

## Target Market Determination – Funds Management

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 One Management Investment Funds Limited's design and distribution arrangements for the product.

This document 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 Product Disclosure Statement (**PDS**) for Landen Funds ARSN 653 001 015 and the Supplementary Product Disclosure Statement the Specific Investment Fund – Norwest (**SPDS**) before making a decision whether to invest in Landen Funds.

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 PDS and SPDS, unless otherwise defined. The PDS and SPDS can be obtained at <https://landen.com.au/funds/>.

## Target Market Summary

**This product is likely to be appropriate for a consumer seeking to diversify their investment portfolio to include exposure to secured loans with a higher rate of return commensurate with the risk exposure. The Class will be exposed to loans that are secured against the borrower's assets which may eventually include Australian real property. Consumers in the target market have a medium investment timeframe, high risk appetite and limited needs for access to capital. The product intends to pay a regular monthly income.**

## Fund and Issuer identifiers

<b>Issuer</b>	One Managed Investment Funds Limited	<b>Date TMD approved</b>	27 Jun 2022
<b>Issuer ABN</b>	117 400 987	<b>TMD Version</b>	1
<b>Issuer AFSL</b>	297042	<b>TMD Status</b>	Current
<b>Fund and class</b>	<b>Landen Funds - Norwest Class of Units</b>		
<b>ARSN</b>	653 001 015		

## 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	Potentially in target market	Not considered 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.

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.

### Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (typically with an intended product use of *satellite/small allocation* or *core component*). 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 conservative portfolio with a satellite/small allocation to growth assets. In this case, it may be likely that a product 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	TMD Indicator	Product description including key attributes
<b>Consumer's investment objective</b>		
Capital Growth	Not considered in target market	The Norwest Class of Units invests in a Specific Investment Fund which will advance secured loans (second ranking) for a fixed term to a borrower related to the Investment Manager. The borrower will provide security for the loan expected to be sufficient to preserve investors capital, however there is a risk that in the event of a borrower default, the amount realised on the enforcement of the security will be insufficient to return all of investors' capital or may take longer than anticipated to do so. Distributions are expected to be paid regularly (monthly). An investment in the Norwest Class of Units is not capital guaranteed.
Capital Preservation	In target market	
Capital Guaranteed	Not considered in target market	
Income Distribution	In target market.	

Consumer Attributes	TMD Indicator	Product description including key attributes
<b>Consumer's intended product use (% of Investable Assets)</b>		
Solution/Standalone (75-100%)	Not considered in target market	The Norwest Class of Units invests in one Specific Investment Fund that intends to make a loan to one borrower developing (via subdivision) one Australian property. We consider an investment in the Norwest Class of Units is most likely suitable for investors seeking a satellite/small (<25%) allocation.  Although the Fund originally had a single asset class, it is now offering different classes of units which are investing in separate Specific Investment Funds with exposure to different types of loans and security. Each Specific Investment Fund is referable to one class of units and is not considered a diversified investment. Investors can, however, diversify their secured loan investment allocation by selecting exposure to a number of different types of loans available through different classes of units on offer by the Fund and accordingly investment in the Fund as a whole may be suitable for certain investors allocating a core component, up to 50%, of their investible assets.
Core Component (25-75%)	Not considered in target market	
Satellite/small allocation (<25%)	In target market	
<b>Consumer's investment timeframe</b>		
Short (≤ 2 years)	In target market.	The Norwest Class of Units invests in one Specific Investment Fund that will make a fixed term loan of less than 2 years to the Borrower. The loan may be extended in certain limited circumstances. If there is a default, the loan will not be repaid until the security is enforced and the assets realised. An investment in the Norwest Class of Units is illiquid and no liquidity event will be available to an investor before the expiry of the loan or enforcement of the security (if applicable).
Medium (> 2 years)	Potentially in target market.	
Long (> 5 years)	Not considered in target market	
<b>Consumer's Risk (ability to bear loss) and Return profile</b>		
Low	Not considered in target market	The Norwest Class of Units invests in one Specific Investment Fund that will make a loan to a borrower where initially the security will be the borrower's corporate assets and the director's guarantee until it can acquire title to the development land. The loan to value ratio will be 80% of the as if complete value of the land. There is a risk of a default by the borrower and if the proceeds realised from the security is insufficient at the time it is enforced, there is a risk that investors will suffer a loss.
Medium	Not considered in target market	
High	Potentially in target market.	
Very High	In target market	

Consumer Attributes	TMD Indicator	Product description including key attributes
<b>Consumer's need to withdraw money</b>		
Daily	Not considered in target market	The Norwest Class of Units invests in one Specific Investment Fund that will make made a fixed term loan of less than 2 years to the Borrower. The loan may be extended in certain limited circumstances. If there is a default, the loan will not be repaid until the security is enforced and the assets realised. An investment in the Norwest Class of Units is illiquid and no liquidity event will be available to an investor before the expiry of the loan or enforcement of the security (if applicable).  We also note that whilst investors can transfer their units, however there is no readily available secondary market to facilitate the sale of units.
Weekly	Not considered in target market	
Monthly	Not considered in target market	
Quarterly	Not considered in target market	
Annually or longer	In target market	

### 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 described above, as the features 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
There are no distribution conditions for investors who have received personal financial product advice or are wholesale clients.	Not applicable.
The application form for the Norwest Class of Units will include filtering questions	It is not expected that an investment in the Norwest Class of Units will cause any significant harm to investors but filtering questions will assist in monitoring this.

<b>Review triggers</b>
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.

<b>Mandatory review periods</b>	
This part is required under section 994B(5)(e) and (f) of the Act.	
<b>Review period</b>	<b>Maximum period for review</b>
Initial review	1 year
Subsequent review	1 year and 6 months

<b>Distributor reporting requirements</b>		
This part is required under section 994B(5)(g) and (h) of the Act.		
<b>Reporting requirement</b>	<b>Reporting period</b>	<b>Which distributors this requirement applies to</b>
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
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Contact details relating to this TMD can be found at <https://landen.com.au/funds/>.

## Definitions

Term	Definition
<b>Consumer's investment objective</b>	
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).
<b>Consumer's intended product use (% of Investable Assets)</b>	
Solution/Standalone (75-100%)	The consumer 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 consumer typically prefers exposure to a product with at least High <i>portfolio diversification</i> (see definitions below).
Core Component (25-75%)	The consumer intends to hold the investment as a major component, up to 75%, of their total <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least Medium <i>portfolio diversification</i> (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 <i>investable assets</i> (see definition below). The consumer is likely to be comfortable with exposure to a product with Low <i>portfolio diversification</i> (see definitions below).

<b>Term</b>	<b>Definition</b>
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.
<b>Portfolio diversification (for completing the key product attribute section of consumer's intended product use)</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>Consumer's intended investment timeframe</b>	
Short ( $\leq 2$ 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 ( $> 5$ years)	The consumer has a long investment timeframe and is unlikely to redeem within five years.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>	
A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.	
Low	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 (SRM 1 to 2)) and is comfortable with a low target return profile. Consumer typically prefers defensive assets such as cash and fixed income.
Medium	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 (SRM 3 to 5)) 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.
High	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 (SRM 6)) 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.
Very high	The consumer has a more aggressive or very high risk appetite, seeks to maximise returns and can accept higher potential losses (e.g. has the ability to bear 6 or more negative returns over a 20 year period (SRM 7) and possibly other risk factors, such as leverage). Consumer typically prefers growth assets such as shares, property and alternative assets.

Term	Definition
<b>Consumer's need to withdraw money</b>	
<p>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.</p>	
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.
<b>Distributor Reporting</b>	
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.</p> <p>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"> <li>• they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or</li> <li>• 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).</li> </ul> <p>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> <li>• the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes),</li> <li>• 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</li> <li>• 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).</li> </ul> <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"> <li>• it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the reporting period,</li> <li>• the consumer's intended product use is <i>Solution / Standalone</i>, or</li> <li>• the consumer's intended product use is <i>Core component</i> and the consumer's risk (ability to bear loss) and return profile is <i>Low</i>.</li> </ul>



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