

# Target Market Determination

For Allan Gray Investments provided by OneVue Wealth Services Ltd (ABN 70 120 380 627)  
(AFSL 308868)

## 1. About this document

### When to use this target market determination

This target market determination (TMD) seeks to offer investors, financial advisers, promoter and staff with an understanding of the class of investors for which this product has been designed, having regard to the objectives, financial situation and needs of the target market.

This document is not to be treated as a full summary of the product's risks and features and is not intended to provide financial advice. Investors and financial advisers must refer to the Product Disclosure Statement (PDS) and any supplementary documents when making a decision about this product.

### Product Disclosure Statement to which this target market determination applies

This TMD applies to *Allan Gray Investments* referred to in the following *Combined IDPS Guide and Product Disclosure Statement (PDS)* and *Managed Account Model Portfolio Guide*:

- [Allan Gray Investments Combined IDPS Guide and Product Disclosure Statement](#)
- [Managed Account Model Portfolio Guide](#)

### Important Dates

Date from which this target market determination is <b>effective</b>	1 February 2022
Date when this target market determination was <b>last reviewed</b>	19 January 2022
Date when this target market determination will be <b>next reviewed</b>	30 September 2022

Terms not defined within this document bear the meaning set out on in the Combined Guide

## 2. Class of investors that fall within this target market

The information below summarises the overall class of investors that fall within the target market for Allan Gray Investments, based on the product's key attributes and the objectives, financial situation and needs that it has been designed to meet.

Allan Gray Investments has been designed for investors whose likely objectives, financial situation and needs (as listed below) are aligned with the product (including the key attributes).

Allan Gray Investments is for those who:

- Are over the age of 18,
- Are either individuals, trusts, partnerships, self-managed super funds (SMSFs), companies or deceased estates.
- Are Australian residents (unless otherwise approved),
- Are seeking a comprehensive investment solution that offers the choice of investing in one or more investment options, research, administration and consolidated reporting services,
- Want to manage and track their investments held through the Allan Gray Investments online, and
- Are either investing directly or through a financial adviser.

Investors who apply for Allan Gray Investments without receiving personal advice will be asked a number of questions about their investment objectives, needs and financial situation. The answers will be used to form the default investment menu available to those investors.

### **Excluded class of investors**

Allan Gray Investments has not been designed for investors who:

- Want to invest their super savings in a superannuation fund other than a SMSF,
- Are looking for a default investment option (MySuper investment option), or
- Want administration and consolidated tax reporting capability across a range of directly held assets.

### **Product description and key attributes**

The key eligibility requirements and product attributes of Allan Gray Investments are:

#### Key eligibility requirements

- It is available to investors over the age of 18.
- Investors must be Australian residents.
- To invest in Allan Gray Investments, investors must have a cash hub account open at all times and maintain a minimum balance of \$2,500.

#### Key attributes (fees, terms and features)

- It provides the choice of investing in different investment options which include:
  - Cash hub which is an interest bearing transaction account which holds the investors available cash for investment in the product's investment options, receives income and distributions from investments and pays fees, costs, tax and other deductions,
  - Managed funds,
  - Model portfolios managed by professional investment managers comprising of the following:
    - ASX listed securities,
    - International listed securities on selected foreign exchanges made available by OneVue Wealth Services, or
    - Managed funds,

- ASX listed securities comprising of the following:
  - Ordinary shares,
  - Exchange traded funds (ETFs),
  - Exchange traded products (ETPs),
  - Listed investment companies (LICs),
  - Interest rate securities,
  - Hybrid securities, and
  - Real Estate Investment Trusts (REITs), and
- Term deposits.
- It also enables easy and cost-effective access to Allan Gray managed funds with no administration fees applied on investments in those Allan Gray managed funds.
- The minimum investment per managed account model portfolio varies depending on the investment and investors must maintain the minimum investment balance in each model portfolio at all times.
- There is a minimum investment amount of \$1,000 required for ASX listed securities.
- The minimum investment amount of \$1,000 for per managed fund.
- A minimum withdrawal of \$1,000 applies for managed funds, managed account model portfolios and ASX listed securities. Minimum withdrawal amounts for international listed securities within a managed account model portfolio is \$10,000.
- Investors and their financial advisers can manage and track their investments held through the Allan Gray Investments online via the Secure Online Portal.
- Investors can establish a regular investment plan whereby they can invest on a monthly, quarterly (February, May, August and November), half-yearly (May and November) or yearly (May) frequency in investment options offered by Allan Gray Investments.
- Investors can establish a regular payment (drawdown) plan whereby they can choose to receive a regular payment by drawing down capital from their selected investments and/ or available cash from their cash hub. They can choose a monthly, quarterly (February, May, August and November), half-yearly (May and November) or yearly (May) payment schedule.
- Fees associated with the Allan Gray Investments include the following:
  - Asset based administration fee which is charged on the investor's average daily balance (other than Allan Gray Managed Funds) in the Allan Gray Investments account,
  - Promoter fees are now included in the asset based administration fee which is charged on the investor's average daily balance of investments other than Allan Gray managed funds,
  - Account keeping fee which is charged on all balances,
  - International listed securities fees for international securities within managed account model portfolios,
  - Investment fees for the cash hub, managed funds, managed account model portfolios and ASX listed securities such as ETFs and LICs,
  - Activity based fees which include brokerages fees and transfer fees, and
  - Adviser service fees to be paid to the investor's financial adviser.

Please refer to the [Allan Gray Investments Guide](#) for further details about the fees associated with Allan Gray Investments.

## Objectives, financial situation, and needs

The table below sets out the class of investors that each investment option within Allan Gray Investments has been designed for.

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

In target market	Potentially in target market	Not considered in target market
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Generally, an investor is unlikely to be in the target market for the product if:

- **one or more** of their investor attributes correspond to a **red** rating, or
- **three or more** of their investor attributes correspond to an **amber** rating.

Definitions of the terms used here are in the Definitions section below.

Investment options	Investor's investment objective			Investor's investment timeframe			Investor's risk (ability to bear loss) and return profile				Investor's intended product use (% of Investable Assets)		
<b>Model portfolios type: International Shares</b>													
PPM Global Equities Growth	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Watershed International Share	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
<b>Model portfolios type: Australian Listed Fixed Income</b>													
JBWere Listed Fixed Income	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Watershed Income	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)

Model portfolios type: A-REITs													
DNR Capital Australian Listed Property Trust	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Model portfolios type: Australian Shares													
DNR Capital Australian Equities High Conviction	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
DNR Capital Australian Equities Income	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
JBWere Intermediary Income	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Lonsec Core	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Ralton Australian Shares	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Ralton High Yield Australian Shares	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)

## CONTRARIAN INVESTING

Ralton Leaders	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
SG Hiscock 20	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Watershed Australian Share	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
<b>Model portfolios type: Australian Shares - small/mid cap</b>													
Ralton Smaller Companies	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Watershed Emerging Leaders	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
<b>Model portfolios type: Multi Asset - Balanced</b>													
Dynamic Asset Wealth Protector	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Proactive Portfolios Balanced	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)

Watershed Balanced	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
YX Ball Balanced	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
<b>Model portfolios type: Multi Asset - Cautious</b>													
Dynamic Asset Cash Plus	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Dynamic Asset Short-Term	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Proactive Portfolios Conservative	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Watershed Conservative	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
YX Ball Conservative	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)

Model portfolios type: Multi Asset - Growth													
Proactive Portfolios Growth	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Watershed Growth	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
YX Ball Growth	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Model portfolios type: Multi Asset - Moderate													
Dynamic Asset Mid-Term	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
YX Ball Moderate	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Model portfolios type: Multi Asset - Aggressive													
Dynamic Asset Wealth Builder	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Proactive Portfolios High Growth	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)



Watershed High Growth	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
YX Ball High Growth	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)

Model portfolios type: Multi Asset - Income													
Proactive Portfolios Income	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
<b>Cash hub</b>													
	Capital Growth	Capital Preservation	Income Generation	Short (<=2 years)	Medium (<=8 years)	Long (> 8 years)	Low	Medium	High	Very High	Solution/ Standalone (75 -100%)	Core component (25 - 75%)	Satellite/ small allocation (<25%)
Managed funds													
Investors can access a broad range of managed funds issued by leading investment managers. Each managed fund has its own TMD document and disclosure document issued by its responsible entity which can be accessed on their relevant websites. The list of managed funds is available in the Investment Menu of Allan Gray Investments.	Managed funds offered through Allan Gray Investments have different investment objectives and can cater to different objectives of investors including capital preservation, income generation and capital growth.			Managed funds have different investment timeframes depending on the type of managed fund.			Managed funds have different risk profiles depending on the type of managed fund.				Managed funds can be used as standalone investment solution (75-100%) or as a core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments depending on the investor's investment objective, risk appetite and investment time frame.		

ASX listed securities				
<p>The list of ASX listed securities is available in the Investment Menu of Allan Gray Investments. The listed investment products and fixed income securities have their own TMD document and disclosure documents and have different investment objectives, member time horizons, risk profiles, benchmarks and minimum investment requirements.</p>	<p>For investors who want to directly access ASX listed securities including ordinary shares, property trusts, listed investment products (including exchange traded funds) and fixed income securities (including hybrid securities).</p>	<p>ASX listed securities may suit investors of varying risk tolerances or investment horizons ranging from less than 1 year to 8+ years of negative investment returns in a 20 year period whilst seeking investment returns that vary from very low to high after fees and taxes.</p>	<p>ASX listed securities are suitable for investors who have timeframes from less than 2 years to greater than 8 years or who are combining investment options in order to create a diversified portfolio.</p>	<p>ASX listed securities can be used as standalone investment solution (75-100%) or as a core (25-75%) or satellite component (&lt;25%) of an investor's broader portfolio of investments depending on the investor's investment objective, risk appetite and investment time frame.</p>
Term deposits				
<p>Term deposits with a number of banks can be invested via Allan Gray Investments. These term deposits have their own TMD document and disclosure documents which can be accessed on the secure online portal. The list of term deposits is available in the Investment Menu of Allan Gray Investments.</p>	<p>For investors who are:</p> <ul style="list-style-type: none"> <li>○ seeking nil to very low investment returns after fees and taxes,</li> <li>○ combining investment options in order to create a diversified portfolio, and</li> <li>○ prepared to wait a minimum of 30 days if they are seeking to withdraw prior to the maturity date.</li> </ul>	<p>Term deposits are suitable for investors who have a short investment timeframe of less than 2 years.</p>	<p>Term deposits are designed to be suitable for investors who have a low risk tolerance.</p>	<p>Term deposits can be used as a standalone investment solution (75-100%) or as a core (25-75%) or satellite component (&lt;25%) of an investor's broader portfolio of investments.</p>

## Definitions

Term	Definition
<b>Investor's investment objective</b>	
Capital Growth	The investor seeks to invest in an investment option designed to generate capital return. The investor prefers exposure to growth assets (such as shares or property) or otherwise seeks an investment return above the current inflation rate.
Capital Preservation	The investor seeks to invest in an investment option to reduce volatility and minimise loss in a market down-turn. The investor prefers exposure to defensive assets (such as cash or fixed income securities) that are generally lower in risk and less volatile than growth investments.
Income Generation	The investor seeks to invest in an investment option designed to distribute regular and/or tax-effective income. The investor prefers exposure to income-generating assets (typically, high dividend-yielding equities, fixed income securities and money market instruments).
<b>Investor's intended product use (% of Investable Assets)</b>	
Solution/Standalone (75-100%)	The investor intends to hold the investment as either a part or the majority (up to 100%) of their total <i>investable assets</i> (see definition below). The investor typically prefers exposure to a product with at least High <i>portfolio diversification</i> (see definitions below).
Core Component (25-75%)	The investor intends to hold the investment as a major component, up to 75%, of their total <i>investable assets</i> (see definition below). The investor typically prefers exposure to a product with at least Medium <i>portfolio diversification</i> (see definitions below).
Satellite (<25%)	The investor intends to hold the investment as a smaller part of their total portfolio, as an indication it would be suitable for up to 25% of the total <i>investable assets</i> (see definition below). The investor is likely to be comfortable with exposure to a product with Low <i>portfolio diversification</i> (see definitions below).
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.
<b>Investor's intended investment timeframe</b>	
Low	Single asset class, single country, low or moderate holdings of securities - e.g. high conviction Aussie equities.
Medium	1-2 asset classes, single country, broad exposure within asset class, e.g. Aussie equities "All Ords".
High	Highly diversified across either asset classes, countries or investment managers, e.g. Australian multi-manager balanced fund or global multi-asset product (or global equities).
<b>Investor's intended investment timeframe</b>	
Short ( $\leq 2$ years)	The investor has a short investment timeframe and may wish to hold investments for two years or less.
Medium ( $\leq 8$ years)	The investor has a medium investment timeframe and may wish to hold investments for eight years or less.
Long ( $> 8$ years)	The investor has a long investment timeframe and may wish to hold investments for eight years or longer.
<b>Investor's Risk (ability to bear loss) and Return profile</b>	
Low	The investor is conservative or low risk in nature, seeks to minimise potential losses (e.g. has the ability to bear negative annual returns of 0.5 to less than 1 year over a 20 year period) and are comfortable with a low target return profile. Investor typically prefer defensive assets such as cash and fixed income.
Medium	The investor is moderate or medium risk in nature, seeking to minimise potential losses (e.g. has the ability to bear negative annual returns of 2 to less than 3 years over a 20 year period) and comfortable with a moderate target return profile. Investor 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 investor is higher risk in nature and can accept higher potential losses (e.g. has the ability to bear negative annual returns of 4 to less than 6 years over a 20 year period) in order to target a higher target return profile. Investor 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 investor has a more aggressive or very high risk appetite, seeks to maximise returns and can accept higher potential losses (e.g. have the ability to bear negative annual returns of 6 or greater years over a 20 year period and possibly other risk factors, such as leverage. Investor typically prefers growth assets such as shares, property and alternative assets.

### **Consistency between target market and the product**

Allan Gray Investments is likely to be consistent with the likely objectives, financial situation and needs of the class of investors in the target market because:

- the investor is exercising choice in relation to investment options which meet their needs,
- the investors (who have not received any personal advice) will be answer a number of questions in the application form for Allan Gray Investments and their responses will result in a predetermined investment menu to ensure available investment options are appropriate for their investment needs,
- the investor is using the Investor Service to access investments that involve risk and have the potential for capital loss, and
- the investor is able to invest directly or via a financial adviser.

### **3. How this product is to be distributed**

#### **Distribution channels**

Allan Gray Investments been designed to be distributed:

- Through a financial adviser registered with OneVue Wealth, and
- Through direct investment by investors who can invest via <https://www.allangray.com.au/b/general-investment/>

#### **Distribution conditions**

Allan Gray Investments should only be distributed under the following circumstances:

- the financial adviser of the investor must be registered with OneVue Wealth.
- If the investor is above the age of 18 and an Australian resident, and
- If the investor has at least \$2,500 to open a cash hub account in Allan Gray Investments.

#### **Adequacy of distribution conditions and restrictions**

- Allan Gray Investments can be distributed to Investors as part of personal advice recommendations.
- If an investor is investing in Allan Gray Investments through a financial adviser, their financial adviser must be registered with OneVue Wealth and appointed as their nominated representative to operate their Allan Gray Investments account on their behalf.
- For investors investing directly without an adviser, a number of questions are asked in the application form to sign up to Allan Gray Investments. These questions seek to ensure that the distribution conditions are met, therefore making it likely that investors who invest in the underlying investment options of the product are in the class of investors for which they have been designed for.

This is based on an assessment of the distribution conditions and restrictions and that they are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

### **4. Reviewing this target market determination**

We will review this target market determination in accordance with the below:

<b>Initial review</b>	30 September 2022
<b>Periodic review</b>	On an annual basis starting 30 September 2022
<b>Review triggers or events</b>	<p>Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited to):</p> <ul style="list-style-type: none"> <li>○ a material change to the design or distribution of the product, including related documentation;</li> <li>○ occurrence of a significant dealing;</li> <li>○ distribution conditions found to be inadequate;</li> <li>○ external events such as adverse media coverage or regulatory attention; and</li> <li>○ significant changes in metrics, including, but not limited to, complaints and losses suffered by investors.</li> </ul>

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

## **5. Reporting and monitoring this target market determination**

We may collect the following information from our distributors in relation to this TMD.

<b>Complaints</b>	<p>Distributors must report all complaints in relation to the product(s) covered by this TMD on a monthly basis.</p> <p>This will include the substance of complaints and general feedback relating to the product and its performance.</p>
<b>Significant dealings</b>	<p>Distributors must report if they become aware of a significant dealing in relation to this TMD within 10 business days.</p> <p>A significant dealing includes:</p> <ul style="list-style-type: none"> <li>○ 20% of investors who have invested in the product but are not in the target market, including the proportion of investors who are part of a class of investors that have been specifically excluded from the target market,</li> <li>○ Potential/actual harm to investors if investors outside the target market invest in the product,</li> <li>○ Inconsistency of distribution conditions with the TMD, and</li> <li>○ Time period when members outside the target market invested in the product.</li> </ul> <p>Distributors will report transaction data and outcomes from sale practices monitoring within quarterly reporting period.</p>