

Target Market Determination

Australian Unity Select Income Fund

Introduction

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). This TMD describes the class of consumers that comprises the target market for the financial product and matters relevant to the product's distribution and review (specifically, distribution conditions, review triggers and periods, and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the product being consistent with the most recent TMD (unless the distribution is excluded conduct).

This document is **not** a product disclosure statement (**PDS**) and is **not** a complete 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. Persons interested in acquiring this product should carefully read the PDS for the product before making a decision whether to buy this product.

Important terms used in this TMD are defined in the TMD Definitions which supplement this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained by contacting our Investor Services team on 13 29 39 (within Australia) or on our website at www.australianunity.com.au/wealth.

Target Market Summary

This product is intended for use as a **satellite allocation** for a consumer who is seeking **income distribution** and has a **high** or **very high** risk and return profile for that portion of their investment portfolio. It is likely to be consistent with the financial situation and needs of a consumer with a **1 year minimum** investment timeframe and who is unlikely to need to access their capital **prior to the maturity of the Syndicate-Fund(s) in which they are invested**.

Fund and Issuer identifiers

Issuer	Australian Unity Funds Management Limited
Issuer ABN	60 071 497 115
Issuer AFSL	234454
TMD contact details	13 29 39
Fund name	Australian Unity Select Income Fund

ARSN	091 886 789
APIR Code	AUS0083AU
ISIN Code	AU60AUS00833
TMD issue date	14 December 2023
TMD Version	5
Distribution status of fund	Available

Description of Target Market

TMD indicator key

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



Instructions

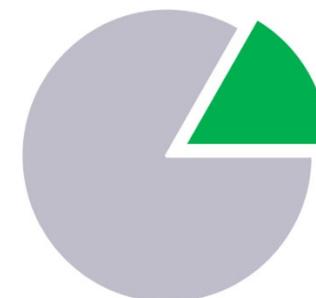
In the tables below, Column 1, Consumer Attributes, indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering this product. Column 2, TMD indicator, indicates whether a consumer meeting the attribute in column 1 is likely to be in the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

Appropriateness

The Issuer has assessed the product and formed the view that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market, as the features of this product in Column 3 of the table below are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (for example, with an intended product use of *minor allocation*). In such circumstances, the product should be assessed against the consumer's attributes for the relevant portion of the portfolio, rather than the consumer's portfolio as a whole. For example, a consumer may seek to construct a balanced or moderate diversified portfolio with a minor allocation to growth assets. In this case, a product with a *High* risk/return profile may be consistent with the consumer's objectives for that *minor allocation*



notwithstanding that the risk/return profile of the consumer as a whole is *Medium*. In making this assessment, distributors should consider all features of a product (including its key attributes).

The FSC has provided more detailed guidance on how to take this *portfolio view* for diversification, available on the [FSC website](#).

Consumer Attributes	TMD indicator	Product description including key attributes
Consumer's investment objective		
Capital Growth	Not in target market	<p>Fund overview</p> <p>The Fund aims to provide regular income distributions and capital stability, through a selection of investments into registered first mortgage loans (Syndicate-Funds) with a short duration, and interest paid from the Fund's Cash Account.</p> <p>The Fund is structured as a 'contributory mortgage scheme', comprising a Cash Account and a selection of Syndicate-Funds. Once invested in the Cash Account, investors may 'select' a Syndicate-Fund(s) to invest in.</p> <p>Capital Growth</p> <p>The Fund is "Not in target market" for Capital Growth. Syndicate-Funds and the Cash Account do not appreciate in value, and therefore, the Fund is not suitable for investors seeking capital growth. However, the risk profile of Syndicate-Funds is High and there is a risk an investor may lose some or all of the money invested in a Syndicate-Fund. An investor's exposure to the risk of capital loss is limited to the specific Syndicate-Fund(s) they are invested in.</p>
Capital Preservation	See issuer instructions	<p>Income Distribution</p> <p>The Fund is "In target market" for Income Distribution. Generally, all Syndicate-Fund distributions are sourced from income received, or capitalised, in the relevant distribution period, interest paid from the Fund's Cash Account and are payable monthly. As the Fund aims to distribute on a monthly basis, the Fund is appropriate for consumers who are seeking Income Distribution.</p> <p>Issuer instructions – Capital Preservation</p>

Consumer Attributes	TMD indicator	Product description including key attributes
Income Distribution	In target market	<p>Syndicate-Funds are generally capital stable investments. An investor who has a Capital Preservation investment objective may be more likely to achieve this outcome by diversifying an investment in the Fund across a number of Syndicate-Funds which have a low correlation to each other. Consumers should be aware that Syndicate-Fund's have a High risk profile and the potential for capital loss; there is a risk that you may lose some or all of the money you have invested. An investor's exposure to the risk of capital loss is limited to the specific Syndicate-Fund(s) they are invested in. Investors should seek professional financial advice if their investment objective for investing in the Fund is Capital Preservation.</p>
Consumer's intended product use (% of Investable Assets)		
Solution/Standalone (up to 100%)	Not in target market	<p>The Fund comprises a Cash Account and a selection of Syndicate- Funds. Each Syndicate-Fund provides an opportunity to invest in a registered first mortgage.</p>
Major allocation (up to 75%)	Not in target market	<p>An investment in a Syndicate-Fund, or several Syndicate-Funds, provides very low diversification by asset class and have a High risk profile.</p>
Core component (up to 50%)	Not in target market	<p>Consumers should consider an investment in a Syndicate-Fund or selection of Syndicate-Funds in the context of diversification across an overall investment portfolio.</p> <p>An investment in the Fund diversified across multiple Syndicate-Funds is appropriate for consumers using the Fund as a Satellite allocation of up to 10% of an investment portfolio.</p>
Minor allocation (up to 25%)	See issuer instructions	<p>Issuer instructions</p> <p>The Fund may be suitable as a Minor allocation for consumers in a pension phase and looking for regular income without capital growth and who intend to diversify investment across a number of the Fund's Syndicate-Funds. Consumers should be aware of the Fund's High risk profile and potential for loss; there is a risk that you may lose some or all of the</p>

Consumer Attributes	TMD indicator	Product description including key attributes
Satellite allocation (up to 10%)	In target market	money you have invested. Consumers should seek professional financial advice if an investment in the Fund is intended to form more than 10% of their investment portfolio.
Consumer's investment timeframe		
Minimum investment timeframe	1 year	<p>The typical duration of a Syndicate-Fund is 12 to 24 months, however the investment term may be shorter or longer in some instances.</p> <p>Withdrawals are generally not offered during the term of a Syndicate-Fund.</p> <p>At the end of the term of a Syndicate-Fund, a consumer's funds are returned to the Fund's Cash Account. Withdrawals from the Fund's Cash Account are then generally available for withdrawal by providing two business days' notice.</p> <p>Consumers should be aware that an investment in a Syndicate-Fund is subject to the risks set out in the Fund's PDS and the relevant Syndicate-Fund's Supplementary Product Disclosure Statement (SPDS), and that there is a risk of extended delays for the return of funds and/or a consumer may risk losing some or all of their money.</p> <p>The Fund is appropriate for consumers who have a minimum 1 year investment timeframe. However consumers should refer to the expected maturity date advised in the SPDS for each specific Syndicate-Fund and consider whether the Syndicate-Fund's timeframe aligns with their investment timeframe.</p> <p>As consumers may elect to reinvest in subsequent Syndicate-Funds, the Fund may also be appropriate for consumers who have longer investment timeframe.</p>
Consumer's Risk (ability to bear loss) and Return profile		
Low	Not in target market	<p>Consumers should be aware that:</p> <ul style="list-style-type: none"> • an investment in a Syndicate-Fund is subject to the risks set out in the Fund's PDS and the relevant SPDS; • there is a risk of extended delays for the return of funds and/or a consumer may risk losing some or all of their money; • an investment in a single Syndicate-Fund provides very low diversification; and • the Fund targets a high return profile and has a high potential for losses.
Medium	Not in target market	

Consumer Attributes	TMD indicator	Product description including key attributes
High	In target market	<p>The Fund is therefore likely to be appropriate for consumers who have a High or Very High risk and return profile.</p> <p>This assessment of risk and return is specific to an investment in the Fund only. It is important that investors consider the above risk assessment specific to the Fund, their acceptable risk and return profile in the context of their entire portfolio, as well as how the risk profile of the Fund would interact with that broader assessment of acceptable risk and return.</p>
Very high	In target market	
Extremely high	Not in target market	
Consumer's need to access capital		
Within one week of request	Not in target market	<p>The Fund comprises a Cash Account and a selection of Syndicate-Funds. A consumer's ability to access capital varies depending on whether the consumer is invested in the Cash Account, a Syndicate-Fund(s), or both at any given time.</p>
Within one month of request	Not in target market	<p>Consumers who require the ability to request access to capital invested in a Syndicate-Fund are considered to be 'Not in target market'.</p> <p>Access to capital invested in Syndicate-Fund(s)</p>
Within three months of request	Not in target market	<p>Withdrawal requests are generally not available during the term of a Syndicate-Fund. At the end of the term of the Syndicate-Fund, a consumer's funds are returned to the Fund's Cash Account.</p>
Within one year of request	Not in target market	<p>The Fund is therefore likely to be appropriate for a consumer who does not need to access the monies within the stated term of the relevant Syndicate-Fund, that is, typically 12 to 24 months.</p>
Within 5 years of request	Not in target market	<p>Consumers should be aware that an investment in a Syndicate-Fund is subject to the risks set out in the Fund's Product Disclosure Statement and the relevant Supplementary Product Disclosure Statement, and that there is a risk of extended delays for the return of funds and/or a consumer may risk losing some or all of their capital.</p>

Consumer Attributes	TMD indicator	Product description including key attributes
Within 10 years of request	Not in target market	Access to capital invested in the Cash Account Under normal circumstances, where a consumer's funds are invested in the Cash Account, a consumer can withdraw from the Cash Account with two business days' notice by providing a withdrawal request. Withdrawals are generally paid within two business days although under the constitution for the Fund, the Responsible Entity has 90 days from the date of the request to satisfy withdrawal requests from the Fund's Cash Account.
10 years or more	Not in target market	
Upon repayment of loan	In target market	

Distribution conditions/restrictions

Distribution conditions	Distribution condition rationale	Distributors this condition applies to
<p>Investors seeking to invest directly in the Fund are required to adhere to the following steps:</p> <ol style="list-style-type: none"> 1. Complete the Application Form, explicitly confirming their thorough review of the PDS. 2. Respond to a set of inquiries integrated into the Application Form, which pertain to their individual needs, objectives, and financial circumstances insofar as their contemplated investment in the Fund is concerned. <p>For those direct investors who do not seek personalized advice prior to applying, the completed Application Form and their responses to the questions therein will be assessed by an AUFM representative. Based on this assessment, the AUFM representative will offer feedback to the investor if it is determined that they may fall outside the intended target market.</p>	<p>The distribution conditions designed for direct investors are structured to enhance the likelihood of their being aligned with the target market for the following reasons:</p> <ol style="list-style-type: none"> 1. Prior Information: Investors are required to read the Product Disclosure Statement (PDS) and relevant Syndicate-Fund Supplementary Product Disclosure Statement (SPDS) which provide information regarding the characteristics and associated risks of the Fund and relevant Syndicate-Fund before they commit to an investment. 2. Tailored Feedback: AUFM will evaluate the responses provided in the Application Form's questionnaire and offer personalized feedback, 	<p>This Distribution Condition applies to all distributors who intend to engage in retail distribution of the Fund.</p>

Distribution conditions	Distribution condition rationale	Distributors this condition applies to
<p>It is important to note that AUFM reserves the right to decline an application based on an investor's responses to the questions contained within the Application Form. In such instances, the investors will be promptly notified of the decision.</p>	<p>typically communicated via email or by phone, in cases where it appears an investor's profile deviates from the intended target market.</p> <p>3. Application Assessment: AUFM retains the discretion to decline an application if an investor's responses to the questions within the Application Form suggest a mismatch with the Fund's target market. Investors will receive prompt notification of this decision.</p> <p>Additionally, AUFM will monitor any complaints and significant transactions to gauge the effectiveness of the product distribution arrangements for direct retail investors. Necessary adjustments will be made as required to ensure the ongoing suitability of these arrangements</p>	

Review triggers

Material change to key attributes, fund investment objective and/or fees.
Material deviation from benchmark / objective over sustained period.
Key attributes have not performed as disclosed by a material degree and for a material period.
Determination by the issuer of an ASIC reportable Significant Dealing.
Material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the product or distribution of the product.
The use of Product Intervention Powers, regulator orders or directions that affects the product.

Mandatory TMD review periods

Review period	Maximum period for review
Initial review	Not Applicable – initial review has already occurred
Subsequent review	1 years and 3 months

Distributor reporting requirements

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Act) relating to the product. The distributor should provide all the content of the complaint, having regard to privacy.	As soon as practicable but no later than 10 business days following end of calendar quarter.	All distributors
Significant dealing outside of target market, under section 994F(6) of the Act. See Definitions for further detail.	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	All distributors

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to Australian Unity Funds Management using the method specified on this website: www.australianunity.com.au/wealth/distributor-complaints. This link also provides contact details relating to this TMD for Australian Unity Funds Management.

Disclaimer

This target market determination (**TMD**) is made by Australian Unity Funds Management Limited ABN 60 071 497 115, AFS Licence No 234454 (**Issuer**) pursuant to section 994B of the Corporations Act 2001 (Cth). The Issuer is the responsible entity of the Fund and the issuer of interests in the Fund (**Product**).

This document is not a summary of the Fund or the Product, or the Product Disclosure Statement for the Product (PDS). It does not (and is not intended to) set out a summary of the terms or features of the Product.

This document is intended to provide a record of the Issuer's assessment of the Product, which forms the basis of this TMD. It also details the Product's distribution channel(s) and distribution strategy which must align to this TMD. This document is also used as a basis for the periodic review of the TMD and the Product's suitability for distribution to the identified target market.

This document does not (and is not intended to) provide or constitute financial product advice. The target market described in this TMD is general in nature only and does not make any statement or representation that a particular person is or is not in the target market described in this TMD. This TMD does not take into account the objectives, financial situation and needs of any particular person and the Issuer makes no representation as to whether or not the Fund or the Product is suitable for any particular person.

Prior to making any decision in relation to the Fund or the Product, investors should obtain and consider the PDS, and obtain financial product advice if necessary.

This TMD should not be taken by a person to be a substitute for obtaining and considering the PDS or obtaining financial product advice that takes into account the person's objectives, financial situation and needs.

An investment in the Product is subject to investment risk, including delays on the payment of withdrawal proceeds and the loss of income or the principal invested. While any forecasts, estimates and opinions in this material are made on a reasonable basis, actual future results and performance of the Product may differ materially from the forecasts, estimates and opinions set out in this TMD. No guarantee as to the repayment of capital, the performance of the Product or any rate of return described in this TMD is made by the Issuer or any other person.

This material is not intended for distribution to, or use by, any person in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

The Issuer, and its officers, employees, agents and advisers, believe that the information in this TMD and the sources on which the information is based (which may be sourced from third parties) are correct as at the date of this TMD. While every care has been taken in the preparation of this TMD, no warranty of accuracy or reliability is given and no responsibility for the information is accepted by the Issuer, or its officers, employees, agents or advisers. To the fullest extent permitted under law, the Issuer excludes all liability for information provided in this TMD.

No part of this TMD may be reproduced or distributed in any manner without the prior written permission of the Issuer.

Definitions

In some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Term	Definition
Consumer's investment objective	
Capital Growth	The consumer seeks to invest in a product designed or expected to generate capital return over the investment timeframe. 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 designed or expected to have low volatility and minimise capital loss. The consumer prefers exposure to defensive assets that are generally lower in risk and less volatile than growth investments (this may include cash or fixed income securities).
Income Distribution	The consumer seeks to invest in a product designed or expected to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (this may include high dividend-yielding equities, fixed income securities and money market instruments).
Consumer's intended product use (% of Investable Assets)	
Solution/Standalone (up to 100%)	The consumer may hold the investment as up to 100% of their total <i>investable assets</i> . The consumer is likely to seek a product with <i>very high</i> portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>high</i> portfolio diversification.
Core Component (up to 50%)	The consumer may hold the investment as up to 50% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>medium</i> portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>low</i> portfolio diversification.
Satellite allocation (up to 10%)	The consumer may hold the investment as up to 10% of the total <i>investable assets</i> . The consumer may seek a product with <i>very low</i> portfolio diversification. Products classified as <i>extremely high</i> risk are likely to meet this category only.
<i>Investable Assets</i>	Those assets that the investor has available for investment, excluding the residential home.

Term	Definition
Portfolio diversification (for completing the key product attribute section of consumer's intended product use)	
Note: exposures to cash and cash-like instruments may sit outside the diversification framework below.	
Very low	The product provides exposure to a single asset (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).
Low	The product provides exposure to a small number of holdings (for example, fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, a single major commodity (e.g. gold) or equities from a single emerging market economy).
Medium	The product provides exposure to a moderate number of holdings (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).
High	The product provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asset classes, sectors or geographic markets (for example, global equities).
Very high	The product provides exposure to a large number of holdings across a broad range of asset classes, sectors <u>and</u> geographic markets with limited correlation to each other.
Consumer's intended investment timeframe	
Minimum	The minimum suggested timeframe for holding the product. Typically, this is the rolling period over which the investment objective of the product is likely to be achieved.
Consumer's Risk (ability to bear loss) and Return profile	
<p>This TMD uses the Standard Risk Measure (<i>SRM</i>) to estimate the likely number of negative annual returns for this product over a 20 year period, using the guidance and methodology outlined in the <i>Standard Risk Measure Guidance Paper For Trustees</i> (note the bands in the SRM guidance differ from the bands used in this TMD). However, 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 (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some products may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating.</p> <p>A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>	

Term	Definition
Low	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a conservative or low risk appetite, • seeks to minimise volatility and 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>The consumer typically prefers stable, defensive assets (such as cash).</p>
Medium	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a moderate or medium risk appetite, • seeks low volatility and potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)), and • is comfortable with a moderate target return profile. <p>The consumer typically prefers defensive assets (for example, fixed income).</p>
High	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a high risk appetite, • can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)), and • seeks high returns (typically over a medium or long timeframe). <p>The consumer typically prefers growth assets (for example, shares and property).</p>
Very high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a very high risk appetite, • can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)), and • seeks to maximise returns (typically over a medium or long timeframe). <p>The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).</p>
Extremely high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has an extremely high risk appetite, • can accept significant volatility and losses, and • seeks to obtain accelerated returns (potentially in a short timeframe). <p>The consumer seeks extremely high risk, speculative or complex products which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes (for example, crypto-assets or collectibles).</p>

Term	Definition
Consumer's need to access capital	
<p>This consumer attribute addresses the likely period of time between the making of a request for redemption/withdrawal (or access to investment proceeds more generally) and the receipt of proceeds from this request under ordinary circumstances. Issuers should consider both the frequency for accepting the request and the length of time to accept, process and distribute the proceeds of such a request. To the extent that the liquidity of the underlying investments or possible liquidity constraints (e.g. ability to stagger or delay redemptions) could impact this, this is to be taken into consideration in aligning the product to the consumer's need to access capital. Where a product is held on investment platforms, distributors also need to factor in the length of time platforms take to process requests for redemption for underlying investments. Where access to investment proceeds from the product is likely to occur through a secondary market, the liquidity of the market for the product should be considered.</p>	

Term	Definition
Distributor Reporting	
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"> • they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or • 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). <p>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> • the nature and risk profile of the product (which may be indicated by the product’s risk rating or access to capital timeframes), • 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 • the nature and extent of the inconsistency of distribution with the TMD (which may be indicated by the number of red and/or amber ratings attributed to the consumer). <p>Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if:</p> <ul style="list-style-type: none"> • it constitutes more than half of the distributor’s total retail product distribution conduct in relation to the product over the quarter, • the consumer’s intended product use is <i>solution/ standalone</i>, • the consumer’s intended product use is <i>core component</i> or higher and the consumer’s risk/return profile is <i>low</i>, or • the relevant product has a green rating for consumers seeking <i>extremely high</i> risk/return.