

Seniors Investment Bond

28 September 2026

Products covered by this Target Market Determination (TMD)

This TMD applies to Seniors Investment Bond¹ (**Product**) which is an investment life insurance product issued by Lifeplan Australia Friendly Society Limited (Lifeplan).

Legal disclaimer

A TMD is required under section 994B of the Corporations Act 2001 (Cth) (the Act). It sets out the target market for the Product, triggers to review the target market and certain other information. It forms part of Lifeplan Australia Friendly Society Limited's (Issuer) design and distribution framework for the Product.

This document is not a Product Disclosure Statement (PDS) and is not a summary of the Product features or terms of the Product. This document does not consider any person's individual objectives, financial situation or needs. Persons interested in acquiring this Product should carefully read the relevant PDS for the Product before deciding whether to buy this 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 Product's suitability for distribution to the identified target market.

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 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.

Capitalised terms have the meaning given to them in the Product's PDS, unless otherwise defined. The PDS for Seniors Investment Bond can be obtained by contacting Australian Seniors on **1300 694 918** (within Australia) or on their website at seniors.com.au.

¹ Seniors Investment Bond is a white-labelled version of the 10Invest product bearing Australian Seniors branding. Seniors Investment Bond is promoted and distributed by Australian Seniors Insurance Agency, a trading name of Greenstone Financial Services Pty Ltd ABN 53 128 692 884, AFSL 343079 (GFS). GFS is an authorised representative of Lifeplan (ARN 324391).

Name of product	Seniors Investment Bond
APIR	LIF7213AU
TMD date	28 September 2026
TMD Version	1
Issuer name	Lifeplan Australia Friendly Society Limited
Issuer AFSL	237989
Issuer ABN	78 087 649 492

Product description

The Product is an investment bond that is an investment-linked life policy for individuals, companies and trusts seeking a tax-effective long-term investment to accumulate savings for a savings goal or a key life event, with the ability to nominate a beneficiary other than the consumer and invest on behalf of a child.

Target Market

The Target Market is the class of persons who are the type of consumer set out below, who have one or more of the needs and objectives set out below and are in the financial situation set out below.

Note: this section relates to the requirements of s994B(5)(b) of the Act.

Type of Consumer

The consumer can be:

- individuals or joint consumers aged 16 or over;
- a child between the age of 10 and 16 with parental or guardian consent; or
- companies and trusts (including deceased estates) (in which case the directors or trustees would be considered the 'consumers').

The Product can also be invested on behalf of a child up to 16 years old and then transferred to the child at a selected vesting age between 10 and 25 years old. The original policy owner, who must be above the age of 16, will hold the policy in their name until it vests to the child.

The Product is **not suitable** for investment by superannuation funds, as both superannuation funds and investment bonds are tax paid investments, with superannuation funds being taxed at a rate of 15% which is lower than the 30% tax rate for investment bonds.

Life stage of consumer

The Product is suitable for consumers looking to establish a long-term savings plan, to fund future expenses for children or grandchildren and consumers in or approaching retirement, looking for a tool to help manage the transfer of intergenerational wealth.

For some consumers in their late retirement phase, the Product can also be used to improve some Social Security entitlements and allow for a regular withdrawal facility as a supplementary income stream.

Needs and objectives of consumer

The Product is likely suitable for consumers that have one or more of the needs and objectives set out below:

Consumer needs and objectives	Key Product attributes relevant to needs and/or objectives
Establish a long-term savings plan	Underlying investment options are designed to complement a long-term savings goal (subject to the following 125% contribution rule). No contribution caps apply in the initial year of investment. After the initial year of investment, this Product allows a consumer to make additional annual contributions subject to the 125% rule (i.e. that contributions in each subsequent year do not exceed 125% of the contributions in the previous year). Additional contributions in excess of 125% of the previous year's contributions can be made, however, the 10-year period after which the tax benefit is reached will re-set.
Tax effectiveness	The product is a 'tax paid' investment meaning that tax on a consumer's investment in the Product is paid by the Issuer at a tax rate of 30% (being the capped life insurance tax rate), rather than at the consumer's personal marginal tax rate. After 10 years, and subject to the 125% rule, a consumer may make withdrawals from their investment in the Product without paying any additional personal tax (the tax benefit). If a consumer makes a withdrawal during the first 10 years, their investment earnings will be assessable income for tax purposes. Although, the consumer will benefit from a 30% tax offset against their assessable earnings.
Flexibility in accessing funds	Consumers can make one off withdrawals at any time (subject to a minimum balance of \$1,000). In addition, the consumer can establish regular withdrawals to provide an ongoing income stream. There may be tax implications if withdrawing within the 10-year period.
Estate planning outside of a will	Can create certainty in estate planning outcomes and pass on wealth to an intended recipient or beneficiaries outside of an estate.
Achieve a desired level of investment growth from a range of investment options	A range of diverse investment options are available for a consumer to choose from. The investment options allow the consumer to choose their risk appetite, desired investment timeframe and return expectations.
Qualify for, manage or improve entitlements to certain Australian Government social security benefits	Enables consumers to achieve investment returns without increasing their assessable income or impacting their entitlement to some social security benefits (subject to applicable thresholds).

Financial Situation

The Product is likely to be suitable for consumers with one or more of the needs and objectives set out below:

Level of decision making

The Product offers consumers a range of investment options to choose from. These options provide a range of risk levels from medium to high/very high risk which enables consumers to choose an investment option to match their risk tolerance, time horizon and return objectives.

Intended size of investment

The minimum investment balance for the Product is \$1,000.

There are no caps to an initial contribution and any additional annual contributions are designed to be limited to the 125% rule to maximise the taxation benefits.

Therefore, the Product is likely to be appropriate for consumers who are intending to invest \$1,000 or more.

Investment Timeframe

The Product allows a consumer to invest in a tax paid investment under which the Issuer pays the tax on a consumer's investment at a rate of 30% (being the capped life insurance tax rate). After 10 years, a consumer may make withdrawals from their investment in the Product without paying any additional personal tax subject to the 125% rule.

If a consumer makes a withdrawal during the first 10 years, the investment earnings will be assessable for income tax purposes. Although, the consumer will benefit from a 30% tax offset against their assessable earnings.

Therefore, whilst the taxation benefits may be maximised if the investment in the Product is held for 10 years (subject to the 125% rule), the investment can be accessed at any time and a taxation offset may be available. As a result, the Product is generally more suitable for consumers with a medium to long-term investment horizon (for example, 3 years or more), noting this is a guide rather than a minimum investment term and suitability will depend on the consumer's circumstances and the underlying investment option(s) selected.

Where the consumer is investing on behalf of a child or nominating a beneficiary, a defined investment timeframe may be less relevant, as these features relate primarily to nominating the future transfer of ownership rather than a specific investment horizon.

Refer to the Product's PDS and application form for the minimum recommended investment period of the underlying investment options which a consumer can select.

Access to Capital

Consumers may redeem their investment at any time (subject to a minimum withdrawal threshold detailed in the PDS).

Under normal market conditions withdrawals are processed within 7 business days. There are tax implications for withdrawals made within the first 10 years. Therefore, the Product is suitable for consumers seeking flexible access to capital.

The Product is **not** suitable for:

- superannuation contributions; or
- consumers seeking regular income distributions that are calculated and paid by the product issuer.²

² It is possible for consumers to set up their own periodic distributions by calculating and making regular withdrawal requests (however, this approach may have tax implications).

Investment options

This section of the TMD is relevant to consumers who chose one or more investment options when entering the Product (that is, consumers who do not rely on the default investment option). This Product is likely to be consistent with a target market of consumers that wish to choose their own tolerance for risk.

The risk level of each investment option is disclosed in the PDS and application form and is typically based on the risk rating applied to the investment option by the relevant issuer as described in each underlying investment option target market determination. The issuers of the investment options use the Standard Risk Measure (SRM) to estimate the likely number of negative annual returns for the product over a 20 year period, using the guidance and methodology outlined in the Standard Risk Measure Guidance Paper for Trustees (note the bands in the SRM guidance may differ from the bands by the issuer of the investment option and described in the relevant investment option target market determination). See <https://www.fsc.org.au/web-page-resources/fsc-guidance-notes/2316-fsc-gn29>.

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. The SRM methodology may also be supplemented by considering other risk factors. For example, some products may use leverage, derivatives or short selling, may have liquidity or withdrawal limitations, 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.

A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.

Low	The consumer has a conservative or low risk appetite, 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. Consumer typically prefers defensive assets such as cash and fixed income.
Medium	The consumer has a medium risk appetite, 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. Consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.
High	The consumer has a high risk appetite and can accept higher potential losses (e.g. has the ability to bear up to 6 negative returns over a 20-year period (SRM 5 or 6)) in order to target a high target return profile. 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.
Very high	The consumer has a 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 6 or 7) and possibly other risk factors, such as leverage). Consumer typically prefers growth assets such as shares, property and alternative assets.
Extremely high	The consumer has an extremely high-risk appetite and is willing to accept significant volatility and losses, and seeks to obtain accelerated returns (potentially in a short time frame). Consumer typically 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).

Investment diversification

Consumers can select from a menu of investment options enabling a diversified portfolio of assets. Where the consumer has selected a diversified investment option(s) further diversification might not be required.

Where consumers invest in a sector specific fund, they should consider diversifying their investment across multiple investment choices within the Product's investment menu or otherwise across their investable assets.

For all investment options that have a High to Extremely High Risk and Return profile, consumers also should consider diversifying across multiple investment options within the Product's investment menu or otherwise across their investable assets. The investment options should be assessed against the consumer's needs and objectives for the relevant portion of their portfolio, rather than the consumer's portfolio as a whole.

Appropriateness requirements

Note: This section relates to the requirements of s994B(8)(b) of the Act and RG 274.64–66.

Explanation of consistency of key attributes with TMD

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 investors in the target market because the Product:

- is a long-term 'tax paid' investment product with an investment menu with a range of risk and return characteristics;
- allows a consumer to establish a long-term regular savings plan, helping them reach a long-term savings goal for a key life event;
- enables a consumer to select from a range of investment options to achieve investment returns without increasing their assessable income or impacting their entitlement to some social security benefits; and
- allows a consumer to nominate beneficiaries outside a consumer's estate to provide certainty for estate planning.

Distribution Conditions/Restrictions

Note: This section relates to the requirements of s994B(5)(c) of the Act.

Distribution conditions	Distribution condition rationale	Who this condition applies to
Distributors must require new investors to receive, read and confirm they understand the disclosure under which an offer has been made.	This Distribution Condition is likely to enhance distribution in line with the products likely target market because Distributors must take reasonable steps to ensure that their distribution activities will or are likely to result in retail product distribution conduct to consumers that are informed and aware of the required disclosure.	This Distribution Condition applies to all Distributors who intend to engage in retail distribution of the product
Distributors are required to utilise wording prepared by the Issuer, either in its entirety or as a complete excerpt. Alternatively, they must seek approval from the Issuer for any promotional material, including advertising, that deviates from the Issuer-prepared wording.	This Distribution Condition is likely to minimise the extent to which a Distributor promotes the Product in a manner that may misrepresent it or potentially involve marketing to individuals beyond the target market.	This Distribution Condition applies to all Distributors.
Investors seeking to invest in the Product directly without the assistance of a licensed financial adviser in the Product are required to adhere to the following steps: 1. Complete the Application Form, explicitly confirming their thorough review of the PDS. 2. Provide sufficient information in the Application Form, to demonstrate their individual needs and objectives are aligned with the key attributes of the Product. Lifeplan reserves the right to decline an application based on the information provided in the Application Form. In such instances, the investors will be promptly notified of the decision.	The Distribution Condition is designed for direct investors and is intended to enhance the likelihood of their being aligned with the target market for the following reasons: 1. Prior Information: Investors are required to read the PDS which provides information regarding the characteristics of the Product before they apply for the Product. 2. Application Assessment: Lifeplan retains the discretion to decline an application if an investor fails to demonstrate that their individual needs and objectives are aligned with the key attributes of the Product.	This Distribution Condition applies to all unadvised investors.
For those investors who have applied with the assistance of a licensed financial adviser, the licensed financial advisers must be authorised to provide personal financial product advice in respect of, and deal in, investment life insurance products &/or investment-linked life policies. Licensed financial advisers must confirm; 1. they have provided personal financial advice to the investor to the financial product sought to be acquired by the application; and 2. the issuance of the financial product sought to be acquired by the application is necessary to implement that personal financial advice. Lifeplan reserves the right to decline an application based on the information provided in the Application Form. In such instances, the investors will be promptly notified of the decision.	The Distribution Condition is designed to confirm that the licensed financial adviser has provided financial advice in relation to the application, is appropriately authorised to do so, and the issuance of the Product is necessary to implement that personal financial advice.	This Distribution Condition applies to all investors who are recommended to apply for or acquire the Product by a licensed financial adviser.

Appropriateness requirements – distribution conditions

Note: This section relates to s994B(8)(a) of the Act and RG 274.100.

The Issuer has assessed the Distribution Conditions and formed the view that the Distribution Conditions will make it more likely that consumers who acquire the Product will be in the target market because:

- the Issuer's distribution channel for this Product is restricted to direct distribution by the Issuer; licensed financial advisers; and authorised representatives of the Issuer that have entered into a written agreement with the Issuer in relation to the distribution of the Product;
- employees of the Issuer involved in the distribution of this Product will be required to follow the Issuer's internal procedures for the approval of applications for the Product;
- financial advisers involved in the distribution of this Product must be licensed and are required to have reviewed and considered the TMD before making a recommendation to a client to acquire the Product;
- promotional material prepared by Distributors that are authorised representatives of the Issuer must be approved by the Issuer, ensuring that these Distributors will not be promoting the Product in a way that could misrepresent the Product or result in marketing being directed to potential consumers outside the target market; and
- compliance with accreditation requirements is likely to result in distribution to consumers who are likely to be in the target market through the imposition of contractual protections relevant to training obligations and compliance with relevant law.

Review Triggers

Note: This section relates to the requirements of s994B(5)(c) of the Act.

A Review Trigger will arise where the Issuer of this TMD has determined that any of the following has occurred:

- ASIC reportable significant dealing outside of the TMD;
- significant or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) regarding the Product where the Issuer considers this reasonably suggests that this TMD is no longer appropriate;
- material change to key product attributes, terms and/ or conditions where the Issuer considers this reasonably suggests that this TMD is no longer appropriate;
- the use of Product Intervention Powers, regulator orders or directions in relation to the distribution of this Product where the Issuer considers this reasonably suggests that this TMD is no longer appropriate;
- a significant breach event relating to the design or distribution of this product where the Issuer considers this would reasonably suggest that (i) this Product is unsuitable for a particular cohort of consumers and (ii) the TMD may no longer be appropriate; or
- a significant or unexpectedly high number of clients do not receive discounted tax treatment upon withdrawal (e.g. withdrawal prior to the 8th year of the investment being initiated).

Maximum period for reviews

Note: This section relates to the requirements of s994B(5)(d) and (f) of the Act.

Review periods	Maximum period for review
Initial review	1 year and 3 months
Subsequent review	3 years and 3 months

The review period allows for the collection of data for 1 year/3 years, plus three months for the completion of the review.

Distributor Information Reporting Requirements

Note: This section relates to the requirements of s994B(5)(g) and (h) of the Act.

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.

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.

Dealings outside this TMD may be significant because:

- 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).

In each case, the Distributor should have regard to:

- the nature and risk profile of the Product (which may be indicated by the Product's risk rating or withdrawal 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.

Objectively, a Distributor may consider a dealing (or group of dealings) outside the TMD to be significant if it constitutes more than a third of the distributor's total retail product distribution conduct in relation to the product over the reporting period.

Regulated person(s)	Requirement	Reporting deadline
All Distributors	Complaints (as defined in section 994A(1) of the Act) where the nature of the complaints relate to the Product. The Distributor should provide all the content of the complaint, having regard to privacy.	Quarterly *
All Distributors	Significant dealing outside of the TMD under s994F(6) of the Act.	As soon as practicable but no later than 10 business days after Distributor becomes aware of the significant dealing.

* Quarterly reporting is due 10 business days after the end of the March, June, September and December quarters.

Distributors must report to Lifeplan Australia Friendly Society Limited using the method specified on the website:

australianunity.com.au/wealth/distributor-complaints