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# Target Market Determination

**Product / Fund:** Perpetual WealthFocus Investment Advantage

**Effective Date:** 15 December 2022

**TMD Version:** 3

**Issuer name:** Perpetual Investment Management Limited  
**Issuer ABN:** 18 000 866 535  
**Issuer AFSL:** 234426  
**ARSN:** 091 142 460  
**APIR code:** PER0245AU  
**ISIN code:** AU60PER02452

## 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 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 Product Disclosure Statement before making a decision whether to buy this product. The Product Disclosure Statement is available at [www.perpetual.com.au](http://www.perpetual.com.au).

**PLEASE NOTE:** Effective on and from 13 September 2023, the offer for the Perpetual Global Innovation Share Option is withdrawn. Accordingly, all reference to this option should be disregarded.

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## Target market statement

Perpetual WealthFocus Investment Advantage (the Product) is a simple to use investment product, designed for investors who want a broad investment choice and flexibility to manage their investment portfolio.

The Product offers a range of investment options (which have different levels of risk and generate investment returns in different ways, over different time frames and from different asset classes) enabling investors to select the investment option(s) that most closely meet their own particular needs and circumstances. Investors also have the flexibility to change their investment selection as their needs and circumstances change over time.

The Product is suitable for investors seeking the ability to make daily withdrawal requests and to have such requests accepted daily under normal operating conditions, and are seeking withdrawal proceeds to be typically paid within a week under normal operating conditions.

The Product is not suitable for investors seeking a guaranteed return of capital.

## Description of target market

Consumer attributes		Key product attributes
<b>Size of client investment</b>	<b>TMD indicator</b>	<b>Investment minimums</b>
\$0 ≤ \$999	Not considered in target market	The minimum initial investment is \$2,000 (\$1,000 with a savings plan).
≥ \$1,000	In target market	
<b>Desired asset classes</b>	<b>TMD indicator</b>	<b>Investment options</b>
Cash	In target market	More than 40 investment options available across a variety of asset classes and asset managers. The investment options and the specific details of the risk, suggested length of investment and objective of each investment option are described under "Investment Options" below.
Fixed income and credit	In target market	
Property and infrastructure	In target market	
Australian shares	In target market	
International shares	In target market	
Diversified – conservative	In target market	
Diversified - balanced	In target market	
Diversified - growth	In target market	

Consumer attributes		Key product attributes
<b>Investment goals</b>	<b>TMD indicator</b>	<b>Investment objective</b>
Capital growth	In target market	The Product offers a diversified range of investment options investing in different asset classes with varying capital growth and income generation objectives. Some investment options may offer some degree of capital preservation, but the Product does not provide options which are capital guaranteed.
Capital preservation	Potentially in target market	
Income distribution	In target market	The investment options have the potential to pay income at the distribution frequency shown in the Investment Option Profile table. However, there is no guarantee that the investment options will be able to pay income in the future in any particular distribution period and the level of any income may vary materially from one distribution period to the next.
<b>Investment horizon</b>	<b>TMD indicator</b>	<b>Suggested length of investment</b>
Short ( $\leq 2$ years)	Not considered in target market	The Product offers a range of investment options with most investment options designed for investors with a longer investment horizon. However, there are some options which may suit investors whose time horizon is shorter.
Medium ( $> 2$ years $\leq 8$ years)	In target market	
Long ( $> 8$ years)	In target market	
<b>Risk (ability to bear loss) and Return profile</b>	<b>TMD Indicator</b>	<b>Risk level</b>
Low	In target market	The Product provides a large number of investment options which range from low to very high risk of investment losses over different time horizons.
Medium	In target market	
High	In target market	
Very high	In target market	

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## Investment options

The Plan offers members flexibility to choose between more than 40 different investment options across a variety of asset classes and asset managers.

The risk levels in the Investment Options Profile table (pages 9 to 13) are the investment options' standard risk measures which are reflected in the Product Disclosure Statement. The SRM is based on industry guidance and is not a complete assessment of all forms of investment risk. Due to substantial volatility and high risk of losses, these two options have been classified as Very High Risk – Speculative and have the following specific risks:

- Perpetual Geared Australian – asset class concentration risk, drawdown risk, gearing risk, investment volatility risk and portfolio concentration risk
- Perpetual Global Innovation Share (**effective on and from 13 September 2023, this option is withdrawn**) - asset class concentration risk, drawdown risk, industry sector risk, investment volatility risk and portfolio concentration risk

**Asset Class Concentration Risk** – Investing in an investment option with or exposure to solely one asset class such as Australian shares may lead to more volatile returns than investing in an investment option with a more diversified portfolio with a larger number of positions or exposure to multiple asset classes.

**Drawdown Risk** – The risk of a steep decline in value of a single investment or an investment portfolio from a relative peak. Any time taken to recover a drawdown can vary considerably due to the nature of the underlying assets, the investment strategy, and the size of the drawdown.

**Gearing Risk:** With gearing, the investment manager borrows money from a lender to increase the amount the investment option can invest. While this can result in larger investment gains in a rising market, it is also likely to magnify losses in a falling market. Gearing increases the volatility of an investment option's investment returns. Consequently, a geared investment option is considered to have a higher investment risk than a comparable investment option that is ungeared.

**Industry Sector Risk** - Investing in an investment option primarily with exposure to a single industry sector (eg technology) exposes members to additional risk since the price of many stocks within an industry sector may fall at the same time due to economic or other factors affecting that particular industry.

**Investment Volatility Risk** – The risk there is a high level of volatility in the value of your investment because of a particular asset class or investment strategy. The value of your investment may vary significantly from day to day.

**Portfolio Concentration Risk** - Investing in an investment option with a smaller number of investments may lead to more volatile returns than investing in an investment option with a more diversified portfolio.

For more information on risks of the investment options please refer to the Product Disclosure Statement.

The Very High Risk – Speculative investment options are designed for members who

- are seeking capital growth
- are intending to use the investment option as a satellite allocation within a portfolio
- have a long-term investment timeframe
- have a very high risk/return profile

## Investment Options by Asset Class

The TMD indicator provide an assessment of the key attributes of the investment options available by asset class to assist distributors in understanding the options available and how they may suit investors needs and objectives. Further information on each investment option is provided in the Investment Option Profiles table.

**Key:** In target market: ■ Potentially in target market: ■ Not considered in target market: ■

Investment option attributes	Very High Risk - Speculative	Asset class groupings							
		Cash	Fixed income and credit	Property & Infrastructure	Australian shares	International shares	Diversified conservative	Diversified balanced	Diversified growth
<b>Investment objective</b>									
Capital Growth									
Capital Preservation									
<b>Intended product use (% of investable assets)</b>									
Solution / Standalone (75-100%)									
Core Component (25-75%)									
Minor Allocation (10-25%)									
Satellite Allocation (<10%)									
<b>Intended investment timeframe</b>									
Short (≤ 2 years)									
Medium (> 2 years < 7 years)									
Long (≥ 7 years)									
<b>Risk (ability to bear loss) and Return profile</b>									
Low									
Medium									
High									
Very high									

## Investment Option Profiles

Specific details of the risk, suggested length of investment and objective of the investment options:

Investment option	Asset class	Risk level	Suggested length of investment	Distribution frequency	Objective
Perpetual Cash	Cash	2 - Low	Any period	Quarterly	Aims to: <ul style="list-style-type: none"> <li>provide investors with capital stability, regular income and easy access to funds by investing in deposits, money-market and fixed income securities</li> <li>outperform the Bloomberg AusBond Bank Bill Index (before fees and taxes) on an ongoing basis.</li> </ul>
Bentham Global Income	Fixed income and credit	6 - High	Three years	Monthly	Aims to: <ul style="list-style-type: none"> <li>provide exposure to global credit markets and to generate income with some potential for capital growth over the medium-to-long term</li> <li>outperform its composite benchmark (50% Bloomberg AusBond Composite 0+ Yr Index and 50% Bloomberg AusBond Bank Bill Index) over the suggested investment time frame.</li> </ul>
Macquarie Income Opportunities	Fixed income and credit	5 – Medium to high	Three years	Monthly	Aims to: <ul style="list-style-type: none"> <li>outperform the Bloomberg AusBond Bank Bill Index over the medium term (before fees)</li> <li>provide higher income returns than traditional cash investments at all stages of interest rate and economic cycles.</li> </ul>
Perpetual Diversified Income	Fixed income and credit	4 - Medium	Three years or longer	Quarterly	Aims to provide regular income and consistent returns above the Bloomberg AusBond Bank Bill Index (before fees and taxes) over rolling three-year periods by investing in a diverse range of income generating assets.
Perpetual Dynamic Fixed Income	Fixed income and credit	4 - Medium	Three years or longer	Quarterly	Aims to provide: <ul style="list-style-type: none"> <li>regular income by investing in a diverse range of income generating assets</li> <li>a positive return (before fees and taxes) over rolling three-year periods.</li> </ul>
Schroder Fixed Income	Fixed income and credit	5 – Medium to high	Three years or longer	Quarterly	Aims to outperform the Bloomberg AusBond Composite 0+ Yr Index after fees over the medium term.
Vanguard Australian Fixed Interest Index	Fixed income and credit	4 - Medium	Three years or longer	Quarterly	Seeks to track the return of the Bloomberg AusBond Composite 0+ Yr Index before taking into account fees, expenses and tax.
Lazard Global Listed Infrastructure	Property and infrastructure	7 – Very high	Five years or longer	Quarterly	Aims to achieve total returns (comprising income and capital appreciation and before the deductions of fees and taxes) that outperform inflation, as measured by the Australian Consumer Price Index, by 5%pa over rolling five-year period.

Investment option	Asset class	Risk level	Suggested length of investment	Distribution frequency	Objective
Pendal Property Securities	Property and infrastructure	7 – Very high	Five years or longer	Quarterly	Aims to provide a return (before fees, costs and taxes) that exceeds the S&P/ASX 300 A-REIT (Sector) (TR) Index over the medium-to-long term. There is a high risk of losing money in any year. The fund is likely to produce higher returns over the long term.
Vanguard Australian Property Securities Index	Property and infrastructure	6 - High	Seven years	Quarterly	Seeks to track the return of the S&P/ASX 300 A-REIT Index before taking into account fees, expenses and tax.
Ausbil Australian Active Equity	Australian Shares	6 - High	Five years or longer	Half-yearly	Aims to outperform the S&P/ASX300 Accumulation Index per annum over rolling three-year periods with moderate tax-effective income by investing in a portfolio of listed Australian equities that are generally chosen from the S&P/ASX 300 Index.
Ausbil Australian Emerging Leaders	Australian Shares	6 - High	Five years or longer	Half-yearly	Aims to outperform per annum over rolling three-year periods a composite benchmark comprising the S&P/ASX Midcap 50 Accumulation Index (70%) and S&P/ASX Small Ordinaries Australian equities that are primarily chosen from the S&P/ASX 300 Index, but generally exclude securities from the S&P/ASX 50 Leaders Index. The fund invests in small to medium cap stocks which possess potential for superior growth.
Fidelity Australian Equities	Australian shares	6 - High	Five years or longer	Quarterly	Aims to achieve returns in excess of the S&P/ASX 200 Accumulation Index over the medium to long term.
Investors Mutual Australian Share	Australian shares	6 - High	Four to five years	Half-yearly	Aims to provide a rate of return (after fees and expenses and before taxes) which exceeds the return of the benchmark S&P/ASX300 Accumulation Index on a rolling four-year basis.
Pendal Australian Equity	Australian shares	6 - High	Five years or longer	Quarterly	Aims to provide a return (before fees, costs and taxes) that exceeds the S&P/ASX 300 (TR) Index over the medium-to-long term. There is a high risk of losing money in any year. The fund is likely to produce higher returns over the long term.
Perpetual Australian Share	Australian shares	6 - High	Five years or longer	Half-yearly	Aims to: <ul style="list-style-type: none"> <li>provide long-term capital growth and regular income through investment predominantly in quality Australian industrial and resource shares</li> <li>outperform the S&amp;P/ASX 300 Accumulation Index (before fees and taxes) over rolling three-year periods.</li> </ul>
Perpetual Concentrated Equity	Australian shares	6 - High	Five years or longer	Half-yearly	Aims to: <ul style="list-style-type: none"> <li>provide long-term capital growth and income through investment predominantly in quality Australian industrial and resource shares</li> <li>outperform the S&amp;P/ASX 300 Accumulation Index (before fees and taxes) over rolling three-year periods.</li> </ul>



Investment option	Asset class	Risk level	Suggested length of investment	Distribution frequency	Objective
Perpetual ESG Australian Share	Australian shares	6 - High	Five years or longer	Half-yearly	Aims to: <ul style="list-style-type: none"> <li>provide long-term capital growth and regular income through investment predominantly in quality Australian shares that meet PIML's ESG and values-based criteria</li> <li>outperform the S&amp;P/ASX 300 Accumulation Index (before fees and taxes) over rolling three-year periods.</li> </ul>
Perpetual Geared Australian	Australian shares	7 – Very high - Speculative	Seven years or longer	Half-yearly	Aims to: <ul style="list-style-type: none"> <li>enhance long-term capital growth through borrowing (gearing) to invest predominantly in quality Australian industrial and resource shares</li> <li>outperform the S&amp;P/ASX 300 Accumulation Index (before fees and taxes) over rolling three-year periods.</li> </ul>
Perpetual Industrial Share	Australian shares	6 - High	Five years or longer	Quarterly	Aims to: <ul style="list-style-type: none"> <li>provide long-term capital growth and regular income through investment predominantly in quality Australian industrial shares</li> <li>outperform the S&amp;P/ASX 300 Industrials Accumulation Index (before fees and taxes) over rolling three-year periods.</li> </ul>
Perpetual SHARE-PLUS Long-Short	Australian shares	6 - High	Five years or longer	Half-yearly	Aims to: <ul style="list-style-type: none"> <li>provide long-term capital growth and income through investment in quality shares and taking short positions predominantly in selected Australian shares</li> <li>outperform the S&amp;P/ASX 300 Accumulation Index (before fees and taxes) over rolling three-year periods.</li> </ul>
Perpetual Smaller Companies	Australian shares	6 - High	Five years or longer	Half-yearly	Aims to: <ul style="list-style-type: none"> <li>provide long-term capital growth and income through investment in quality Australian industrial and resource shares which, when first acquired, do not rank in the S&amp;P/ASX 50 Index</li> <li>outperform the S&amp;P/ASX Small Ordinaries Accumulation Index (before fees and taxes) over rolling three-year periods.</li> </ul>
Schroder Australian Equity	Australian shares	6 - High	Three years or longer	Half-yearly	Aims to outperform the S&P/ASX 200 Accumulation Index over rolling three-to-five-year periods by investing in a broad range of companies from Australia and New Zealand.
Vanguard Australian Shares Index	Australian shares	6 - High	Seven years	Quarterly	Seeks to track the return of the S&P/ASX 300 Index before taking into account fees, expenses and tax.

Investment option	Asset class	Risk level	Suggested length of investment	Distribution frequency	Objective
Barrow Hanley Global Share	International shares	7 – Very high	Seven years or longer	Half-yearly	Aims to: <ul style="list-style-type: none"> <li>provide long-term capital growth through investment in quality global shares</li> <li>outperform the MSCI World Net Total Return Index (AUD) (before fees and taxes) over rolling three-year periods.</li> </ul>
Magellan Global	International shares	7 – Very high	Seven to ten years	Half-yearly	Aims to achieve attractive risk-adjusted returns over the medium to long-term, while reducing the risk of permanent capital loss.  A further aim is to deliver 9% p.a. net of fees over the economic cycle.
MFS Global Equity	International shares	7 – Very high	Five years or longer	Yearly	Aims to: <ul style="list-style-type: none"> <li>seek capital appreciation over the longer term by investing in a diversified portfolio of global shares</li> <li>outperform its benchmark (MSCI World Index (with net dividends reinvested before fees) over a full market cycle, before taking into account fees, taxes and expenses.</li> </ul>
Perpetual Global Allocation Alpha	International shares	6 - High	Five years or longer	Yearly	Aims to achieve long-term capital growth and outperform the MSCI World ex Australia Net Total Return Index (AUD) with lower risk (before fees and taxes) over rolling three-year periods.
Perpetual Global Innovation Share <i>(effective on and from 13 September 2023, this option is withdrawn)</i>	International shares	7 – Very high – Speculative	Seven years or longer	Half-yearly	Aims to: <ul style="list-style-type: none"> <li>provide long-term capital growth through investment in global shares that are benefiting from changes in technology and innovation</li> <li>outperform the MSCI All Countries World Net Total Return Index (AUD) (before fees and taxes) over rolling three-year periods.</li> </ul>
Platinum Asia	International shares	7 – Very high	Five years or longer	Yearly	Aims to provide capital growth, where measured over at least five years, by investing in undervalued companies in the Asia region excluding Japan.
Platinum International	International shares	7 – Very high	Five years or longer	Yearly	Aims to provide capital growth, where measured over at least five years, by investing in undervalued companies from around the world.
T. Rowe Price Global Equity	International shares	7 – Very high	Five to seven years or longer	Yearly	Aims to provide long-term capital appreciation by investing primarily in a portfolio of securities of companies which are traded, listed or due to be listed on recognised exchanges and/or markets throughout the world. The portfolio may include investments in the securities of companies traded, listed or due to be listed on recognised exchanges and/or markets of developing countries. The fund's benchmark is the MSCI All Country World Index ex-Australia (unhedged).
Vanguard International Shares Index	International shares	6 - High	Seven years or longer	Quarterly	Seeks to track the return of the MSCI World ex-Australia Index (with net dividends reinvested) in Australian dollars before taking into account fees, expenses and tax.

Investment option	Asset class	Risk level	Suggested length of investment	Distribution frequency	Objective
Vanguard International Shares Index (Hedged)	International shares	6 - High	Seven years or longer	Quarterly	Seeks to track the return of the MSCI World ex-Australia (with net dividends reinvested) hedged into Australian dollars Index before taking into account fees, expenses and tax.
BlackRock Diversified ESG Stable	Diversified - conservative	5 – Medium to high	Five years or longer	Quarterly	Aims to achieve superior investment performance through providing returns that exceed those of the neutral portfolio benchmark, comprising a portfolio of published indices approximately 70% of which represent interest bearing assets and 30% of which represent growth assets, before fees over rolling three-year periods.
Perpetual Conservative Growth	Diversified - conservative	4 - Medium	Three years or longer	Quarterly	Aims to: <ul style="list-style-type: none"> <li>• provide moderate growth over the medium term and income through investment in a diversified portfolio with an emphasis on cash and fixed income securities</li> <li>• outperform the All Groups CPI + 3.5% pa (before fees and taxes) over at least two-year periods</li> <li>• outperform a composite benchmark (before fees and taxes) reflecting its allocation to the various asset types over rolling three-year periods.</li> </ul>
Perpetual Diversified Growth	Diversified - balanced	6 - High	Three years or longer	Quarterly	Aims to: <ul style="list-style-type: none"> <li>• provide long-term capital growth and income through investment in a diversified portfolio of growth and income assets</li> <li>• outperform the All Groups CPI + 4.5% pa (before fees and taxes) over at least three-year periods</li> <li>• outperform a composite benchmark (before fees and taxes) reflecting its allocation to the various asset types over rolling three-year periods.</li> </ul>
Perpetual Diversified Real Return	Diversified - balanced	5 – Medium to high	Five years or longer	Quarterly	Aims to target a pre-tax return of 5% per annum above inflation (before fees and taxes) over rolling five-year periods, while minimising downside risk.
BlackRock Diversified ESG Growth	Diversified - growth	6 - High	Five years or longer	Quarterly	Aims to achieve superior investment performance through providing returns that exceed those of the neutral portfolio benchmark, comprising a portfolio of published indices approximately 30% of which represent interest bearing assets and 70% of which represent growth assets, before fees over rolling three-year periods.

Investment option	Asset class	Risk level	Suggested length of investment	Distribution frequency	Objective
BlackRock Tactical Growth	Diversified - growth	6 - High	Five years or longer	Half-yearly	<p>Aims to outperform peer performance consistent with a growth-orientated investment strategy encompassing:</p> <ul style="list-style-type: none"> <li>• a broadly diversified exposure to Australian and international assets</li> <li>• active asset allocation, security selection and risk management</li> <li>• flexibility to deviate meaningfully from the strategic asset allocation to help manage total portfolio risk</li> </ul> <p>The fund aims to outperform a composite benchmark (before fees) reflecting its allocation to the various asset types over a five-year rolling period.</p>
Morningstar Growth Real Return	Diversified - growth	6 - High	Seven years or longer	Quarterly	Aims to earn a rate of return that exceeds CPI increases by at least 3.5%pa over rolling seven-year periods.
Perpetual Balance Growth	Diversified - growth	6 - High	Five years or longer	Quarterly	<p>Aims to:</p> <ul style="list-style-type: none"> <li>• provide long-term capital growth and income through investment in a diversified portfolio with an emphasis on Australian and international share investments</li> <li>• outperform the All Groups CPI + 5.0% pa (before fees and taxes) over at least five-year periods</li> <li>• outperform a composite benchmark (before fees and taxes) reflecting its allocation to the various asset types over rolling three-year periods.</li> </ul>
Schroder Sustainable Growth	Diversified - growth	6 - High	Three years or longer	Half-yearly	Aims to deliver an investment return of 5% pa above Australian inflation over rolling three-year periods. Inflation is defined as the Reserve Bank of Australia's Trimmed Mean, as published by the Australian Bureau of Statistics.

Consumer attributes		Key product attributes
<b>Withdrawal request and acceptance frequency</b>	<b>TMD Indicator</b>	<b>Withdrawal request and acceptance frequency</b>
Daily	In target market	<p>Withdrawal requests can be made daily, 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	
<b>Payment timing for withdrawal proceeds</b>	<b>TMD indicator</b>	<b>Withdrawal payment timing</b>
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 half-yearly 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 Product Disclosure Statement for more information).</p>
Weekly	In target market	
Monthly	In target market	
Quarterly	In target market	
Annually or longer	In target market	

## Distribution information

### Very High Risk - Speculative investment options - distribution conditions / restrictions

The Very High Risk - Speculative investment options can be distributed either:

Directly (and non-advised) – via the Product Disclosure Statement on the issuer's website perpetual.com.au, including online and physical application forms. For these consumers applying directly (online or via a physical application form) for Very High Risk - Speculative investment options and without an adviser, an experienced issuer representative will contact potential consumers and ask a series of questions in order for the issuer to understand whether the consumer is within the target market for these investment options, these questions will align to the attributes in this TMD for the Very high – Speculative investment options as described under the "Investment Options by Asset Class" section above.

Following this, if the consumer has been assessed as being unlikely to be in the target market, the issuer representative will inform the consumer. Based on responses to certain knock-out questions the consumer's application solely in relation to the Very High Risk – Speculative investment options will be rejected.

The issuer will monitor such situations to determine if there are significant dealings outside of the target market for the Very High Risk – Speculative investment options.

Only representatives of the issuer that have undergone internal training in respect of the Very High Risk – Speculative investment options and their target markets and who have demonstrated knowledge, competence and experience in respect of the Very High Risk – Speculative investment options and their target market are able to promote and distribute this product.

- Via financial advisers where consumers have received personal advice

### Other investment options - Distribution conditions / restrictions

Distribution Condition	Distribution Condition Rationale	Applicable
There are no distribution conditions	The investment options available and the ability to construct an individualised investment strategy means that the Plan may be suitable for investors with a range of risk profiles and may suit both direct investors and investors who have received personal advice. 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.	Yes
Only suitable for distribution to consumers who have received personal advice	N/A	No
Only suitable for distribution through specified distributor/s / distribution channel	N/A	No
Other	N/A	No

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

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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>

## 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
Subsequent / periodic reviews	2 years and 3 months



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## Review triggers

The issuer has determined that a significant dealing outside the target market determination has occurred.

Significant liquidity issues across a range of options which may cause consumer harm.

Material change 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.

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## 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, high dividend-yielding equities, fixed income securities and money market instruments).

Term	Definition
<b>Consumer's intended product use (% of Investable Assets)</b>	
Solution / Standalone (75-100%)	The consumer intends to hold the investment as either a part or the majority (up to 100%) of their total <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least High <i>portfolio diversification</i> (see definitions below).
Core Component (25-75%)	The consumer intends to hold the investment as a major component, up to 75%, of their total <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least Medium <i>portfolio diversification</i> (see definitions below).
Minor (10 - 25%)	The consumer intends to hold the investment as a smaller 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 <i>portfolio diversification</i> (see definitions below).
Satellite (<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 Low <i>portfolio diversification</i> and very high risk (see definitions below).
Investable Assets	Those assets that the investor 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 ( $\leq$ 2 years)	The consumer has a short investment timeframe and may wish to redeem within two years.
Medium (> 2 years <7 years)	The consumer has a medium investment timeframe and is unlikely to redeem within two years.
Long ( $\geq$ 7 years)	The consumer has a long investment timeframe and is unlikely to redeem within seven years.

Term	Definition
<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 an investment option.</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> <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>

Term	Definition
<b>Consumers' withdrawal request and acceptance frequency</b>	
Daily / Weekly / Monthly / Quarterly / Annually or longer	The consumer seeks to invest in a product which permits withdrawal requests and acceptance of such requests at this frequency under ordinary circumstances.
<b>Consumers' payment timing for withdrawal proceeds</b>	
Daily / Weekly / Monthly / Quarterly / Annually or longer	<p>The consumer seeks to invest in a product which facilitates 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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