

Target Market Determination

5 October 2021

This Target Market Determination (TMD) has been prepared and issued by IOOF Investment Management Limited (Trustee, IIML) (ABN 53 006 695 021, AFSL 230524) as the issuer of Shadforth Portfolio Service - Super, Unique Superannuation Identifier SMF0126AU.

This TMD seeks to offer clients and distributors an understanding of the class of clients for which Shadforth Portfolio Service - Super has been designed, having regard to the objectives, financial situation and needs of the target market. It applies to the Shadforth Portfolio Service - Super product referred to in the Product Disclosure Statement (PDS) available at www.sfg.com.au

It is **not** a PDS and is **not** to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. This document does not take into account any person's individual objectives, financial situation or needs. Clients must refer to the PDS and any supplementary documents when making a decision about the product.

Shadforth Portfolio Service – Super is a comprehensive superannuation solution designed for clients working with a financial adviser. It offers an extensive range of investment choices to help the client design a unique portfolio that is tailored to their personal financial objectives.

Target Market

Suitable for clients who:	Not suitable for clients who:
<ul style="list-style-type: none"> are financially knowledgeable and like the freedom to tailor their superannuation solution require a superannuation solution that can be held until and after retirement are receiving advice from the Shadforth Financial Group have an understanding of the risks associated with investing want to save for their retirement by contributing to super prefer a wide and versatile range of investment choices and want to invest in one or a combination of the investment options which are made available through Shadforth Portfolio Service - Super may want the option of insurance cover in super want the flexibility to monitor their super as much as they'd like by checking their contributions, balance and transactions online. 	<ul style="list-style-type: none"> are looking for a MySuper product are not receiving personal financial advice from the Shadforth Financial Group when applying for an account are totally risk averse and cannot tolerate any losses with their investments. need access to their investment capital before retirement have not received the PDS within Australia want the option to hold Death and Total and Permanent Disability (TPD) or Income Protection in their super account but do not meet the eligibility requirements for such insurance as set out in the "Insurance attributes" section in this document (e.g. is over the age of 64 in respect of Income Protection cover).

Likely Objectives, Financial Situation and Needs of Consumers in the Target Market

Shadforth Portfolio Service – Super has been designed for clients whose likely objectives, financial situation and needs are such that they are looking for:

- a comprehensive superannuation solution via a financial adviser that can be tailored for their needs
- access to over 200 managed investments, the majority of listed investments in the S&P/ASX 300 Index plus other listed investments approved by the Trustee from time to time, term deposits, fixed-term annuities and a managed discretionary account service
- the option of group or retail Death and TPD cover or Income Protection insurance cover in super (subject to age, eligibility and underwriting conditions)
- the flexibility to monitor their super as much as they'd like by checking their, contributions, balance and transactions online

- a cap on their administration fees and/or a reduction to their administration fees through fee aggregation
- an account that can move from super to pension.

Please note: Whilst the product is predominantly designed to be used with a Shadforth Financial Group financial adviser, direct retail members are not excluded from continuing to hold an account in Shadforth Portfolio Service – Super.

Key Attributes

Product attributes

The key attributes of Shadforth Portfolio Service - Super are as follows:

- access to approximately 200 managed investments (including the Strategic Funds and Specialist Funds), the majority of listed investments in the S&P/ASX 300 Index plus other listed investments approved by the Trustee from time to time, term deposits and fixed-term annuities
- the ability to move from super to pension without selling down the assets or realising capital gains
- secure online access to account details with simple, fast and effective reporting
- a transparent fee structure, with the ability to reduce fees by linking accounts through fee aggregation
- a range of insurance options within super including Death, TPD and Income Protection cover
- a managed discretionary account service which provides access to professionally managed models that are constructed, monitored and rebalanced in accordance with an investment strategy chosen with the client's financial adviser.

Investment attributes

Clients have a choice of investment options across 17 investment strategies depending on their investment objective, preference for risk and return and investment timeframe. The types of clients for whom the different categories of investment options are intended for are broadly described below.

An individual client, however, should have regard to the information provided in the PDS for this product before making an investment selection. The client may choose to invest in multiple options (with different characteristics) to meet their investment needs. Clients should speak to their financial adviser to determine which best suits their needs (where appropriate).

Investment Attribute Key		
 In target market	 Potentially in target market	 Not considered in target market
Standard risk measure		
1 = Very low	2 = Low	3 = Low to Medium
	4 = Medium	5 = Medium to High
		6 = High
		7 = Very High

Investment Strategy	Usually held for a minimum of:	Investment Objective		Standard Risk Measure*
		Capital Growth	Capital Preservation	
Cash Funds	No minimum			 2-3
Diversified Conservative Funds	Short-Medium Term 2+ Years			 3-5
Alternative Funds ¹	Medium Term 5+ Years			 5-7

Investment Strategy	Usually held for a minimum of:	Investment Objective		Standard Risk Measure*
		Capital Growth	Capital Preservation	
Australian Fixed Interest Funds ²	Medium Term 4+ Years	△	✓	 3-6
Diversified Balanced Funds	Medium Term 5+ Years	✓	✗	 4-6
International Fixed Interest Funds ³	Medium Term 4+ Years	△	✓	 3-6
Exchange-traded funds	Medium to Long Term 3 - 6+ Years	As per underlying pool of investments		
Australian Share Funds ⁴	Long Term 7+ Years	✓	✗	 6-7
Commodities	Long Term 7+ Years	✓	✗	 7
Diversified Growth Funds	Long Term 7+ Years	✓	✗	 5-6
Global Infrastructure Funds	Long Term 7+ Years	✓	✗	 6-7
Global Share Funds ⁵	Long Term 7+ Years	✓	✗	 6-7
Listed Investments - Australian Property Trusts	Long Term 6+ Years	✓	✗	 6
Listed investment companies - Australian Shares	Long Term 6+ Years	✓	✗	 6
Listed High yielding investments	Long Term 6+ Years	△	△	 6
Listed investment companies - International Shares	Long Term 6+ Years	✓	✗	 6
Property Funds ⁶	Long Term 7+ Years	✓	✗	 6-7

* Standard Risk Measure is a guide to the likely number of negative annual returns expected over any 20 year period.

1 Includes hedge funds, private equity, managed futures and multi asset funds.

2 Includes Australian Government, semi Government, corporate, inflation-linked, mortgage securities and high-yielding securities.

3 Includes foreign Government, semi Government, corporate, inflation-linked, mortgage securities and high-yielding securities.

4 Includes large, mid and small caps.

5 Includes large unhedged and large hedged global shares, small caps and regional shares.

6 Includes both Australian and global property exposures.

Insurance attributes

For clients who want the convenience of insurance cover through their super:

- Group Life Policy - provides Death and TPD cover or Income Protection cover
- Retail Insurance - provides Death and TPD cover or Income Protection cover with additional options via select life insurers.

Please note: Any insurance is subject to meeting eligibility and underwriting requirements, including but not limited to:

- TPD cover being requested between age 15 and age 66 inclusive
- Death cover being requested between age 15 and age 74 inclusive
- Income Protection cover being requested between age 15 and age 64 inclusive
- Other conditions that may apply as disclosed in the Insurance Guide available online.

Appropriateness of the target market

This product should be consistent with the likely objectives, financial situation and needs of the class of clients in the target market. This is based on an analysis that the key features and attributes of Shadforth Portfolio Service - Super:

- have previously benefited target market clients in the past and continue to do so; and
- fulfil a need for clients who are looking for a comprehensive superannuation solution that offers an extensive range of investments to help construct a unique portfolio.

The Shadforth Portfolio Service - Super TMD will be reviewed as specified below to ensure it continues to be suitable for clients in the target market.

Distribution Channels

This product can be distributed only via a financial adviser within the Shadforth Financial Group.



Financial Adviser

Distribution Conditions

This product should only be distributed via an application form where the client meets all eligibility criteria.

Appropriateness of distribution conditions

The distribution conditions and restrictions will make it likely that clients who purchase the product are in the class of clients for which the Shadforth Portfolio Service - Super has been designed given the distribution conditions and restrictions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

Review Period and triggers

Review period	Maximum period for review
Effective date	5 October 2021
Next review by	5 January 2023
Periodic review	At least every 3 years and 3 months from the previous review.
Review triggers	
	The following events and circumstances would reasonably suggest the TMD is no longer appropriate: <ul style="list-style-type: none"> • material changes to key product attributes and the terms and conditions of the product • significant number of clients exiting the product

Review triggers

- the issuer determines that the financial interests of the clients are not being promoted as part of its member outcomes assessment
- significant dealing outside the TMD
- material or unexpectedly high number of complaints about the product
- the use of 'product intervention powers', regulator orders or directions that affect the product
- regulatory changes that have a significant impact on the attributes of the product

Distributor Reporting

Significant Dealings Reporting

Distributors are required to notify the issuer if they become aware of a significant dealing in the product that is not consistent with the TMD.

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 client (or class of client).

In each case, the distributor should have regard to:

- the actual or potential harm to a client,
- the nature and extent of the inconsistency of distribution with the TMD (including an explanation of why the dealings occurred outside the target market),
- the date range of when the significant dealing occurred,
- the number of clients impacted by the significant dealing (i.e. the number of clients who are not in the target market (or who have been excluded from the target market) as a proportion of all clients who have acquired the product), and
- the time period in which these acquisitions outside the target market occurred.

The reporting period is as soon as practicable but no later than 10 business days after becoming aware of the significant dealing.

Complaints Reporting

The distributor will provide details of the number and nature of complaints relating to product design, product availability and distribution, having regard to privacy.

The distributor should provide details as soon as practicable but no later than 10 business days following the end of the calendar quarter.

IIML is the Trustee of the IOOF Portfolio Service Superannuation Fund (ABN 70 815 369 818) (Fund) and Shadforth Portfolio Service – Super is part of the Fund. The information in this TMD is of a general nature only and has been prepared without taking into account a client's objectives, financial situation or needs. Before making a decision based on this information, you should consider the appropriateness of the information, having regard to your objectives, financial situation and needs. IIML is part of the IOOF group of companies comprising IOOF Holdings Ltd (ABN 49 100 103 722) and its related bodies corporate ('IOOF Group'). An investment with IIML is subject to investment risk, including possible delays in repayment and loss of income and principal invested. Past performance is not an indication of future performance. The repayment of capital, the performance or any rate of return of an investment with IIML is not guaranteed by any member of the IOOF Group or any other related or associated company.