

Target Market Determination

SPIRE MULTIFAMILY GROWTH AND INCOME FUND FOUNDERS (AUD) HEDGED CLASS

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 at the end of this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained by accessing <https://www.eqt.com.au/insto/>.

Target Market Summary

This product is intended for use as a minor or satellite allocation for a consumer who is seeking capital growth and income distributions and has a 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 minimum 5 year investment timeframe and who is unlikely to need to withdraw their money on less than one quarter period's notice. This product is classified as a Fund of Hedge Fund under ASIC Regulatory Guide RG240 and may have complex features. This product is likely to be suitable for investors who have received personal advice.

FUND AND ISSUER IDENTIFIERS

Issuer	Equity Trustees Limited	ISIN Code	AU60ETL48468
Issuer ABN	46 004 031 298	Market Identifier Code	
Issuer AFSL	240975	Product Exchange code	
Fund manager	Spire Capital Ltd	TMD issue date	12.03.2024
TMD contact details	DDOCompliance@eqt.com.au	TMD Version	4
Fund name	Spire Multifamily Growth and Income Fund Founders (AUD) Hedged Class	Distribution status of fund	Available / Current
ARSN	646054319		
APIR Code	ETL4846AU		

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:

In target market

See issuer instructions

Not in target market

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. This guidance only applies where a product is held as part of a diversified portfolio.



Consumer Attributes	TMD Indicator	Product description including key attributes
Consumer's investment objective		
Capital Growth	In target market	The Fund typically invests in a portfolio of select US based Multifamily assets. The Fund is likely to be suitable for investors seeking capital growth and income over the longer term. The Fund's investment objective is to provide investors with annual income and attractive capital appreciation. The Fund has no stated benchmark.
Capital Preservation	Not in target market	The Fund is not designed for investors seeking regular income payments. While the Fund expects to pay its distributable income each year, there is no guarantee that any income will be generated.
Income Distribution	Not in target market	The Fund expects to distribute any net income on a semi-annual basis. Distributions of income will depend on the receipt by the Fund of distributions from the Underlying Fund and Underlying ETF. There is no guarantee that any income will be generated. The Fund is not designed for investors seeking regular income payments.
Consumer's intended product use (% of Investable Assets)		
Solution/Standalone (up to 100%)	Not in target market	The Fund will invest primarily in the Blocker Fund, which will then invest in the Underlying Fund which predominantly invests in a portfolio of select US based Multifamily assets. The Fund will also invest in the Underlying ETF to provide liquidity within the Fund for the purpose of maintaining target investment level and satisfying redemption requests. The target investment allocation is as follows:
Major allocation (up to 75%)	Not in target market	- Underlying Fund 80%; - Underlying ETF 15%; and - Cash Amounts 5%.
Core component (up to 50%)	Not in target market	The Fund has no borrowings itself but has no control over the level of gearing at the Underlying Fund level, which has a maximum gearing limit of 50% loan to value ration (LTV). It is the intention of the Underlying Fund to maintain the overall level of gearing to no more than approximately 5% LTV.
Minor allocation (up to 25%)	In target market	The Fund (including the Underlying Fund and Underlying ETF) will not engage in short selling. The Fund will not use derivatives to gain exposure to certain assets or asset classes. The Underlying Fund may use derivatives in the form of interest rate caps or swaps, to hedge its risk against interest rate increases on loans used to acquire property assets. For the Hedged Class, derivatives will be used for currency hedging purposes to mitigate the impact of changes in exchange rates between the AUD and the USD.
Satellite allocation (up to 10%)	In target market	The Fund would typically be considered to have a Medium level of portfolio diversification.
Consumer's investment timeframe		
Minimum investment timeframe	5	The minimum suggested timeframe for holding investments in the Fund is 5 years.
Consumer's Risk (ability to bear loss) and Return profile		
Low	Not in target market	This Fund is considered high risk. It would likely be suitable for investors who have a high risk appetite, can accept high volatility and potential losses and seeks high returns (typically over a medium or long timeframe). Typically suited to investors who prefer growth assets (for example, shares and property). The Fund is classified as a hedge fund under ASIC Regulatory Guide 240.
Medium	Not in target market	
High	In target market	
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	Investors can submit an application to withdraw their investment by 5pm (Sydney time) on the 20th calendar day, or preceding Business Day in the event that the 20th is a New South Wales public holiday. Funds will generally be available by the 20th Business Day in the following month, where the Issuer has sufficient cash to pay the withdrawal proceeds. However the Issuer has discretion to make payment up to 1074 days following acceptance of a request. In certain circumstances the Fund may restrict redemption requests including by way of spreading redemption requests over a longer period of time (e.g. when redemption requests in any given quarter exceed 5% of Units on issue), or by making periodic redemption offers or suspending redemptions. When the Fund is not Liquid, investors may only request a redemption under the terms of any withdrawal offer made by the Responsible Entity. The Responsible Entity is not required to make a withdrawal offer where the Fund is not Liquid. The Fund is not suitable for investors who need regular access to their capital. Neither the responsible entity nor the investment manager provides any guarantee concerning the liquidity of the Fund or the ability of an investor to withdraw its investment.
Within one month of request	In target market	
Within three months of request	In target market	
Within one year of request	In target market	
Within 5 years of request	In target market	
Within 10 years of request	In target market	
10 years or more	In target market	
At issuer discretion	Not in target market	Not applicable

Distribution conditions/ restrictions		
Distribution conditions	Distribution condition rationale	Distributors this condition applies to
Only suitable for distribution through dealing if distributor is reasonably satisfied that distribution is necessary to implement personal advice given to the consumer. Suitable for dealing through investment, super or wrap platforms, and investor directed portfolio service (IDPS) or IDPS-like scheme or other trading platform.	Due to the complex nature and risk level of the Fund it is considered reasonably likely to reach the target market via a personal advice channel. 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 dealing conduct being consistent with this TMD.	All distributors

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	15 months
Subsequent review	15 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 the Issuer using the method specified on this website: www.eqt.com.au/DDOreporting. This link also provides contact details relating to this TMD for the Issuer.

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Definitions

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 very <i>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.
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).

Term	Definition
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 may use the Standard Risk Measure (SRM) as an input to the assessment of the risk and return profile of the product, but may not necessarily be the only input used. The SRM estimates the likely number of negative annual returns for a product over a 20 year period. The SRM may be supplemented by other risk factors, such as the potential size of a negative or positive return, liquidity or withdrawal limitations, underlying investments with valuation risks or risks of capital loss, the use of leverage or short selling, or otherwise may have complex structures. A consumers desired product return profile will generally take into account the impact of fees, costs and taxes.</p>	
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 very high 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>

Term	Definition
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 extremely high volatility and potential losses (eg. has the ability to bear more than 7 negative returns over a 20 year period), and • seeks to maximise 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>

Consumer's need to access capital

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 and likely realisable value on market should be considered, including in times of market stress.

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. 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 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 (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 core component 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.
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