PEAK INVESTMENT HOLDINGS PTY LTD

Target Market Determination for Managed Discretionary Accounts (MDAs)

Legal disclaimer

This Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). It sets out the class of consumers for whom the product, including its key attributes, would likely be consistent with their likely objectives, financial situation and needs. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of Peak Investment Holdings Pty Ltd's design and distribution arrangements for the product.

This document applies to **retail clients only**. It is not a product disclosure statement and is not a 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 MDA Contract (also known as the MDA Agreement) and the Financial Services Guide before deciding whether to invest through this product.

Important terms used in this TMD are defined in the TMD Definitions which supplement this document. Capitalised terms have the meaning given to them in the MDA Contract, unless otherwise defined. You can request a copy of an MDA Contract by contacting a financial adviser at Peak Investment Partners Pty Ltd on 02 8274 5800.

Peak's Target Market Summary:

- **Individuals, Family Trusts, Self-Managed Superfunds, Not for Profits and Companies**
- **Requiring Personalised Individually Managed Discretionary Portfolios (MDA Service)**
- **To achieve their Investment Goals and Objectives**
- **Taking into consideration Their Personal Risk**

- **By investing into Individual Portfolios containing a balance of Listed Australian and International Equities including Exchange Traded Funds, Fixed and Floating Rate Income Hybrid Securities to reflect the Client's investment mandate**
- **Within a Long-Term Time Horizon**

- **The Key Attribute to clients of this service is that your portfolio is managed by experienced professional portfolio managers who design and manage portfolios according to your personal needs within your specific investment requirements. It will be attractive to those clients who are time poor and value discretion being given to managers who can make investment decisions on their behalf. The Peak MDA service satisfies those clients who want 'Performance with a Trusted Relationship'.**

- **Peak's product is likely to be appropriate for a consumer seeking either Capital Growth, Income Distribution or a Balance of Capital Growth/Income Distribution. It can be used as a stand-alone, core or satellite product. It can be used within a portfolio where the consumer has a medium-term or long-term investment timeframe. It can be tailored to suit a consumer who has a conservative (risk averse), moderate (balanced) or dynamic/aggressive (high risk) investor risk/return profile. The product is appropriate for a consumer who requires relatively infrequent access to capital on an ad-hoc basis.**

Fund and Issuer identifiers

Issuer	**Peak Investment Holdings Pty Ltd**
Issuer ABN	**17118685993**
Issuer AFSL	**AFSL 304008**
Date TMD approved	**1 October 2021**
TMD Version	**TMD Version 2025 04**
TMD Status	**Current**
Reviewed	**15 April 2025**

Description of Target Market

This part is required under section 994B(5)(b) of the Act.

TMD indicator key (RAG – Red/Amber/Green - rating)

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	Potentially in target market	Not considered 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 customer meeting the attribute in column 1 is likely to be in the target market for this product.

Generally, a consumer is unlikely to be in the target market for the product if:

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

Definitions of terms are in the attachment or otherwise in the MDA Contract.

Investment products and diversification

A consumer (or class of consumer) may intend to hold a product or managed account as part of a diversified portfolio (typically with an intended product use of *satellite/small allocation* or *core component*). In such circumstances, the product or managed account 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 conservative portfolio with a satellite/small allocation to growth assets. In this case, it may be likely that a product or managed account with a *High* or *Very High* risk/return profile is consistent with the consumer's objectives for that allocation notwithstanding that the risk/return profile of the consumer as a whole is *Low* or *Medium*. In making this assessment, distributors should consider all features of a product (including its key attributes).

Consumer Attributes **[A description of the likely objectives, financial situation and needs of the class of consumers in the target market]**	**TMD Indicator for product**	**Product description including key attributes** **[A description of the product, including its key attributes, i.e., product terms, features and attributes that affect the TMD]**
Consumer's investment objective	**TMD Indicator for product**	**Product description including key attributes**
Capital Growth	GREEN	The client's bespoke investment objectives are specified in the Investment Program which is included in the MDA contract. A range of investment objectives can be accommodated, and a portfolio constructed to match these objectives. a. A client seeking to invest in a product designed to generate C**apital Growth** would be invested in an MDA portfolio with a **Growth** profile. This would include exposure to growth assets (such as shares or listed property assets). b. A client seeking to invest in a product designed to distribute regular and/or tax-effective I**ncome Distribution** would be invested in an MDA portfolio with an **Income** profile. This would include exposure to income-generating assets (typically, high dividend-yielding equities, fixed income securities and money market instruments). c. A client seeking to invest in a product designed to generate some **Capital Growth as well as** distribute regular and/or tax-effective **Income Distribution** would be invested in an MDA portfolio with a **Balanced** profile. This would include exposure to a mix of growth assets and income-generating assets.
Capital Preservation	RED	
Capital Guaranteed	RED	
Income Distribution	GREEN	
Consumer's intended product use (% of Investable Assets)	**TMD Indicator for product**	**Product description including key attributes**
Solution/Standalone (75-100%)	GREEN	The portfolio, when fully invested, will include a range of stocks across a spectrum of asset classes to provide diversification. It can therefore suit stand-alone, core or satellite product use.
Core Component (25-75%)	GREEN	
Satellite/small allocation (<25%)	GREEN	

Consumer's investment timeframe	**TMD Indicator for product**	**Product description including key attributes**
Short (≤ 2 years)	RED	The client's bespoke timeframe for an MDA contract is specified in the Investment Program. This would usually be either medium or long term. A short-term timeframe
Medium (> 2 years)	GREEN	

Long (> 8 years)	GREEN	would not be suitable as even a carefully planned, weighted and diversified portfolio may experience periods of negative short-term performance.

Consumer's Risk (ability to bear loss) and Return profile	**TMD Indicator for product**	**Product description including key attributes**
Low Risk	RED	The client's bespoke risk/return profile is specified in the Investment Program. A range of risk profiles can be accommodated. These include the following risk/return profiles: a. A **Conservative/Risk Averse investor** has a low to medium appetite for risk. They are a moderately defensive and willing to accept lower returns and growth to ensure some capital preservation and protection in their portfolio. Their portfolio will include a diversified range of defensive assets such as income hybrid securities, fixed interest securities and defensive/growth equities to provide a stable income stream. b. **Moderate Risk/Balanced investor** seeks long-term growth in value and are willing to tolerate some risks and the occasional year of negative returns in order to achieve this. They also require a reasonably stable income stream, but have sufficient capital available to draw down to supplement income needs if required. Their portfolio will include a diversified balance of growth and defensive assets such as income hybrid securities and defensive/growth equities c. A **Dynamic/Aggressive investor** is prepared to accept high risk and volatility and weather negative returns in the interest of pursuing higher long term returns and growth. They have little need for ongoing income from investments and are unlikely to require access capital in the medium term. They are prepared to accept wider fluctuations in capital value. Their portfolio will include predominantly growth equities with medium/high risk opportunities to provide long term wealth accumulation.
Conservative/Risk Averse	GREEN	
Moderate Risk/Balanced	GREEN	
Dynamic/Aggressive	GREEN	
Consumer's need to withdraw money	**TMD Indicator for product**	**Product description including key attributes**
Daily	RED	Funds can be withdrawn either on a one-off arrangement or a standing request. Under ordinary circumstances the issuer is typically able to meet that request within a reasonable period. Redemption fees are not charged. A regular payment schedule can be accommodated (e.g. a regular pension payment). However, frequent ad-hoc withdrawals are not suitable as all payment instructions are manually executed requiring client confirmation and such withdrawals may conflict with portfolio liquidity and investment time-frames.
Weekly	RED	
Monthly	GREEN	
Quarterly	GREEN	
Annually or longer	GREEN	

Consumer's Other requirements	TMD Indicator for product	Product description including key attributes
Individual tax management of investments	AMBER	The Client will have continuous and confidential online access to all relevant reports within Peak Investment Partner's portfolio monitoring service including tax reports, details of assessable income, franking credits and realised capital gains. These can be used by the client and their tax adviser to assess the client's tax position. They may also be used by the portfolio manager in deciding whether to sell specific assets. However, the portfolio managers are not tax financial advisers.
Visibility / transparency of portfolio holdings	GREEN	The Client will have continuous and confidential online access to portfolio valuation reports within Peak Investment Partner's portfolio monitoring service which include the cost and fair market value of portfolio holdings. Australian securities are registered in the name of the Client (except when a nominee company is used). International securities on overseas exchanges are either registered in the Client's name with Pershing LLC (a subsidiary of The Bank of New York Mellon Corporation) or held by the appointed sub-custodians for CMC Markets Stockbroking (BNP, Hong Kong and Shanghai Banking Corp Limited or RBC Investor Services depending on which exchange the securities are held).
Ability to customise portfolio or accommodate other holdings	GREEN	The client can exclude certain sectors of the market or any specific asset class or any individual security from their portfolio by including these instructions in their MDA contract. The portfolio can also accommodate other holdings.
Ability to include *in specie* transfer of existing investments	GREEN	The client's portfolio can incorporate the in-specie transfer of existing holdings where ownership is to carry on, subject to subsequent portfolio management considerations. This may be for tax, transaction cost or other reasons.

Appropriateness

Note: This section is required under RG 274.64–66

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 described below, as the attributes of this product in Column 3 of the table above are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Distribution conditions/restrictions

This part is required under section 994B(5)(c) of the Act.

Distribution Condition	Distribution Condition Rationale
Only suitable for distribution to consumers who have received personal advice	MDA contracts can only be issued to clients who have received personal financial advice. This advice is provided in a Statement of Advice which includes an authority to proceed requiring client signature before the MDA contract can be issued.
Only suitable for distribution through specified distributors.	Distribution is restricted to authorised representatives and employees of Peak Investment Partners Pty Ltd and its related bodies corporate. As MDA contracts are bespoke for each client, and each client is allocated a specific portfolio manager at Peak Investment Partners Pty Ltd to manage their portfolio, broader distribution is not appropriate.

Review triggers This part is required under section 994B(5)(d) of the Act.
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 review periods This part is required under section 994B(5)(e) and (f) of the Act.	
Review period	**Maximum period for review**
Initial review	1 year
Subsequent review	3 years

Distributor reporting requirements This part is required under section 994B(5)(g) and (h) of the Act.		
Reporting requirement	**Reporting period**	**Which distributors this requirement applies to**
Complaints (as defined in section 994A(1) of the Act) relating to the product design, product availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	Within 10 business days following end of calendar quarter	All distributors
Significant dealing outside of target market, under s994F(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
To the extent a distributor is aware, dealings outside the target market, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	Within 10 business days following end of calendar quarter.	All distributors

Distributors must report to Peak Investment Holdings Pty Ltd by email addressed to the Compliance Officer, Stuart Dear, at stuartd@peakinvest.com.au. If a confirmation email is not received this should be followed up with a phone call on 02 8274 5800.

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Definitions

Term	Definition
Consumer's investment objective	
Capital Growth	The consumer seeks to invest in a product designed to generate capital return. 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 to reduce volatility and minimise loss in a market down-turn. The consumer prefers exposure to defensive assets (such as cash or fixed income securities) that are generally lower in risk and less volatile than growth investments.
Capital Guaranteed	The consumer seeks a guarantee or protection against capital loss whilst still seeking the potential for capital growth (typically gained through a derivative arrangement). The consumer would likely understand the complexities, conditions and risks that are associated with such products.
Income Distribution	The consumer seeks to invest in a product designed to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (typically, high dividend-yielding equities, fixed income securities and money market instruments).
Consumer's intended product use (% of Investable Assets)	
Solution/Standalone (75-100%)	The consumer intends to hold the investment as either a part or the majority (up to 100%) of their total *investable assets (*see definition below). The consumer typically prefers exposure to a product with at least High *portfolio diversification* (see definitions below).
Core Component (25-75%)	The consumer intends to hold the investment as a major component, up to 75%, of their total *investable assets* (see definition below). The consumer typically prefers exposure to a product with at least Medium *portfolio diversification* (see definitions below).
Satellite (<25%)	The consumer 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 *investable assets* (see definition below). The consumer is likely to be comfortable with exposure to a product with Low *portfolio diversification* (see definitions below).
Investable Assets	Those assets that the investor has available for investment, excluding the family home.
Portfolio diversification (for completing the key product attribute section of consumer's intended product use)	
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".

Term	Definition
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).
Consumer's intended investment timeframe	
Short (≤ 2 years)	The consumer has a short investment timeframe and may wish to redeem within two years.
Medium (> 2 years)	The consumer has a medium investment timeframe and is unlikely to redeem within two years.
Long (> 8 years)	The consumer has a long investment timeframe and is unlikely to redeem within eight years.
Consumer's Risk (ability to bear loss) and Return profile	
A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.	
Low Risk	The consumer has a definite need for a very secure income. They are risk averse and will not accept much downside risk or fluctuation in capital value. Consumer typically prefers defensive assets such as cash and fixed income.
Conservative/Risk Averse	The consumer is conservative or low risk in nature, seeks to minimise potential losses (e.g. has the ability to bear up to 1 negative return over a 20 year period) and is comfortable with a low target return profile. Consumer typically prefers defensive assets such as cash and fixed income.
Moderate Risk/Balanced	The consumer is moderate or medium risk in nature, seeking to minimise potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period) 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.
Dynamic/Aggressive	The consumer is higher risk in nature and can accept higher potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period) in order to target a higher 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.
Consumer's need to withdraw money	
Issuers should consider in the first instance the redemption request frequency under ordinary circumstances. However, the redemption request frequency is not the only consideration when determining the ability to meet the investor's requirement to access capital. 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 completing this section.	
Daily/Weekly/Monthly/Quarterly/ Annually or longer	The consumer seeks to invest in a product which permits redemption requests at this frequency under ordinary circumstances and the issuer is typically able to meet that request within a reasonable period.
Consumer's Other requirements	

Term	Definition
Individual tax management of investments	The customer is seeking a product that provides the ability to actively manage the consumer's tax position in the recommendations which are made to them
Visibility / transparency of portfolio holdings	The consumer is seeking a product that provides a clear understanding of the constituents in their portfolio.
Ability to customise portfolio or accommodate other holdings	The consumer requires the ability to specifically include, exclude or manage specific investments or classes of investment for particular reasons, such as ESG considerations, or because they have existing holdings which need to be accommodated in portfolio design.
Ability to include *in specie* transfer of existing investments	The consumer has existing holdings which they expect to be incorporated into their portfolio and where ownership is to carry on, subject to subsequent portfolio management considerations. This may be for tax, transaction cost or other reasons.
Distributor Reporting	
Significant dealings	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 (which may be indicated by the number of red or amber ratings attributed to the consumer). Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if: • it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the reporting period,

Term	Definition
	• the consumer's intended product use is *Solution* / *Standalone*, or • the consumer's intended product use is *Core component* and the consumer's risk (ability to bear loss) and return profile is *Low*.