

Target Market Determination

For max Super Fund Pension account provided by Diversa Trustees Limited (ABN 49 006 421 638) (USI 43 905 581 638 017)

1. About this document

When to use this target market determination

This target market determination (TMD) seeks to offer members, promoter and staff with an understanding of the class of members 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. Members 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 *max Super Fund Pension account* referred to in the following *Product Disclosure Statement (PDS)* and *PDS Guides*:

- [*max Super Fund Product Disclosure Statement, dated 1 October 2021*](#)
- [*max Super Fund Additional Information Guide, dated 1 October 2021*](#)

Important Dates

Date from which this target market determination is effective	5 October 2021
Date when this target market determination was last reviewed	5 October 2021
Date when this target market determination will be next reviewed	30 September 2022

2. Class of members that fall within this target market

The information below summarises the overall class of members that fall within the target market for max Super Fund Pension account, based on the product key attributes and the objectives, financial situation and needs that it has been designed to meet.

max Super Fund Pension account has been designed for members whose likely objectives, financial situation and needs (as listed below) are aligned with the product (including the key attributes). max Super Fund Pension account is for those 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,
- Want the choice of investing in a diverse range of pre-mixed pooled investment options,
- Have a minimum of \$20,000 to invest, and
- Want to invest directly in the product without a financial adviser.



Excluded class of members

max Super Fund Pension account has not been designed for individuals 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),
- Are looking for more choice of investment options such as ASX listed securities, exchange traded funds (ETFs), listed investment companies (LICs), managed funds, model portfolios and term deposits, or
- Want to invest through a financial adviser.

Product description and key attributes

The key eligibility requirements and product attributes of max Super Fund Pension account are:

Key eligibility requirements

- It is available to members 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 for members who want to invest directly without a financial adviser.

Key attributes (fees, terms and features)

- Ongoing income payments are made to the member at the frequency and amount selected by the member (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.
- It provides access to the secure online portal which enables members to track and manage their super online.
- Fees associated with max Super Fund Pension account include the following:
 - Administration fees which are charged on the member's average daily balance in their max Super Fund Pension account, deducted from the investment returns before the unit prices are determined,
 - Investment fees and buy/sell spreads associated with pooled investment options,
 - Indirect Cost Ratios (ICRs) of pooled investment options, and
 - Promoter fees which are paid to OneVue Wealth Services from the administration fees.

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

Objectives, financial situation, and needs

The table below sets out the class of members that each pooled investment option within max Super Fund 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)
Pooled investment options				
Cash	This investment option is designed for members who invest in cash deposits in a bank, short-term loan securities and other similar investments.	This investment option is designed to be suitable for members with a minimum investment timeframe of 0 to 2 years.	This investment option is designed to be suitable for members who want a low risk option. The estimated likelihood of negative annual returns is 0.5 to less than 1 year in 20 years.	<p>If a member has an investment timeframe of 0 to 2 years and has a low risk appetite, then this investment option is suitable for use as a standalone investment solution (75-100%).</p> <p>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.</p>
Income	This investment option is designed for members who prefer stable returns through exposure to a mix of income assets with little growth in their investment.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 3 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 years in 20 years.	<p>If a member has an investment timeframe of at least 3 years and is willing to accept medium, 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 3 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.</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)
Balanced	This investment option is designed for members who seek long-term growth in their investment through exposure to a variety of asset classes with an emphasis on growth assets.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 5 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 5 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 5 years and has either a low or a 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.</p>
Conservative	This investment option is designed for members who prefer stable returns through exposure to a variety of asset classes with an emphasis on income assets, with some growth in their investment.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 3 years.	This investment option is designed to be suitable for members willing to accept medium to high 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 3 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 3 years and has either a low or a very 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.</p>
Moderate	This investment option is designed for members who prefer modest medium-term growth in their investments through exposure to a variety of growth and income assets classes.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 5 years.	This investment option is designed to be suitable for members willing to accept medium to high 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 5 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 5 years and has either a low or a</p>

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				very 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 higher growth in their investment over the long term with a high level of volatility from year to year.	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 (<25%) of their broader portfolio of investments.</p>
Passive Growth MySuper	This investment option is designed for members who seek exposure to mainly growth assets and can tolerate a high level of risk over the investment timeframe.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 5 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 5 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 5 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.</p>
Ethical Shares	This investment option is designed for members seeking to invest in a broad ethical growth	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	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

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)
	investment portfolio through Australian and international equities.		less than 6 years in 20 years.	<p>standalone investment solution (75-100%).</p> <p>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.</p>
Australian Shares	This investment option is designed for members who prefer to invest in Australian companies listed on the Australian Stock Exchange.	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.	<p>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%).</p> <p>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.</p>
International Shares	This investment option is designed for members who prefer to invest in international companies that are listed on exchanges around the world.	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.	<p>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%).</p> <p>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.</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)
Listed Property Securities	This investment option is designed for members who invest in property or buildings via property trusts listed on the Australian Stock Exchange.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 5 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 5 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 5 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.</p>
Australian Fixed Interest	This investment option is designed for members who prefer to invest in loans to Australian governments or businesses where a fixed interest rate and loan length are agreed in advance.	This investment option is designed to be suitable for members with a minimum investment timeframe of at least 5 years.	This investment option is designed to be suitable for members willing to accept low to medium risk. The estimated likelihood of negative annual returns is 1 to less than 2 years in 20 years.	<p>If a member has an investment timeframe of at least 5 years and is willing to accept low to medium 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 5 years and 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.</p>

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

Consistency between target market and the product

max Super Fund 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 or working reduced hours, therefore requiring an income stream for living expenses,
- The member is investing directly in the product, and
- The member can only invest in pre-mixed pooled investment options.

3. How this product is to be distributed

Distribution channels

max Super Fund Pension account is available for investment directly online by members through <https://onesuper.com/funds/max-super/>.

Distribution conditions

max Super Fund Pension account should only be distributed under the following circumstances:

- If the member is investing directly without a financial adviser,
- If the minimum investment by pension members is at least \$20,000,
- If the member does not require insurance cover through their pension account,
- The member will draw an income stream of at least the minimum amount required, at least annually, and
- The member 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

- Members investing in the product will be asked a number of questions in the application form to sign up to the product. These questions seek to ensure that the distribution conditions are met, therefore making it likely that members who invest in the product are in the class of members for which it has been designed for.
- For members 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 members for an income stream because of reduced or no other forms of personal income.
- The requirements for insurance are reduced or nil based on members' 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:

Initial review	30 September 2022
Periodic review	On an annual basis starting 30 September 2022
Review triggers or events	Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited):

- a material change to the design or distribution of the product, including related documentation;
- occurrence of a significant dealing;
- significant increase in investment option switching,
- significant increase in members exiting the product,
- fails to achieve member outcomes,
- distribution conditions found to be inadequate,
- external events such as adverse media coverage or regulatory attention, and
- significant changes in metrics, including, but not limited to, complaints and investment performance of pooled investment options.

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.

Complaints	<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>
Significant dealings	<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"> ○ 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, ○ Potential/actual harm to members if members outside the target market invest in the product, ○ Inconsistency of distribution conditions with the TMD, and ○ Time period when members outside the target market invested in the product. <p>Distributors will report transaction data and outcomes from sale practices monitoring within quarterly reporting period.</p>