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# Target Market Determination

**Product / Fund:** Perpetual Pure Microcap Fund – Class A

**Effective Date:** 13 January 2023

**TMD Version:** 4

**Issuer name:** Perpetual Investment Management Limited  
**Issuer ABN:** 18 000 866 535  
**Issuer AFSL:** 234426  
**ARSN:** 164 986 047  
**APIR code:** PER0704AU  
**ISIN code:** AU60PER07048

## 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).

## Target market statement

The Perpetual Pure Microcap Fund is designed for consumers who:

- are seeking capital growth
- are intending to use the Fund as a satellite allocation within a portfolio
- have a long-term investment timeframe
- have a very high risk/return profile,
- are 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 in normal operating conditions

## Description of target market

Consumer attributes		Key product attributes	
Investment goals	TMD indicator	Investment objective	
Capital Growth	In target market	<p>The Fund aims to provide consumers with long term capital growth via an investment in a portfolio of quality Australian microcap companies. Microcap companies are defined as companies with a market capitalisation or free float of less than \$300 million on acquisition.</p> <p>The Fund has the following key attributes:</p> <ul style="list-style-type: none"> <li>Potential for capital growth through the investment in under-researched microcap stocks, which are typically mispriced and undervalued.</li> <li>Potential to pay income on a half-yearly basis given the Fund's investment universe. However, there is no guarantee that the Fund 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 next.</li> </ul>	
Capital Preservation	Not considered in target market		
Income Distribution	Potentially in target market		
Intended product use (% of investable assets)	TMD Indicator	Portfolio diversification	Asset class
Solution / standalone (75-100%)	Not considered in target market	<p>The Fund is comprised of 70-100% Australian shares and 0-30% cash.</p> <p>As the Fund provides exposure to Microcap Australian shares only, its portfolio diversification has been assessed as 'Low' and most appropriate as a satellite allocation as a % of investable assets.</p>	Australian Shares
Core Component (25-75%)	Not considered in target market		
Minor allocation (10 - 25%)	Not considered in target market		
Satellite allocation (<10%)	In target market		
Intended investment timeframe	TMD Indicator	Suggested length of investment	
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 seven years and most suitable for those consumers with a long-intended investment timeframe of 7 years or more.</p>	
Medium (>2 years < 7 years)	Not considered 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 6 (high), which is 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.</p> <p>Specific risks associated with this fund include:</p> <p><b>Smaller Company Risk:</b> When investing in a company generally considered small by market capitalisation, consumer is exposed to many risks to which the company is exposed, and this may impact the value of the security.</p> <p><b>Investment Volatility risk:</b> The risk there is a high level of volatility in the value of your investment, so the value of your investment may vary significantly from day to day.</p> <p><b>Drawdown risk:</b> The steep decline in value of a single investment or an investment portfolio from a relative peak</p> <p><b>Liquidity Risk:</b> Shares in smaller and microcap companies may trade less frequently and in smaller volumes and therefore may be affected by liquidity risk to a greater degree than shares in larger companies.</p> <p><b>Concentration Risk:</b> Investing in a fund with a smaller number of investments or 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 a larger number of positions or exposure to multiple asset classes.</p> <p>For more information on risks of the Fund please refer to the Product Disclosure Statement.</p> <p>The Fund is most suitable for consumers who have a more aggressive or very high-risk return profile and:</p> <ul style="list-style-type: none"> <li>• are seeking a fund that has low diversification</li> <li>• are seeking to maximise returns and</li> <li>• can accept higher potential losses, especially in the short-term and,</li> <li>• are comfortable with the aforementioned specific risks associated with the Fund</li> </ul>
Medium	Not considered in target market	
High	Not considered in target market	
Very high	In target market	
Withdrawal request and acceptance frequency	TMD Indicator	Withdrawal request and acceptance frequency
Daily	In target market	<p>Withdrawal requests can be made <u>daily</u>, 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>
Weekly	In target market	
Monthly	In target market	

Quarterly	In target market	We can delay processing withdrawal requests as described under “Withdrawal payment timing” below.	
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		
<b>Preferred level of environmental, social and governance integration</b>	<b>TMD Indicator</b>		<b>ESG approach</b>
ESG integration: Explicitly considers ESG-related factors that are material to the risk and return of the investment, alongside traditional financial factors, when making investment decisions.	In target market		ESG integration: The Fund explicitly considers ESG-related factors that are material to the risk and return of the investment, alongside traditional financial factors, when making investment decisions.
Positive or negative ESG screening: Investments are selected based on specific ESG themes or rules that go beyond investment risk and return, for example, promoting positive environmental or social outcomes, or avoiding unethical activities.	Not in target market		

## Distribution information

### Distribution conditions / restrictions

This product can be distributed:

1. Through Perpetual Pure Series Funds, either:

- Directly (and non-advised) – via the issuer’s website [perpetual.com.au](http://perpetual.com.au), including online and physical application forms. For these consumers applying directly (online or via a physical application form) 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. These questions will align to the attributes in this TMD.

Following this, if the consumer has been assessed as being unlikely to be in the target market, the issuer representative will inform the investor. Based on responses to certain knock-out questions this application will be rejected.

The issuer will monitor such situations to determine if there are significant dealings outside of the target market. Only representatives of the issuer that have undergone internal training in respect of the Fund and the Fund’s target market and who have demonstrated knowledge, competence and experience in respect of the Fund and the Fund’s target market are able to promote and distribute this product.

- Via financial advisers where consumers have received personal advice

For a consumer to access the product, 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	Within 10 business days following the	Information to be sent to <a href="mailto:DDOmail@perpetual.com.au">DDOmail@perpetual.com.au</a>

	the reason the acquisition is outside the target market, and whether the acquisition occurred under personal advice.	end of a calendar quarter.	
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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
Subsequent / periodic reviews	2 years and 3 months

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, which may cause consumer harm.
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>	
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 minor part of their total portfolio, as an indication it would be suitable for up to 25% of the total <i>investable assets</i> (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

Term	Definition
	below). The consumer is likely to be comfortable with exposure to a product with 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 ( $\leq 2$ 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.
<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> <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>



Term	Definition
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>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 the acceptance of such requests at this frequency under ordinary circumstances
<b>Consumers' 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 the nature of the product as a managed investment scheme</li> </ul>
<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> </ul>

Term	Definition
	<ul style="list-style-type: none"> <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 Product Disclosure Statement (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)

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