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# Target Market Determination

**Product / Fund:** Perpetual Pure Equity Alpha Fund

**Effective Date:** 23 December 2022

**TMD Version:** 3

**Issuer name:** Perpetual Investment Management Limited

**Issuer ABN:** 18 000 866 535

**Issuer AFSL:** 234426

**ARSN:** 155 515 138

**APIR code:** PER0668AU

**ISIN code:** AU60PER06685

## About this document

This Target Market Determination is required under section 994B of the *Corporations Act 2001 (Cth)*. It outlines the class of consumers for which this product has been designed and is intended to assist distributors in understanding who the product is intended to be distributed to. The document forms part of the design and distribution arrangements for the product and outlines distribution conditions and restrictions as well as reporting requirements for distributors.

This document is not a Product Disclosure Statement (PDS) and does not provide a full 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. People interested in acquiring this product should carefully read the PDS before making a decision whether to buy this product. The PDS is available at [www.perpetual.com.au](http://www.perpetual.com.au).

## Target market statement

The Perpetual Pure Equity Alpha Fund (Fund) is designed for consumers who:

- are seeking capital growth
- are intending to use the Fund as a minor or satellite allocation within a portfolio
- have a medium to long-term investment timeframe
- have a high or very high risk and return profile
- are seeking withdrawal proceeds to be typically paid within a week in normal operating conditions, and
- are seeking the ability to make daily withdrawal requests and to have such requests accepted daily under normal operating conditions

## Description of target market

Consumer attributes		Key product attributes
<b>Investment goals</b>	<b>TMD indicator</b>	<b>Investment objective and key attributes</b>
Capital Growth	In target market	<p><b>Investment Objective</b></p> <p>The Fund aims to generate positive returns over a market cycle irrespective of market conditions by investing in both long and short positions of predominantly Australian shares.</p> <p><b>Key Attributes</b></p> <p>The Fund has the following key attributes:</p> <ul style="list-style-type: none"> <li>A fund that will predominantly invest in Australian Shares (both long and short), cash may be used defensively to preserve capital and it can invest opportunistically (both long and short) in global shares.</li> </ul>
Capital Preservation	Not considered in target market	
Income Distribution	Not considered in target market	
<b>Intended product use (% of investable assets)</b>	<b>TMD Indicator</b>	<b>Portfolio diversification</b>
Whole Portfolio (up to 100%)	Not considered in target market	<p>The Fund provides gross share exposure of 0-220%, net share exposure -20% - 100%, net global share exposure -10-20% and cash 0-120%.</p> <p>As the Fund provides exposure across Australian Shares and international shares opportunistically its portfolio diversification has been assessed as “Low”. Given the higher risk associated with the shorting and portfolio concentration it is recommended that the strategy only be used for a minor or satellite allocation within a portfolio. The Fund has no benchmark and aims to generate positive returns.</p>
Major allocation (up to 75%)	Not considered in target market	
Core Component (up to 50%)	Not considered in target market	
Minor allocation (up to 25%)	In target market	
Satellite allocation (up to 10%)	In target market	
<b>Intended investment timeframe</b>	<b>TMD Indicator</b>	<b>Suggested length of investment</b>
Short ( $\leq 2$ years)	Not considered in target market	<p>This product is designed for consumers who seek to invest their capital for a minimum period of five years.</p>
Medium ( $>2$ years $< 5$ years)	Not considered in target market	
Medium to Long ( $\geq 5$ years $< 7$ years)	In target market	
Long ( $\geq 7$ years)	In target market	

Consumer attributes		Key product attributes
Risk (ability to bear loss) and Return profile	TMD Indicator	Risk level
Low	Not considered in target market	<p>The Fund's standard risk measure (SRM) is high, which is reflected in the PDS. The SRM is based on industry guidance and is not a complete assessment of all forms of investment risk.</p> <p>Specific risks associated with this fund include:</p> <p><b>Asset class concentration risk:</b> Investing in a Fund with exposure to solely one asset class such as Australian shares may lead to more volatile returns than investing in a Fund with a more diversified portfolio with exposure to multiple asset classes.</p> <p><b>Portfolio concentration risk</b> – Investing in a Fund with smaller number of investments may lead to more volatile returns than investing in a Fund with a more diversified portfolio.</p> <p><b>Prime Broker risk</b> – When the Fund borrows securities or cash, we engage a prime broker (refer to 'Key service providers' for details) to provide stock for the borrowing and lending of securities. Any assets taken by the prime broker as collateral from the Fund may potentially be used by the prime broker for its own purposes (including lending those assets to third parties) for the period that the Fund retains the relevant liability. Therefore, there is a risk that if the prime broker becomes insolvent whilst the Fund remains indebted to the prime broker, the investment assets of the Fund may not be returned in full.</p> <p><b>Short-position risk</b> – establishing a short position in a security involves a higher level of risk than investing in a security. This is because when you invest in a security, the maximum loss is generally limited to the amount invested. With short positions there is no limit on the maximum loss because there is no upper limit on the security's price. A further risk is that the securities lender may recall a borrowed security, so the Fund will have to find another securities lender willing to lend the security or may have to buy the security quickly at an unfavourable price.</p> <p>For more information on risks and other features of the Fund please refer to the PDS.</p> <p>The Fund is most suitable for consumers who have a high or very high-risk return profile and:</p> <ul style="list-style-type: none"> <li>• are seeking a fund that has medium diversification across asset classes</li> <li>• are seeking to maximise returns</li> <li>• can accept potential losses to their capital, especially in the short-term and,</li> <li>• are comfortable with the specific risks associated with the Fund as disclosed in the PDS.</li> </ul>
Medium	Not considered in target market	
High	In target market	
Very high	In target market	

Withdrawal request and acceptance frequency	TMD Indicator	Withdrawal request frequency
Daily	In target market	<p>Withdrawal requests can be made <b>daily</b>, and must be received, verified, and accepted by the Fund's unit registry prior to 3pm (Sydney time) on a Business Day to be processed using that day's exit price. If received after 3pm, it will be processed using the next available price.</p> <p>We can delay processing withdrawal requests as described under "Withdrawal payment timing" below.</p>
Weekly	In target market	
Monthly	In target market	
Quarterly	In target market	
Annually or longer	In target market	
Payment timing for withdrawal proceeds	TMD Indicator	Withdrawal payment timing
Daily	Not considered in target market	<p>Proceeds from your withdrawal will typically be available within 3-5 business days but can be up to 14 business days (i.e. during distribution periods) from when we have accepted the request, given normal operating conditions.</p> <p>We can also delay processing withdrawal requests (including switches from a fund) or stagger the payment of large amounts from the Fund according to the Fund's constitution if we believe that's in the best interests of consumers (see 'Suspension of applications, switches and withdrawals' in the 'Additional information' section in the PDS for more information).</p>
Weekly	In target market	
Monthly	In target market	
Quarterly	In target market	
Annually or longer	In target market	

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## Distribution information

### Distribution conditions / restrictions

This product can be distributed:

1. Through the Perpetual Pure Series Funds PDS, either:

- Directly (and non-advised) – via the issuer’s website [perpetual.com.au](http://perpetual.com.au), including online and physical application forms. Consumers applying via the online application form will be asked a series of questions to assist the Issuer in understanding whether the consumer is likely to be within the target market.
- Via financial advisers where consumers have received personal advice

For a consumer to access the product directly, they must read and accept the PDS.

2. Through specified distributors or distribution channels such as an investment or superannuation platform or wrap product. The issuer of each platform product has its own obligations as a distributor to take reasonable steps that will or are reasonably likely to result in retail product distribution conduct being consistent with this TMD.

It has been determined that the distribution conditions and restrictions will make it likely that customers who purchase the product are in the class of customers for which it has been designed. We consider that the distribution conditions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

### Distributor reporting requirements

Distributors required to report	Reporting requirement	Reporting period	Method of reporting (using FSC data standards where practicable)
All distributors	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 10 business days following the end of a calendar quarter.	Information to be sent to <a href="mailto:DDOmail@perpetual.com.au">DDOmail@perpetual.com.au</a>
All distributors	Significant dealings outside the target market determination.	As soon as practicable but no later than 10 business days after becoming aware of a significant dealing.	Information to be sent to <a href="mailto:DDOmail@perpetual.com.au">DDOmail@perpetual.com.au</a>
All distributors	To the extent a distributor is aware of dealings outside the target market, these should be reported to the issuer, including the reason the acquisition is outside the target market, and whether the acquisition occurred under personal advice.	Within 10 business days following the end of a calendar quarter.	Information to be sent to <a href="mailto:DDOmail@perpetual.com.au">DDOmail@perpetual.com.au</a>

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## Review periods and triggers

We will review this target market determination as outlined below.

Mandatory review periods	
Review period	Maximum period for review
Initial review	1 year and 3 months (Complete)
Subsequent / periodic reviews	2 years and 3 months (March 2025)

Review triggers
The issuer has determined that a significant dealing outside the target market determination has occurred.
Material deviation in actual performance of the product (compared to investment objective / benchmark) over a sustained period.
Material change to fund liquidity which may cause consumer harm.
Material change to investment objective, key product features or fees.
Material or unexpectedly high number of complaints about the product (or distribution of the product) which indicate a systemic issue has occurred.
Significant regulatory action which indicates that the target market determination is no longer appropriate.

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

## Instructions

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

**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.

## Definitions

Term	Definition
<b>Consumer's investment objective</b>	
Capital Growth	The consumer seeks to invest in a product designed to generate capital return. The consumer prefers exposure to growth assets (such as 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 loss in a market down-turn. 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.
Income Distribution	The consumer seeks to invest in a product designed to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (typically, dividend-yielding equities, fixed income securities and money market instruments).
<b>Consumer's intended product use (% of Investable Assets)</b>	
Whole Portfolio (up to 100%)	The consumer intends to hold the investment as either a 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).
Major allocation (up to 75%)	The consumer intends to hold the investment as either a part or the majority (up to 75%) 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 (up to 50%)	The consumer intends to hold the investment as a major core component, up to 50%, 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).

Term	Definition
Minor (up to 25%)	The consumer intends to hold the investment as a minor part of their total portfolio, as an indication 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).
Satellite (up to 10%)	The consumer intends to hold the investment as a satellite part of their total portfolio, as an indication it would be suitable for up to 10% of the total investable assets (see definition below). The consumer is likely to be comfortable with exposure to a product with Very Low portfolio diversification and very high risk (see definitions below).
Investable Assets	Those assets that the consumer has available for investment, excluding the residential home.
<b>Portfolio diversification (for completing the key product attribute section of consumer's intended product use)</b>	
Low	Single asset class, single country, low or moderate holdings of securities - e.g. high conviction Australian shares.
Medium	1-2 asset classes, single country, broad exposure within asset class, e.g. Australian shares "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 shares).
<b>Consumer's intended investment timeframe</b>	
Short (≤ 2 years)	The consumer has a short investment timeframe and may wish to redeem within two years.
Short to Medium (>2 years < 5 years)	The consumer has a short investment timeframe and is unlikely to redeem within two years.
Medium to Long (≥5 year <7 years)	The consumer has a medium investment timeframe and is unlikely to redeem within five years.
Long (≥7 years)	The consumer has a long investment timeframe and is unlikely to redeem within seven years.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>	
<p>This TMD assesses risk using the Standard Risk Measure (SRM) and, if applicable, other risk factors that are specific to a product.</p> <p>The SRM estimates the likely number of negative annual returns over a 20-year period (note the bands in the SRM guidance differ from the bands used in this TMD). However, the 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.</p>	



Term	Definition
	<p>Some products may have other risk factors which result from, for example, the use of leverage, derivatives or short selling, liquidity or withdrawal limitations, or a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating.</p> <p>The Key Product Attributes section supplements the SRM methodology by also considering other risk factors.</p>
Low	<p>The consumer is conservative or low risk in nature, seeks to minimise 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> <p>Consumer typically prefers defensive assets such as cash and fixed income.</p>
Medium	<p>The consumer is moderate or medium risk in nature, seeking to minimise potential losses (e.g. has the ability to bear up to 4 negative returns over a 20-year period (SRM 3 to 5)) and comfortable with a moderate target return profile.</p> <p>Consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.</p>
High	<p>The consumer is higher risk in nature and can accept higher potential losses (e.g. has the ability to bear up to 6 negative returns over a 20-year period (SRM 6)) in order to target a higher target return profile.</p> <p>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.</p>
Very high	<p>The consumer has a more aggressive or very high-risk appetite, seeks to maximise returns and can accept higher potential losses (e.g. has the ability to bear 6 or more negative returns over a 20-year period (SRM 7) and possibly other risk factors, such as leverage).</p> <p>Consumer typically prefers growth assets such as shares, property and alternative assets and comfortable with the specific risks associated with the product such as investment strategy risk and liquidity risk.</p>
<b>Consumer's withdrawal request and acceptance frequency</b>	
Daily / Weekly / Monthly / Quarterly / Annually or longer	<p>The consumer seeks to invest in a product which permits withdrawal requests and the acceptance of such requests at this frequency under ordinary circumstances.</p>
<b>Consumer's timing for withdrawal proceeds</b>	
Daily / Weekly / Monthly / Quarterly / Annually or longer	<p>The consumer seeks to invest in a product which facilitates the payment of withdrawal proceeds following a withdrawal request under ordinary circumstances.</p> <p>The issuer is typically able to meet that request within a reasonable period having regard to the following factors:</p> <ul style="list-style-type: none"> <li>• time taken to realise the underlying assets of the product in normal market conditions;</li> <li>• the issuer's typical withdrawal process for the product in normal operating conditions, and</li> <li>• the nature of the product as a managed investment scheme</li> </ul>

Term	Definition
<b>Distributor Reporting</b>	
Significant dealings	<p>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.</p> <p>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.</p> <p>Dealings outside this TMD may be significant because:</p> <ul style="list-style-type: none"> <li>• they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or</li> <li>• 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 consumer).</li> </ul> <p>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> <li>• the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes),</li> <li>• 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</li> <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>

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The PDS for the relevant fund, issued by Perpetual Investment Management Limited, should be considered before deciding whether to acquire or hold units in that fund. The PDS can be obtained by calling 1800 022 033 or visiting our website [www.perpetual.com.au](http://www.perpetual.com.au).

### More information

Contact your financial adviser or call:

Adviser Service: Australia 1800 062 725 or New Zealand 0800 441 656

Consumer Service: Australia 1800 022 033 or New Zealand 0800 442 261

Email: [investments@perpetual.com.au](mailto:investments@perpetual.com.au)

[www.perpetual.com.au](http://www.perpetual.com.au)

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