

# **Target Market Determination - Funds Management**

# Legal disclaimer

This Target Market Determination (**TMD**) is required under section 994B of the Corporations Act 2001 (Cth) (**the Act**). It sets out the class of consumers for whom the product, including its key attributes, would likely be consistent with their likely objectives, financial situation, and needs. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of Responsible Entity Partner Limited's (**the Issuer**) design and distribution arrangements for the product.

This document is not a product disclosure statement. It is not a summary of the product features or terms of the product. This document does not consider any person's objectives, financial situation or needs. Persons interested in acquiring this product should carefully read the Product Disclosure Statement (**PDS**) for the Fund before deciding whether to buy 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 at www.certane.com/documents or by contacting the Fund Administrator on 1800 226 174.

# **Target Market Summary**

This product is likely to be appropriate for a consumer seeking Capital Growth to be used as a small allocation of up to 25% within a portfolio where the consumer has a Long investment timeframe, High or Very High risk/return profile.

# **Fund and Issuer identifiers**

Issuer	Responsible Entity Partners Limited
Issuer ABN	11 119 757 596
Issuer AFSL	304542
Fund	Willian Blair Global Leaders Fund - A Class
ARSN	644 462 420
APIR Code	LAM9219AU
Date TMD approved	29 March 2022
TMD Version	Version 1.0
TMD Status	Available

# **Description of Target Market**

## TMD indicator key

The Consumer Attributes for which the product is likely to be appropriate have been assessed using a red/amber/green rating methodology with appropriate colour coding:

In target market	Potentially in target market	Not considered in target market
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Generally, a consumer is unlikely to be in the target market for the product if:

- one or more of their Consumer Attributes correspond to a red rating, or
- three or more of their Consumer Attributes correspond to an amber rating.

# Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (typically with an intended product use of *satellite/small allocation* or *core component*). In such circumstances, the product should be assessed against the consumer's attributes for the relevant portion of the portfolio rather than the consumer's portfolio as a whole. For example, a consumer may seek to construct a conservative portfolio with a satellite/small allocation to growth assets. In this case, it may be likely that a product with a *High* or *Very High* risk/return profile is consistent with the consumer's objectives for that allocation, notwithstanding that the risk/return profile of the consumer as a whole is *Low* or *Medium*. In making this assessment, distributors should consider all product features (including key attributes).

Consumer Attributes	TMD Indicator	Product description including key attributes
Consumer's investment object	tive	
Capital Growth		The Fund is suitable for a client who wishes to invest in a fund comprised of a diversified portfolio of international equity
Capital Preservation		securities issued by companies with high growth, profitability, and quality characteristics.
Capital Guaranteed		The Fund is suitable for a client that is seeking capital growth.
Income Distribution		Investment in the Fund does not guarantee a profit or protect against loss.
		The Fund does not provide high income with regular distributions.
Consumer's intended product	use (% of Investable Ass	ets)
Solution/Standalone (75-100%)		To reduce the overall investment risk, investors should have a diversified portfolio, with exposure to different funds,
Core Component (25–75%)		assets, or asset classes.
		The Fund is not intended to be used as a
Satellite (<25%)		standalone product or investment.

Consumer's investment timeframe		
Short (≤ 2 years)		The Fund is suitable for a client looking to invest in a fund with a minimum suggested
Medium (2-5 years)		investment timeframe of 5 years.
Long (> 5 years)		
Consumer's risk (ability to bea	ır loss) and return profile	
Low		The Fund is classified high-risk due to its exposure to a diversified portfolio of
Medium		international equities. When used as a satellite allocation of their total investment
High		portfolio, it may be appropriate for investors with a Low to Medium risk profile.
Very High		
Consumer's need to withdraw	money	
Daily		Applications for withdrawals are usually processed within six business days.
Weekly		Once processed, funds will be returned to the nominated account within a maximum
Monthly		of 21 days.
Quarterly		
Annually or longer		

# **Appropriateness**

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, with the attributes identified with a green TMD Indicator.

# **Distribution**Distribution conditions/restrictions

Distribution channel	Distribution condition and rationale
Direct	Direct investors who are wholesale or sophisticated investors can invest in the Fund. Retail clients cannot invest in the Fund unless they receive personal financial product advice in relation to the Fund (Personal Financial Advice).
Platform/Wrap	Retail clients cannot invest in the Fund unless they receive Personal Financial Advice in relation to the Fund.
Adviser	The Fund may be distributed to investors by a Licensee or their Authorised Representative (known as a financial adviser) who provides Personal Financial Advice in relation to the Fund. A financial adviser must consider the Issuer's TMD before providing Personal Financial Advice in relation to the Fund.

# **Review triggers**

Event	Conditions
Significant product change	A material change to key attributes, fund investment objective or fees.
Fund performance	The Fund has significantly and persistently not achieved its investment objectives.
Complaints	A significant number, or an unexpectedly high number, of complaints about the Fund or its distribution.
Significant dealings	Determination by the Issuer of an ASIC reportable Significant Dealing outside the TMD.
Regulator intervention	The use of Product Intervention Powers, regulator orders or directions that affect the Fund.

# Mandatory review periods

Review period	The maximum period for review
Initial review	One year and three months
Subsequent review	Three years and three months

## Distributor reporting requirements

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Act) relating to the product design, product availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	Within ten business days following the end of a calendar quarter.	All distributors
Significant dealing outside of target market, under s994F(6) of the Act.	As soon as practicable but no later than ten business days after the distributor becomes aware of the significant dealing.	All distributors
To the extent a distributor is aware, dealings outside the target market, including why the acquisition is outside of the target market, and whether acquisition occurred under personal advice.	Within ten business days following the end of a calendar quarter.	All distributors
Other information requested by the Issuer to meet its design and distribution obligations.	As soon as practical.	All distributors

Distributors must report to the Issuer by emailing to ddoreporting@certane.com.

### Disclaimer

Issued by Responsible Entity Partners Limited ABN 11119757596 AFSL 304542 (**the Issuer**). Registered office: Level 9 Podium, 530 Collins Street, Melbourne VIC 3000.

No person is authorised by the Issuer to give information or make representations in connection with this Fund that is not contained in the PDS or this TMD. Information or representations not contained in the PDS or this TMD may not be relied on as having been authorised by the Issuer, its directors, or any other person in connection with the Offer. The Fund's business, financial condition, operations, and prospects may have changed since the date of the PDS or this TMD.

Certain statements in the PDS or this TMD constitute forward-looking statements. These forward-looking statements are based on current expectations, estimates, and projections about the Fund's business and the industry in which the Fund invests and the beliefs and assumptions of the Issuer. These forward-looking statements are not guarantees of future performance and involve known and unknown risks, uncertainties and other factors that are in some cases beyond the Issuer's control. As a result, any, or all of the forward-looking statements in the PDS or this TMD may turn out to be inaccurate.

# **Definitions**

Term	Definition		
Consumer's investment of	Consumer's investment objective		
Capital Growth	The consumer seeks to invest in a product designed to generate a capital gain. The consumer prefers exposure to growth assets (shares or property) or otherwise seeks an investment return above the current inflation rate.		
Capital Preservation	The consumer seeks to invest in a product to reduce volatility and minimise the loss in a market downturn. The consumer prefers exposure to defensive assets (such as cash or fixed-income securities) that are generally lower in risk and less volatile than growth investments.		
Capital Guaranteed	The consumer seeks a guarantee or protection against capital loss whilst still seeking the potential for capital growth (typically gained through a derivative arrangement). The consumer would likely understand the complexities, conditions and risks that are associated with such products.		
Income Distribution	The consumer seeks to invest in a product designed to distribute regular or tax-effective income. The consumer prefers exposure to income-generating assets (typically, high dividend-yielding equities, REITs, fixed income securities and money market instruments).		
Consumer's intended prod	luct use (% of investable Assets)		
Solution/Standalone (75–100%)	The consumer intends to hold the investment in part or the majority (up to 100%) of their total investable assets (see definition below). The consumer typically prefers exposure to a product with at least High portfolio diversification (see definitions below).		
Core Component (25–75%)	The consumer intends to hold the investment as a major component, up to 75%, of their total investable assets (see definition below). The consumer typically prefers exposure to a product with at least medium portfolio diversification (see definitions below).		
Satellite (<25%)	The consumer intends to hold the investment as a smaller part of their total portfolio, indicating it would be suitable for up to 25% of the total investable assets (see definition below). The consumer is likely to be comfortable with exposure to a product with Low portfolio diversification (see definitions below).		
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.		
Portfolio diversification (for completing the key product attribute section of consumer's intended product use)			
Low	Single asset class, single country, low or moderate securities holdings – e.g., high conviction Aussie equities.		

Term	Definition
Medium	1–2 asset classes, single country, broad exposure within an asset class, e.g., Aussie equities "All Ords".
High	Highly diversified across either asset classes, countries, or investment managers, e.g., Australian multi-manager balanced Fund or global multi-asset product (or global equities).
Consumer's intended inves	stment timeframe
Short (≤ 2 years)	The consumer has a short investment timeframe and may wish to redeem within two years.
Medium (2–5 years)	The consumer has a medium investment timeframe and is unlikely to redeem within two to five years.
Long (> 5 years)	The consumer has a long investment timeframe and is unlikely to redeem within five years.
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.

# Consumer's risk (ability to bear loss) and return profile

The Issuer has adopted the Standard Risk Measure (SRM) to calculate the likely number of negative annual returns over 20 years, using the guidance and methodology outlined in the Standard Risk Measure Guidance Paper for Trustees. The assessment has been undertaken assuming likely returns after fees and costs but before taxes. 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 or that a positive return could still be less than a consumer requires to meet their investment objectives/needs.

Low	The consumer is conservative or low risk, seeks to minimise potential losses (e.g., can bear up to   negative return over 20 years (SRM   to 2)) and is comfortable with a low target return profile.  The consumer typically prefers defensive assets such as cash and fixed income.
Medium	The consumer is moderate or medium risk in nature, seeking to minimise potential losses (e.g., can bear up to 4 negative returns over 20 years (SRM 3 to 5)) and comfortable with a moderate target return profile.
	The consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.
High	The consumer has a higher risk nature and can accept higher potential losses (e.g., can bear up to 6 negative returns over 20 years (SRM 6)) to target a higher target return profile.

Term	Definition
	The consumer typically prefers predominantly growth assets such as shares, property, and alternative assets with only a smaller or moderate holding in defensive assets such as cash and fixed income.
Very high	The consumer has a more aggressive or very high-risk appetite, seeks to maximise returns, and accepts higher potential losses (e.g., can bear six or more negative returns over 20 years (SRM 7).
	The consumer typically prefers growth assets such as shares, property, and alternative assets.
Consumer's need to withd	raw money
circumstances. However, t determining the ability to n	In the first instance the redemption request frequency under ordinary the redemption request frequency is not the only consideration when neet the investor's requirement to access capital. To the extent that the investments or possible liquidity constraints (e.g., ability to stagger or impact this.
Daily, weekly, monthly, quarterly, annually, or longer.	The consumer seeks to invest in a product which permits redemption requests at this frequency under ordinary circumstances and the Issuer is typically able to meet that request within a reasonable period.
Review triggers and distrib	utor 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 Fund that is not consistent with the TMD. Section 994G of the Act requires the Issuer tonotify ASIC if it becomes aware of a significant dealing in the Fund that is not consistent with the TMD. Neither the Act nor ASIC defines when dealing is 'significant', and distributors and the Issuer have the discretion to apply its ordinary meaning. Whether or not a dealing is significant is a matter to be determined in the circumstances of each case and must be determined having regard to ASIC's policy in RG 274.
	The Issuer will rely on notifications of significant dealings to monitor and review the Fund, this TMD, and its distribution strategy and meet its obligation to report significant dealings to ASIC.
	Dealings outside this TMD may be significant because:
	they constitute an individual transaction that has resulted in, or will or is likely to result in, significant detriment to the consumer (or class of consumer).
	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),

Term	Definition
	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
	<ul> <li>the nature and extent of the inconsistency of distribution with the TMD (which may be indicated by the number of red or amber ratings attributed to the consumer).</li> </ul>
	Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the reporting period.