

Target Market Determination

JOSEPH PALMER EX-100 AUSTRALIAN EQUITIES 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 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/> or you can request a copy free of charge by calling Joseph Palmer on +61 2 9233 2433 or by calling the Responsible Entity.

Target Market Summary

This product is likely to be appropriate for a consumer seeking capital growth over the long-term, with an investment timeframe of seven years or more. This product is likely to be suitable for a consumer with a high risk and return profile, and as it invests in a single asset class, should only be considered for a portion of a diversified portfolio. This product may experience high levels of volatility and therefore is unlikely to be suitable for a consumer seeking capital preservation and/or who has a shorter investment timeframe than seven years.

FUND AND ISSUER IDENTIFIERS

Issuer	Equity Trustees Limited	ISIN Code	
Issuer ABN	46 004 031 298	Market Identifier Code	
Issuer AFSL	240975	Product Exchange Code	
Fund manager	Joseph Palmer & Sons	TMD issue date	14.04.2025
TMD contact details	DDOCompliance@eqt.com.au	TMD Version	1
Fund name	Joseph Palmer Ex-100 Australian Equities Fund	Distribution status of fund	Available / Current
ARSN	679 443 960		
APIR Code	ETL8181AU		

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
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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 aims to achieve positive returns in excess of the S&P/ASX Small Ordinaries Accumulation Index over rolling seven year periods by investing in small capitalisation Australian companies which are predominantly outside of the top 100 ASX listed companies as defined by market capitalisation. Where considered appropriate, the Fund may also invest in Listed Investment Companies or Trusts that predominantly invest in small capitalisation companies which are outside of the top 100 ASX listed companies. The Fund usually distributes income semi-annually at the end of June and December. Distributions are calculated effective the last day of each distribution period and are normally paid to investors as soon as practicable after the distribution calculation date.
Capital Preservation	Not in target market	
Income Distribution	See issuer instructions	
Consumer’s intended product use (% of Investable Assets)		
Solution/Standalone (up to 100%)	Not in target market	The Fund provides exposure to small capitalisation Australian companies that are predominantly outside the top 100 ASX listed companies by market capitalisation. This provides the ability to gain exposure to businesses earlier in their development before the market has priced in all of the potential value of a company. The portfolio diversification of the Fund is Low. The Fund may also hold up to 25% of the Fund's assets in cash or cash equivalents.
Major allocation (up to 75%)	Not in target market	
Core component (up to 50%)	Not in target market	
Minor allocation (up to 25%)	In target market	
Satellite allocation (up to 10%)	In target market	
Consumer’s investment timeframe		
Minimum investment timeframe	7	The minimum suggested timeframe for holding investments in the Fund is 7 years.
Consumer’s Risk (ability to bear loss) and Return profile		
Low	Not in target market	The Fund has a high risk level. There is a risk investors may lose some or all of their investment. Higher risk investments tend to fluctuate in the short term but can produce higher returns than lower risk investments over the longer term.
Medium	Not in target market	
High	In target market	
Very high	Not in target market	
Extremely high	Not in target market	
Consumer’s need to access capital		
Within one week of request	In target market	The Issuer will generally allow an investor to access their investment within 7 days of acceptance of a withdrawal request by transferring the proceeds of the redemption to the investors' nominated bank account. However, Equity Trustees is permitted to reject withdrawal requests, and also to make payment up to 30 days after acceptance of the request (which may be extended in certain circumstances) as outlined in the Constitution and Reference Guide.
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
<p>The product may be distributed to investors by a Licensee or its Authorised Representatives (as defined in the Act) (known as financial advisers) who provide personal financial product advice. Financial Advisers have their own legal obligations that must be satisfied in connection with the provision of personal financial product advice.</p> <p>By application to the Issuer, provided the amount to be invested (and maintained) is at least \$5,000 (or such other Minimum Investment Amount as may be accepted by the Issuer in its absolute discretion). The investor will acquire the product directly via the Issuer's website, www.eqt.com.au/insto, by completing the Application Form in accordance with the PDS. The investor completing the Application Form will be asked a series of questions to assist the Issuer in understanding whether the investor is in the target market.</p> <p>This product may be made available to persons investing through investment or superannuation platforms, wrap products, Investor Directed Portfolio Services (IDPS), IDPS-like schemes, a nominee or custody service or any other trading platform (platform) as authorised by the Responsible Entity.</p>	<p>The Issuer considers that this distribution condition will cause it to be likely that investors who acquire the product will be in the target market for the product, or the product will otherwise be appropriate for them because the financial adviser providing personal advice must:</p> <p>(a) take into account the investor's personal objectives, financial situation and needs; and</p> <p>(b) comply with the best interests duty and related obligations under Part 7.7A of the Act.</p> <p>It has been determined that this distribution condition will cause it to be likely that investors who acquire the product are in the class of investor 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.</p> <p>The Issuer considers that this distribution condition will cause it to be likely that investors who acquire the product are in the target market because the platform operator will have an arrangement with the Issuer governing their relationship with the Issuer and noting that platform operators, as distributors, are required to take reasonable steps that will, or are likely to, result in distribution of the product being consistent with the TMD.</p>	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. Distributors must report to the Issuer by contacting DDOCompliance@eqt.com.au.

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