ratios, a significant increase in denied insurance claims, a significant increase in withdrawn insurance claims or a significant increase in insurance cancellations that reasonably suggests that this TMD is no longer appropriate.
- 3) The trustee of this product makes a determination for purposes of section 52(9) of Superannuation Industry (Supervision) Act 1993 that the financial interests of the consumers who hold this product are not being promoted.

Maximum period for reviews

Review periods	Maximum period for review
Initial review	1 year and 3 months from the issue date of this TMD
Subsequent review	3 years, 3 months from the period starting from the previous TMD review

Distributor Information Reporting Requirements

Regulated person(s)	Requirement	Reporting deadline
All distributors	Complaints (as defined in section 994A(1) of the Act) relating to the product. The distributor should provide all the content of the complaint, having regard to privacy law.	Quarterly*
All distributors	<p>Significant dealing outside of target market under s994F(6) of the Act.</p> <p>From time to time, the Issuer reserves the right to accept an application for investment from an advised investor who intends to make an initial investment of less than \$20,000, notwithstanding that such investors are not in the target market. For the avoidance of doubt, the Issuer confirms that such dealings should not be taken to be a significant dealing and do not need to be reported to the Issuer.</p>	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.

* Quarterly reporting is due as soon as practicable, but no later than 10 business days after the end of the calendar quarter.

If practicable, distributors should adopt the FSC data standards for reports to the Issuer. Distributors must report to the Issuer via email - ddo@hub24.com.au.

Definitions

In some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Consumer's intended product use (% of Investable Assets)	
Solution/ Standalone (up to 100%)	The consumer may hold the investment option as up to 100% of their total <i>superannuation investment</i> . The consumer is likely to seek an option with <i>very high</i> portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment option as up to 75% of their total <i>superannuation investment</i> . The consumer is likely to seek an option with at least <i>high</i> portfolio diversification.
Core Component (up to 50%)	The consumer may hold the investment option as up to 50% of their total <i>superannuation investment</i> . The consumer is likely to seek an option with at least <i>medium</i> portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment option as up to 25% of their total <i>superannuation investment</i> . The consumer is likely to seek a product an option with at least <i>low</i> portfolio diversification.
Satellite allocation (up to 10%)	The consumer may hold the investment option as up to 10% of the total <i>superannuation investment</i> . The consumer may seek an option with <i>very low</i> portfolio diversification. Options classified as <i>extremely high</i> risk are likely to meet this category only.
Superannuation investment	The total value of the investor's superannuation investment holdings.
Portfolio diversification (for completing the option attribute section of consumer's intended product use) Note: exposures to cash and cash-like instruments may sit outside the diversification framework below.	

Very low	The option provides exposure to a single asset (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).
Low	The option provides exposure to a small number of holdings (for example, fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, a single major commodity (e.g. gold) or equities from a single emerging market economy).
Medium	The option provides exposure to a moderate number of holdings (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).
High	The option provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asset classes, sectors or geographic markets (for example, global equities).
Very high	The option provides exposure to a large number of holdings across a broad range of asset classes, sectors and geographic markets with limited correlation to each other.
Consumer's intended investment timeframe	
Minimum	The minimum suggested timeframe for holding the option. Typically, this is the rolling period over which the investment objective of the option is likely to be achieved.
Consumer's Risk (ability to bear loss) and Return profile	

This TMD uses the Standard Risk Measure (**SRM**) to estimate the likely number of negative annual returns for an option over a 20 year period, using the guidance and methodology outlined in the **Standard Risk Measure Guidance Paper For Trustees** (note the bands in the SRM guidance differ from the bands used in this TMD). However, SRM is not a complete assessment of risk and potential loss. For example, it does not detail important issues such as the potential size of a negative return (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some options may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating.

A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.

Low	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a conservative or low risk appetite; • seeks to minimise volatility and potential losses (e.g. has the ability to bear up to 1 negative return over a 20 year period (SRM 1 to 2)); and • is comfortable with a low target return profile. <p>The consumer typically prefers stable, defensive assets (such as cash).</p>
Medium	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a moderate or medium risk appetite; • seeks low volatility and potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)); and • is comfortable with a moderate target return profile. <p>The consumer typically prefers defensive assets (for example, fixed income).</p>

High	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a high risk appetite; • can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)); and • seeks high returns (typically over a medium or long timeframe). <p>The consumer typically prefers growth assets (for example, shares and property).</p>
Very high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a very high risk appetite; • can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)); and • seeks to maximise returns (typically over a medium or long timeframe). <p>The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).</p>
Extremely high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has an extremely high risk appetite; • can accept significant volatility and losses; and • seeks to obtain accelerated returns (potentially in a short timeframe). <p>The consumer seeks extremely high risk, speculative or complex options which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes (for example, crypto-assets or collectibles).</p>

Consumer’s need to access capital

This consumer attribute addresses the likely period of time between the making of a request for redemption/withdrawal of capital by the consumer (or access to investment proceeds more generally) and the crediting of proceeds from this request in the consumer’s account under ordinary circumstances. Issuers should consider both the frequency for accepting the request and the length of time to accept, process and credit the proceeds of such a request. To the extent that the liquidity of the underlying investments or possible liquidity constraints (e.g. ability to stagger or delay redemptions) could impact this, this is to be taken into consideration in aligning the option to the consumer’s need to access capital. Where access to investment proceeds from the option is likely to occur through a secondary market, the liquidity of the market for the option should be considered.

Distributor Reporting

Significant dealings

Section 994F(6) of the Act requires distributors to notify the issuer if they become aware of a significant dealing in the product that is not consistent with the TMD. Neither the Act nor ASIC defines when a dealing is ‘significant’ and distributors have discretion to apply its ordinary meaning.

The issuer will rely on notifications of significant dealings to monitor and review the product, this TMD, and its distribution strategy, and to meet its own obligation to report significant dealings to ASIC.

Dealings outside this TMD may be significant because:

- they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or
- they constitute an individual transaction which has resulted in, or will or is likely to result in, significant detriment to the consumer (or class of consumers).

In each case, the distributor should have regard to:

- the nature and risk profile of the product (which may be indicated by the product’s risk rating or withdrawal timeframes),
- the actual or potential harm to a consumer (which may be indicated by the value of the consumer’s investment, their intended product use or their ability to bear loss), and

	the nature and extent of the inconsistency of distribution with the TMD (which may be indicated by the number of red and/or amber ratings attributed to the consumer).
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Target Market Determination for ARA Super - Pension

Introduction

This Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth (Act)). This TMD describes the class of consumers that comprises the target market for the financial product and matters relevant to the product's distribution and review (specifically, distribution conditions, review triggers and periods, and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the product being consistent with the most recent TMD (unless the distribution is excluded conduct).

This document is **not** a product disclosure statement (PDS) and is **not** a complete summary of the product features or terms of the product. This document does not take into account any person's individual objectives, financial situation or needs and does not contain any financial product advice. Persons interested in acquiring this product should carefully read the PDS for the product and any supplementary disclosure documents for the product before making any decisions about whether to acquire this product.

Important terms used in this TMD are defined in the TMD Definitions which supplement this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained online via InvestorHUB or via your Financial Adviser.

Product and issuer identifiers

Name of product	ARA Super - Pension ('the product')
Issuer name	HTFS Nominees Pty Limited (Issuer)
Issuer ABN	78 000 880 553
Issuer AFSL	232 500
TMD issue date	10 November 2023
TMD Version	2
Distribution status of product	Available
Fund name	HUB24 Super Fund (Fund)
Fund ABN	60 910 190 523
USI code	60 910 190 523 001

Product description and Key attributes

Product description	This is a superannuation product for individuals to hold wealth and provide income during retirement.
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	This product is not a self-managed super fund.
Key product attributes	<ul style="list-style-type: none"> • This product: <ul style="list-style-type: none"> • Has investment options/choices for a consumer to make. • Provides members with the option to select from three investment menus with different fee structures, allowing them to tailor a portfolio, with their adviser, that meets their individual needs and objectives. Consumers may switch between these investment menus if and as their objectives, financial situation and needs change. • Depending on the arrangement between us, your adviser or your adviser's licensee you may have access to the below investment options and fees that relate to the Discover Menu and the Core Menu. <p><u>Investment Menu</u></p> <p>ARA Super may be suitable for members who are looking for an investment menu that includes:</p> <ul style="list-style-type: none"> • Managed funds and • Term deposit products. <ul style="list-style-type: none"> • Online access - there are a range of different types of reports available which allows consumers to track and monitor their account. These include, but are not limited to: <ul style="list-style-type: none"> • Portfolio valuation, • Investment performance • Income and expenses, and • Annual Statements. • Drawdown rules. • Concessional tax treatment. • Product options for members who are receiving personal financial advice.

Description of Target Market

The Target Market is the class of persons who are the type of consumer set out below, who have the needs and objectives set out below and are in the financial situation set out below.

TMD indicator key

The Consumer Attributes for which the product is likely to be appropriate have been assessed using a red and green rating methodology:

In target market	Not in target market
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Instructions

In the tables below, Column 1 indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering the product. Column 2 indicates whether a consumer meeting the attribute in column 1 is likely to be in the target market for the product.

Consumer objectives

For an individual consumer, this product is likely to be consistent with any one or more of the following short term and long term objectives:

- to hold capital/wealth during retirement
- to provide a source of income during retirement
- to provide an environment for concessional taxation of savings

Level of decision making

Table 1: Consumer's intended level of decision making	Product consistency
Fully self-managed, including fund administration	Not in target market
Investments chosen by consumer from extensive investment menu, with administration provided by the Issuer	In target market
Investments chosen by consumer from limited investment menu, with administration provided by the Issuer	In target market
Default investment strategy applied where no investments selection is made. Administration is provided by the Issuer	Not in target market

Product investment menu

Table 2: Consumer's intended type of investment products on the investment menu	Product consistency
Ready-made Diversified Portfolio solutions to suit a range of risk/return profiles from low to high	

Table 2: Consumer's intended type of investment products on the investment menu	Product consistency
Sector specific options	In target market
Sub-sector specific options	In target market
Alternative investment options	In target market
Active investment options <ul style="list-style-type: none"> No manager choice 	Not in target market
Active investment options <ul style="list-style-type: none"> Some manager choice 	In target market
Active investment options <ul style="list-style-type: none"> Wide manager choice 	In target market
Passive investment options, such as passive Exchange traded funds	Not in target market
Ready-made diversified portfolio options	Not in target market
Term deposit options	In target market
Direct share options	Not in target market
Separately managed accounts	Not in target market
Cash management account	In target market
Longevity product options	Not in target market
Capital preservation options	In target market

Number of investment holdings

Table 3: Consumer's intended holding of multiple investment options/strategies	Product consistency
Low – consumer intends to hold no more than 5 investment options	In target market
Medium – consumer intends to hold between 5 and 15 investment options	In target market
High – consumer intends to hold more than 15 investment options	In target market

Financial Advice

Table 4: Consumer's desired availability of financial advice	Product consistency
Consumer wishes to have the option to receive comprehensive personal financial advice in relation to the product.	In target market
Consumer wishes to receive personal financial advice through the Fund that relates to the consumer's interest in the product.	Not in target market

Table 4: Consumer's desired availability of financial advice	Product consistency
Consumer does not wish to have the option to receive financial advice in relation to the product.	Not in target market
Consumer wishes to have the option to authorise an external financial adviser to assist in managing the consumer's interest in the product.	In target market

Financial situation of consumer – Retirement and Transition to Retirement

Life stage of consumer

Table 5: Life stage of consumer	Product consistency
Consumer has met at least one condition of release and wishes to commence a retirement income stream.	In target market
Consumer has not met a condition of release.	Not in target market
Consumer does not wish to commence a retirement income stream.	Not in target market

Intended size of investment

Table 6: Consumer's intended investment amount	Product consistency
Less than \$20,000	Not in target market
\$20,000 to \$150,000	In target market
\$150,000 to \$500,000	In target market
Over \$500,000	In target market

Other elements of TMD

Appropriateness requirements

Explanation of consistency of key attributes with TMD

The Issuer has assessed the product and formed the view that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described above. This is because the product:

- Has been designed for consumers who are seeking to hold capital/wealth for their retirement within the superannuation environment;
- Provides consumers with the ability to choose from a broad range of investment options, each of which cater for different types of consumers depending on their need for choice;
- Provides consumers with the ability to tailor an investment portfolio suited to their risk profile and investment timeframe; and
- Can only be acquired by a consumer through an approved financial adviser.

Distribution Conditions/Restrictions

The distribution conditions only apply to distribution through dealing.

Distribution channel	Permitted channel?	Distribution conditions in relation to dealing in this product
All channels	No	Not applicable
Direct retail (issuer distributing direct to consumer with no intermediary)	No	Not applicable
To implement personal advice, through an approved financial adviser	Yes	Distributor is required to provide confirmation that they have provided the consumer with personal advice in relation to the product.
Through an approved financial adviser to implement general advice provided to the consumer	No	Not applicable
Default – enrolled via employers	No	Not applicable

Review Triggers

- 1) Where the Issuer of the TMD has determined that any of the following has occurred:

- a) ASIC reportable significant dealing outside of TMD.
 - b) Significant or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) regarding product design, product availability or any distribution condition where the product issuer considers this reasonably suggests that this TMD is no longer appropriate.
 - c) Material change to key product attributes, terms and/or conditions where the product issuer considers this reasonably suggests that this TMD is no longer appropriate.
 - d) The use of Product Intervention Powers, regulator orders or directions in relation to the distribution of this product where the product issuer considers this reasonably suggests that this TMD is no longer appropriate.
 - e) A significant breach event relating to the design or distribution of this product where the product issuer considers this would reasonably suggest that (i) this product is unsuitable for a particular cohort of consumers and (ii) the TMD may no longer be appropriate.
 - f) The issuing of a Significant Event Notice for this product where the product issuer considers this reasonably suggests that this TMD is no longer appropriate.
- 2) The trustee of this product makes a determination for purposes of s52(9) of Superannuation Industry (Supervision) Act 1993 that the financial interests of the consumers who hold this product are not being promoted.

Maximum period for reviews

Review periods	Maximum period for review
Initial review	1 year and 3 months from the issue date of this TMD
Subsequent review	3 years, 3 months from the period starting from the previous TMD review

Distributor Information Reporting Requirements

Regulated person(s)	Requirement	Reporting deadline
All distributors	Complaints (as defined in section 994A(1) of the Act) relating to the product. The distributor should provide all the content of the	Quarterly*

	complaint, having regard to privacy law.	
All distributors	<p>Significant dealing outside of target market under s994F(6) of the Act.</p> <p>From time to time, the Issuer reserves the right to accept an application for investment from an advised investor who intends to make an initial investment of less than \$20,000, notwithstanding that such investors are not in the target market. For the avoidance of doubt, the Issuer confirms that such dealings should not be taken to be a significant dealing and do not need to be reported to the Issuer.</p>	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.

* Quarterly reporting is due as soon as practicable, but no later than 10 business days after the end of the calendar quarter.

If practicable, distributors should adopt the FSC data standards for reports to the Issuer. Distributors must report to the Issuer via email - ddo@hub24.com.au.

Definitions

In some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Consumer's intended product use (% of Investable Assets)	
Solution/ Standalone (up to 100%)	<p>The consumer may hold the investment option as up to 100% of their total <i>superannuation investment</i>.</p> <p>The consumer is likely to seek an option with <i>very high</i> portfolio diversification.</p>
Major allocation (up to 75%)	<p>The consumer may hold the investment option as up to 75% of their total <i>superannuation investment</i>.</p> <p>The consumer is likely to seek an option with at least <i>high</i> portfolio diversification.</p>

Core Component (up to 50%)	<p>The consumer may hold the investment option as up to 50% of their total <i>superannuation investment</i>.</p> <p>The consumer is likely to seek an option with at least <i>medium</i> portfolio diversification.</p>
Minor allocation (up to 25%)	<p>The consumer may hold the investment option as up to 25% of their total <i>superannuation investment</i>.</p> <p>The consumer is likely to seek a product an option with at least <i>low</i> portfolio diversification.</p>
Satellite allocation (up to 10%)	<p>The consumer may hold the investment option as up to 10% of the total <i>superannuation investment</i>.</p> <p>The consumer may seek an option with <i>very low</i> portfolio diversification.</p> <p>Options classified as <i>extremely high</i> risk are likely to meet this category only.</p>
Superannuation investment	The total value of the investor's superannuation investment holdings.
<p>Portfolio diversification (for completing the option attribute section of consumer's intended product use)</p> <p>Note: exposures to cash and cash-like instruments may sit outside the diversification framework below.</p>	
Very low	The option provides exposure to a single asset (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).
Low	The option provides exposure to a small number of holdings (for example, fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, a single major commodity (e.g. gold) or equities from a single emerging market economy).
Medium	The option provides exposure to a moderate number of holdings (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).
High	The option provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asset classes, sectors or geographic markets (for example, global equities).

Very high	The option provides exposure to a large number of holdings across a broad range of asset classes, sectors and geographic markets with limited correlation to each other.
Consumer's intended investment timeframe	
Minimum	The minimum suggested timeframe for holding the option. Typically, this is the rolling period over which the investment objective of the option is likely to be achieved.
Consumer's Risk (ability to bear loss) and Return profile	
<p>This TMD uses the Standard Risk Measure (SRM) to estimate the likely number of negative annual returns for an option over a 20 year period, using the guidance and methodology outlined in the <i>Standard Risk Measure Guidance Paper For Trustees</i> (note the bands in the SRM guidance differ from the bands used in this TMD). However, SRM is not a complete assessment of risk and potential loss. For example, it does not detail important issues such as the potential size of a negative return (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some options may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating.</p> <p>A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>	
Low	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a conservative or low risk appetite; • seeks to minimise volatility and potential losses (e.g. has the ability to bear up to 1 negative return over a 20 year period (SRM 1 to 2)); and • is comfortable with a low target return profile. <p>The consumer typically prefers stable, defensive assets (such as cash).</p>

Medium	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a moderate or medium risk appetite; • seeks low volatility and potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)); and • is comfortable with a moderate target return profile. <p>The consumer typically prefers defensive assets (for example, fixed income).</p>
High	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a high risk appetite; • can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)); and • seeks high returns (typically over a medium or long timeframe). <p>The consumer typically prefers growth assets (for example, shares and property).</p>
Very high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a very high risk appetite; • can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)); and • seeks to maximise returns (typically over a medium or long timeframe). <p>The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).</p>
Extremely high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has an extremely high risk appetite; • can accept significant volatility and losses; and • seeks to obtain accelerated returns (potentially in a short timeframe). <p>The consumer seeks extremely high risk, speculative or complex options which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes (for example, crypto-assets or collectibles).</p>

Consumer's need to access capital

This consumer attribute addresses the likely period of time between the making of a request for redemption/withdrawal of capital by the consumer (or access to investment proceeds more generally) and the crediting of proceeds from this request in the consumer's account under ordinary circumstances. Issuers should consider both the frequency for accepting the request and the length of time to accept, process and credit the proceeds of such a request. To the extent that the liquidity of the underlying investments or possible liquidity constraints (e.g. ability to stagger or delay redemptions) could impact this, this is to be taken into consideration in aligning the option to the consumer's need to access capital. Where access to investment proceeds from the option is likely to occur through a secondary market, the liquidity of the market for the option should be considered.

Distributor Reporting

Significant dealings

Section 994F(6) of the Act requires distributors to notify the issuer if they become aware of a significant dealing in the product that is not consistent with the TMD. Neither the Act nor ASIC defines when a dealing is 'significant' and distributors have discretion to apply its ordinary meaning.

The issuer will rely on notifications of significant dealings to monitor and review the product, this TMD, and its distribution strategy, and to meet its own obligation to report significant dealings to ASIC.

Dealings outside this TMD may be significant because:

- they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or
- they constitute an individual transaction which has resulted in, or will or is likely to result in, significant detriment to the consumer (or class of consumers).

In each case, the distributor should have regard to:

- the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes),
- the actual or potential harm to a consumer (which may be indicated by the value of the consumer's investment, their intended product use or their ability to bear loss), and

	the nature and extent of the inconsistency of distribution with the TMD (which may be indicated by the number of red and/or amber ratings attributed to the consumer).
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