

# Target Market Determination

For Smartsave Smart Pensions - Pension account issued by  
Diversa Trustees Limited (ABN 49 006 421 638)  
(USI 43 905 581 638 001)

## Introduction

This document provides guidance in relation to Target Market Determinations (TMD) for the purposes of the Design and Distribution Obligations (DDO) under the Corporations Act 2001 (Cth) (Act). This TMD is required under section 994B of the Act and sets out the class of consumers (Target Class) for whom the Smartsave Smart Pensions - Pension account (Product) would likely be consistent with their likely objectives, financial situation and needs having regard to the Product's key attributes. This TMD is required to outline the triggers to review the Target Market and certain other information. It forms part of Diversa Trustees Limited's (the Trustee) design and distribution arrangements for the Product.

## Definitions

**ASX** means Australian Securities Exchange.

**Distributor(s)** means a 'regulated person', as defined in s994A(1) of the Corporations Act 2001.

**Issuer(s)** means a person who is subject to the TMD requirements in s994B of the Corporations Act 2001 (including sellers in a regulated sale situation), unless indicated otherwise.

**TMD** means Target Market Determination.

**PDS** means Product Disclosure Statement.

**Product** means Smartsave Smart Pension - Pension account, a sub-plan of OneSuper ABN 43 905 581 638 RSE R1001341 that is issued by Diversa Trustees Limited ABN 49 006 421 638, AFSL No 235153 RSE Licence No L0000635.

## 1. About this document

### When to use this target market determination

This TMD seeks to offer consumers, financial advisers, promoter and staff with an understanding of the class of consumers for which this Product has been designed, having regard to the objectives, financial situation and needs of the target market.

This document is not to be treated as a full summary of the Product's risks and features and is not intended to provide financial advice. Consumers must refer to the Product Disclosure Statement (PDS) and any supplementary documents when making a decision about this Product.

### Product Disclosure Statement to which this target market determination applies

This TMD applies to *Smart Pensions - Pension account* referred to in the following *Product Disclosure Statement (PDS)* and *PDS Guides*:

- [Smartsave Personal Choice and Smart Pensions Product Disclosure Statement](#)
- [Smartsave Additional Information Guide](#)

## Important Dates

Date from which this target market determination was <b>last reviewed</b>	30 September 2022
Date from which this target market determination is <b>effective</b>	22 September 2023
Date when this target market determination will be <b>next reviewed</b>	22 September 2024

## 2. Class of consumers that fall within this target market

Consumers can access the Pension account through Smart Pensions offered by Smartsave, a sub-plan of OneSuper ABN 43 905 581 638 RSE R1001341.

The information below summarises the overall class of consumers that fall within the target market for Smart Pensions - Pension account, based on the Product key attributes and the objectives, financial situation and needs that it has been designed to meet.

Smart Pensions - Pension account has been designed for consumers whose likely objectives, financial situation and needs (as listed below) are aligned with the Product (including the key attributes). This Product is designed for consumers who:

- Have attained the age of 65, or
- Are seeking a pension income and have permanently retired before age 65 having met their preservation age or another condition of release that has a nil cashing restriction,
- Require an income stream,
- Have a minimum of \$20,000 to invest,
- Are seeking a regulated superannuation scheme which offers a diverse range of premixed pooled investment options,
- Are aware of and able to tolerate the investment risk, volatility, and investment time horizons (short, medium or long term) of the investment strategy nominated,
- Are able to bear losses having regard to the investment strategy selected,
- Are seeking to engage with a digital platform that provides access to their account via an on-line secure portal, and
- Are either investing directly or through a financial adviser.

### Excluded class of consumers

This Product is not designed for consumers who:

- Are looking for a super accumulation account,
- Want to contribute to their super account,
- Are looking for insurance,
- Want a self-managed super fund (SMSF), or
- Are looking to directly invest in investment options such as ASX listed securities, exchange traded funds (ETFs), listed investment companies (LICs), managed funds, model portfolios and term deposits.

### Product description and key attributes

The key eligibility requirements and product attributes of Smart Pensions - Pension accounts are:

#### Key eligibility requirements

- It is available to consumers who have superannuation balances that are no longer fully preserved under superannuation law.
- A pension account requires a minimum investment of \$20,000 per account.
- It is available to a consumer seeking to be a member of a public superannuation fund.
- It is for consumers that have a financial adviser or actively engage with their investment directly via an online portal.

## Key attributes (fees, terms and features)

- Ongoing income payments are made to the consumer at the frequency and amount selected by the consumer (Subject to minimum payment requirements).
- It provides additional concessional taxation arrangements that are not available in accumulation or transition to retirement income streams.
- It provides the choice of investing in a diverse range of pre-mixed pooled investment options offering different types and levels of risk, investment objectives, investment time horizons and potential return. These investment options are managed by Mercer Investments (Australia) Limited.
- It provides access to the secure online portal which enables members to track and manage their super online.
- Fees associated with Smart Pensions - Pension account include the following:
  - Administration fees which are charged on the member's average daily balance in their Smart Pensions - Pension account, deducted from the underlying assets of their investment and reflected in the unit price of their investment option,
  - Account keeping fee for a member per account per annum,
  - Adviser service fees if a member is investing in Smart Pensions through a financial adviser.
  - Buy/sell spreads associated with pooled investment options,
  - Investments and costs of underlying investment options,
  - Transaction fees associated with the sale or purchase of assets of the fund other than costs that are recovered by charging a buy/sell spread, and
  - Promoter fees which are paid to OneVue Wealth Services from the administration fees.

Please refer to the [Product Disclosure Statement](#) and [Additional Information Guide](#) for further details about the fees associated with the Product.

## Risk of investing in the product

In consideration of if this Product meets your objectives, financial situation and needs, you will also need to consider the potential risks involved should you decide to acquire the Product. Some of these investment risks may include, but are not limited to:

Capital risk	Market risk	Inflation risk	Settlement risk
Interest rate risk	Exchange rate risk	Derivatives risk	Credit risk
Investment management risk	Emerging market risk	Valuation risk	Leverage risk
Borrowing risk	Liquidity risk	Longevity risk	

For more information on these risks of investing, please refer to part 4 of the [Additional Information Guide](#)

The material relating to the risks of super may change between the time you read this Statement and the day you acquire the product. You should read the important information about the risk level of each investment before making a decision.

## Objectives, financial situation, and needs

The table below sets out the class of members that each pooled investment option within Smart Pensions - Pension account has been designed for.

Investment options	Member's investment objective	Member's investment timeframe	Member's risk (ability to bear loss) and return profile	Member's intended product use (% of Investable Assets)
<b>Pooled investment options</b>				
Cash	This investment option is designed for members who prefer very low risk and a high level of security on their account balance.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 1 year.	This investment option is designed to be suitable for members who want a very low risk option. The estimated likelihood of negative annual returns is less than 0.5 years in 20 years.	If a member has an investment timeframe of at least 1 year and has a very low risk appetite, then this investment option is suitable for use as a standalone investment solution (75-100%).  If a member requires an investment option with a longer investment time frame and is willing to accept medium to high risk, then this investment option should only be used as a core (25-75%) or satellite component (<25%) of their broader portfolio of investments.
Conservative	This investment option is designed for members who seek exposure to mainly defensive assets and can tolerate a moderate level of risk. This option invests predominantly in defensive assets across most asset classes.	This investment option is designed for members with a minimum investment timeframe of at least 4 years.	This investment option is designed to be suitable for members willing to accept medium risk. The estimated likelihood of negative annual returns is 2 to less than 3 in 20 years.	If a member has an investment timeframe of at least 4 years and is willing to accept medium risk, then this investment option is suitable for use as a standalone investment solution (75-100%).  If a member has an investment timeframe of at least 4 years and has either a low or a high risk appetite, then this investment option should only be used as and as a core (25-75%) or satellite component (<25%) of their broader portfolio of investments.
Moderate	This investment option is designed for members who seek exposure to a combination of growth and defensive assets and can tolerate a medium to high level	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 6 years.	This investment option is designed to be suitable for members willing to accept a medium to high level of risk. The estimated likelihood of negative annual returns is 3 to	If a member has an investment timeframe of at least 6 years and is willing to accept medium to high risk, then this investment option is suitable for use as a standalone

Investment options	Member's investment objective	Member's investment timeframe	Member's risk (ability to bear loss) and return profile	Member's intended product use (% of Investable Assets)
	of risk. This option invests predominantly in a mixture of growth and defensive assets across most asset classes.		less than 4 years in 20 years.	investment solution (75-100%). If a member has an investment timeframe of at least 6 years and has either a low or a high risk appetite, then this investment option should only be used as a core (25-75%) or satellite component (<25%) of their broader portfolio of investments.
Growth	This investment option is designed for members who seek exposure to mainly growth assets and can tolerate a high level of risk. This option invests mainly in growth assets across most asset classes.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 8 years.	This investment option is designed to be suitable for members willing to accept high risk. The estimated likelihood of negative annual returns is 4 to less than 6 years in 20 years.	If a member has an investment timeframe of at least 8 years and is willing to accept high risk, then this investment option is suitable for use as a standalone investment solution (75-100%). If a member has an investment timeframe of at least 8 years and a low to medium risk appetite, then this investment option should only be used as a core (25-75%) or satellite component (<25%) of their broader portfolio of investments.
High Growth	This investment option is designed for members who seek exposure to mainly growth assets and can tolerate a high level of risk. This option invests mainly in growth assets across most asset classes.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 10 years.	This investment option is designed to be suitable for members willing to accept high risk. The estimated likelihood of negative annual returns is 4 to less than 6 years in 20 years.	If a member has an investment timeframe of at least 10 years and is willing to accept high risk, then this investment option is suitable for use as a standalone investment solution (75-100%). If a member has an investment timeframe of at least 10 years and a low to medium risk appetite, then this investment option should only be used as a core (25-75%) or satellite component (<25%) of their broader portfolio of investments.

Investment options	Member's investment objective	Member's investment timeframe	Member's risk (ability to bear loss) and return profile	Member's intended product use (% of Investable Assets)
Australian Shares	This investment option is designed for members who seek exposure to a broad range of companies listed on the Australian Stock Exchange across large and small capitalisation companies with a mix of index and active management.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 7 years.	This investment option is designed to be suitable for members willing to accept high risk. The estimated likelihood of negative annual returns is 4 to less than 6 years in 20 years.	<p>If a member has an investment timeframe of at least 7 years and is willing to accept high risk, then this investment option is suitable for use as a standalone investment solution (75-100%).</p> <p>If a member has an investment timeframe of at least 7 years and a low to medium risk appetite, then this investment option should only be used as a core (25-75%) or satellite component (&lt;25%) of their broader portfolio of investments.</p>
International Shares	This investment option is designed for members who seek exposure to companies listed on international exchanges across developed and emerging markets with a mix of index and active management.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 7 years.	This investment option is designed to be suitable for members willing to accept high risk. The estimated likelihood of negative annual returns is 4 to less than 6 years in 20 years.	<p>If a member has an investment timeframe of at least 7 years and is willing to accept high risk, then this investment option is suitable for use as a standalone investment solution (75-100%).</p> <p>If a member has an investment timeframe of at least 7 years and a low to medium risk appetite, then this investment option should only be used as a core (25-75%) or satellite component (&lt;25%) of their broader portfolio of investments.</p>
Australian Listed Property	This investment option is designed for members who seek exposure to property related listed companies in Australia.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 7 years.	This investment option is designed to be suitable for members willing to accept high risk. The estimated likelihood of negative annual returns is 4 to less than 6 years in 20 years.	<p>If a member has an investment timeframe of at least 7 years and is willing to accept high risk, then this investment option is suitable for use as a standalone investment solution (75-100%).</p> <p>If a member has an investment timeframe of at least 7 years and a low to medium risk appetite, then this investment option should only be used as</p>

Investment options	Member's investment objective	Member's investment timeframe	Member's risk (ability to bear loss) and return profile	Member's intended product use (% of Investable Assets)
				a core (25-75%) or satellite component (<25%) of their broader portfolio of investments.
Australian Fixed Interest	This investment option is designed for members who seek exposure to primarily Australian fixed interest securities, generating income with some capital growth potential over the long term.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 7 years.	This investment option is designed to be suitable for members willing to accept a medium to high level of risk. The estimated likelihood of negative annual returns is 3 to less than 4 years in 20 years.	<p>If a member has an investment timeframe of at least 7 years and is willing to accept medium to high risk, then this investment option is suitable for use as a standalone investment solution (75-100%).</p> <p>If a member has an investment timeframe of at least 7 years and a low to medium risk appetite, then this investment option should only be used as a core (25-75%) or satellite component (&lt;25%) of their broader portfolio of investments.</p>
International Fixed Interest (Hedged)	This investment option is designed for members who seek exposure to primarily global fixed interest securities, generating income with some capital growth potential over the long term.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 7 years.	This investment option is designed to be suitable for members willing to accept high risk. The estimated likelihood of negative annual returns is 4 to less than 6 years in 20 years.	<p>If a member has an investment timeframe of at least 7 years and is willing to accept high risk, then this investment option is suitable for use as a standalone investment solution (75-100%).</p> <p>If a member has an investment timeframe of at least 7 years and a low to medium risk appetite, then this investment option should only be used as a core (25-75%) or satellite component (&lt;25%) of their broader portfolio of investments.</p>

Further details about these pooled investment options can be found in the Smartsave [Additional Information Guide](#).

## Consistency between target market and the Product

Smart Pensions - Pension account is likely to be consistent with the likely objectives, financial situation and needs of the class of members in the target market because:

- To open a pension account, a member must warrant to us that they meet the eligibility requirements (aged 65, or reached preservation age and permanently retired, or recipient of a death benefit as an income stream, or no longer in paid employment due to total and permanent disablement, or ceased an employment arrangement on or after age 60) or otherwise have met a legislated condition of release with a nil cashing restriction,
- The insurance requirements for members of this demographic are considered low (unlike younger age groups who are more likely to be funding 'raising a family' expenses and mortgages; also, there will be a meaningful proportion of members no longer working, so do not need to insure against income loss),
- The member will no longer be working, and therefore requiring an income stream for living expenses, and
- The member can only invest in pre-mixed pooled investment options.

## 3. How this Product is to be distributed

### Distribution channels

Smart Pensions - Pension account been designed to be distributed through the following means:

- Through a financial adviser registered with OneVue Wealth, and
- Available for investment directly online by members through <https://onesuper.com/funds/smartsave/>.

### Distribution conditions

Smart Pensions - Pension account should only be distributed under the following circumstances:

- If distributed through a financial adviser, the adviser must first be registered with OneVue Wealth,
- If the minimum investment by pension consumers is at least \$20,000,
- If the consumer does not require insurance cover through their pension account,
- The consumer will draw an income stream of at least the minimum amount required, at least annually, and
- The consumer meets at least one of the conditions of release:
  - preservation age & permanently retired,
  - aged 65,
  - recipient of a death benefit as an income stream,
  - no longer in paid employment due to total and permanent disablement, or
  - ceased an employment arrangement on or after age 60.

### Adequacy of distribution conditions and restrictions

- This Product can be distributed to consumers as part of personal advice recommendations.
- For consumers investing directly without an adviser, a number of questions are asked in the application form to sign up to the Product. These questions seek to ensure that the distribution conditions (including criteria for conditions of release) are met, therefore making it likely that consumers who invest in the product are in the class of members for which it has been designed for.
- For consumers investing, drawing an income stream is a common term for a pension account.
- The demographic that applies (i.e. meeting eligibility criteria) results in a requirement by consumers for an income stream because of reduced or no other forms of personal income.
- The requirements for insurance are reduced or nil based on consumers reduced or no personal income, expected retirement of mortgages and lower likelihood of material expenses in raising a family.



This is based on an assessment of the distribution conditions and restrictions and that they are appropriate and will assist distribution in being directed towards the target market for whom the Product has been designed.

#### 4. Reviewing this target market determination

We will review this target market determination in accordance with the below:

<b>Periodic review</b>	Assessment on an ongoing basis in line with the review triggers and events below with a detailed annual review
<b>Review triggers or events</b>	<p>Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited to):</p> <ul style="list-style-type: none"><li>• a material change to the design or distribution of the product, including related documentation,</li><li>• occurrence of an ASIC significant dealing,</li><li>• significant change in metrics, including but not limited to<ul style="list-style-type: none"><li>• increase in investment option switching,</li><li>• increase in members exiting the Product,</li><li>• increase in member complaints about investment performance of pooled investment options or this Product in general.</li></ul></li><li>• fails to achieve member outcomes,</li><li>• distribution conditions found to be inadequate,</li><li>• external events such as adverse media coverage or regulatory attention, and</li><li>• a change occurs that affects the likely objectives, financial situation or needs of the target market.</li></ul>

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

#### 5. Reporting and monitoring this target market determination

We may collect the following information from our distributors in relation to this TMD.

<b>Complaints</b>	<p>Distributors must report all complaints in relation to the product(s) covered by this TMD on a monthly basis. *</p> <p>This will include the substance of complaints and general feedback relating to the Product and its performance.</p>
<b>Significant dealings</b>	<p>Distributors must report if they become aware of a significant dealing in relation to this TMD as soon as possible and no later than within 10 business days.</p> <p>A significant dealing includes:</p> <ul style="list-style-type: none"><li>○ 20% of members who have invested in the Product but are not in the target market, including the proportion of members who are part of a class of members that have been specifically excluded from the target market,</li><li>○ Potential/actual harm to members if members outside the target market acquire the Product, and</li><li>○ Time period when members outside the target market invested in the Product.</li></ul> <p>Distributors will report transaction data and outcomes from sale practices monitoring within quarterly reporting period within 10 business days following the end of the quarter.</p>

\*within 10 days of the end of the calendar month