

Issue Date: 18 October 2023

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**Act**). It describes the class of consumers that comprises the target market for the Fund Product and matters relevant to the Fund Product’s distribution and review (specifically, distribution conditions, triggers to review the target market and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the Fund Product being consistent with the most recent TMD (unless the distribution is excluded conduct). It forms part of the Issuer’s design and distribution arrangements for the Fund Product.

This document is not a product disclosure statement, and is not a summary of the product features or terms of the Fund Product. This document does not take into account any person’s individual objectives, financial situation or needs. Consumers interested in acquiring this Fund Product should carefully read the Product Disclosure Statement (**PDS**) for the La Trobe Australian Credit Fund (**Fund**) before deciding whether to buy this Fund Product.

1. Product and Issuer Description

Fund Product	La Trobe Australian Credit Fund – 4 Year Account
Issuer	La Trobe Financial Asset Management Limited AFSL 222213, ABN 27 007 332 363
Fund Manager	La Trobe Financial Services Pty Limited ABN 30 006 479 527
Fund ARSN	088 178 321
APIR Code	MFL0001AU
TMD Version	3.0

2. Description of target market for the Fund Product

The Consumer Attributes column in the table below indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering this Fund Product.

Category	Consumer Attributes
Consumer’s Investment Objective	<p>The consumer seeks an investment which offers the following choices:</p> <ul style="list-style-type: none"> monthly interest income based on a variable rate of return (determined monthly); interest income paid monthly to the consumer or reinvested at their direction; low volatility of returns; an illiquidity premium, that is, a higher variable rate of return in exchange for less liquidity, as compared to other products within the Fund; and access to a diversified portfolio of investments in loans secured by first mortgages, in addition to credit assets structured as medium-term notes within Australia together with investment exposure to medium term mezzanine credit assets, credit instruments including corporate debt, and loans secured by Australian residential and commercial real property.
Consumer Risk (ability to bear loss) and Return Profile	<p>The consumer:</p> <ul style="list-style-type: none"> can accept no guarantee of the investment result, the return of capital, interest payments to consumers or liquidity; can accept variable rates of return which may be less than the rate of return disclosed on the Issuer’s website; can accept returns that depend on the performance of the underlying credit assets, loan portfolio and investments; is willing to accept the risk that the consumer may lose some or all of their invested capital; and is willing to accept the risk that the consumer may not be able to access their capital at maturity of their 4 year investment.
Consumer Financial Situation	<ul style="list-style-type: none"> The consumer has sufficient funds to invest the minimum investment amount of \$250,000 consistent with the consumer’s intended product use (see below).
Consumer’s Investment Timeframe	<ul style="list-style-type: none"> The consumer has a minimum investment timeframe of at least 4 years from the date of receipt by the Issuer of the consumer’s investment.

Consumer's Need to Access Capital	<p>The consumer accepts that access to their capital is possible after a minimum investment period of 4 years in normal operating conditions, and in other conditions, the Issuer may suspend withdrawals where the Issuer is reasonably of the view that it is necessary to do so in order for it to comply with its obligations under the Law. Notice requirements apply for withdrawal at maturity (refer to the PDS).</p> <p>The Fund Product does not provide the consumer with the right of early withdrawal of some or all of their funds invested in the Fund Product. However, the Issuer may consider a written request for an early withdrawal where the consumer is facing exceptional circumstances and requires access to funds but only where the withdrawal occurs or is to occur while the Fund is liquid as defined under the Law.</p>										
Consumer's Intended Product Use (% of Investable Assets¹)	<table border="1" data-bbox="456 432 1209 629"> <tr> <td>Solution/Standalone (up to 100%)</td> <td>Not in target market</td> </tr> <tr> <td>Major allocation (up to 75%)</td> <td>Not in target market</td> </tr> <tr> <td>Core component (up to 50%)</td> <td>In target market</td> </tr> <tr> <td>Minor allocation (up to 25%)</td> <td>In target market</td> </tr> <tr> <td>Satellite/Small Allocation (up to 10%)</td> <td>In target market</td> </tr> </table> <p>Solution/Standalone</p> <p>The consumer may hold the investment as up to 100% of their total investable assets¹. The consumer is likely to seek a product with very high portfolio diversification².</p> <p>Major allocation</p> <p>The consumer may hold the investment as up to 75% of their total investable assets¹. The consumer is likely to seek a product with at least high portfolio diversification².</p> <p>Core Component</p> <p>The consumer may hold the investment as up to 50%, of their total investable assets¹. The consumer is likely to seek a product with at least medium portfolio diversification².</p> <p>Minor allocation</p> <p>The consumer may hold the investment as up to 25%, of their total investable assets¹. The consumer is likely to seek a product with at least low portfolio diversification².</p> <p>Satellite/Small allocation</p> <p>The consumer may hold the investment as up to 10% of their total investable assets¹. The consumer may seek a product with very low portfolio diversification². Products classified as extremely high risk are likely to meet this category only.</p>	Solution/Standalone (up to 100%)	Not in target market	Major allocation (up to 75%)	Not in target market	Core component (up to 50%)	In target market	Minor allocation (up to 25%)	In target market	Satellite/Small Allocation (up to 10%)	In target market
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Minor allocation (up to 25%)	In target market										
Satellite/Small Allocation (up to 10%)	In target market										
Consumers for whom the Fund Product may be unsuitable	<p>This Fund Product may not be suitable for consumers who:</p> <ul style="list-style-type: none"> • have an intended product use indicated as 'Not in target market' above; • are seeking a capital guaranteed investment or who do not have the ability to bear any loss; • require a fixed rate of return on their investment; • want to invest in a bank deposit or a term deposit with a bank or benefit from Australian Government's deposit guarantee scheme (the Financial Claims Scheme); or • are seeking a highly liquid investment or access to their capital upon request. 										

Investable Assets

1. Investable Assets means those assets that the consumer has available for investment, excluding the residential home.

Portfolio diversification

2. **Very High:** The product provides exposure to a large number of holdings across a broad range of asset classes, sectors and geographic markets with limited correlation to each other.

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).

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).

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).

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).

3. Consistency of Fund Product's features with consumer attributes of Target Market

The Issuer has assessed the Fund Product and formed the view that the Fund Product, including its key attributes summarised below, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market, as the features of this Fund Product, including its key attributes, summarised below are likely to be suitable for consumers with the attributes summarised in Section 2 above.

Category	Product Description including key attributes
Consumer's Investment Objective	<p>The Fund Product:</p> <ul style="list-style-type: none"> • aims to pay monthly interest income based on a variable rate of return (determined monthly); • typically pays a higher variable rate of return as compared to other products within the Fund; • provides consumers with a choice of how interest income can be received, either: <ul style="list-style-type: none"> • directly credited to a bank account nominated by the consumer generally within 14 days after the end of each month; or • reinvestment of interest into the Classic Notice Account, 90 Day Notice Account, 6 Month Notice Account, the 12 Month Term Account or 2 Year Account (provided the consumer has an existing investment in the 12 Month Term Account or 2 Year Account); • is invested in medium term mezzanine credit assets, credit instruments including corporate debt and loans secured by Australian residential and commercial real property and includes: <ul style="list-style-type: none"> • Australian residential mortgage backed assets (RMBA) - an investment secured by Australian residential mortgages including residential mortgage backed securities (RMBS), residential mortgage backed loans (RMBL) and direct mortgages. RMBS and RMBL are secured against a pool of residential mortgages supported by a number of tranches of investments with different risk/ return characteristics.; and • Australian commercial mortgage backed assets (CMBA) - an investment secured by commercial mortgages and includes commercial mortgage backed securities (CMBS), commercial mortgage backed loans (CMBL) and direct mortgages. CMBS and CMBL are secured against a pool of commercial mortgages supported by a number of tranches of investments with different risk/ return characteristics.
Consumer's Risk (ability to bear loss) and Return Profile	<p>The Issuer considers that the portfolio holdings of medium-term mezzanine credit assets, credit instruments including corporate debt and loans secured by Australian residential and commercial real property is supportive of ongoing, monthly income characterised by low volatility of returns.</p> <p>The Issuer considers the Fund Product:</p> <ul style="list-style-type: none"> • has an indicative risk level (refer to the PDS) of Medium³ (that is, over any 20 year period, the Issuer considers that the Fund Product is likely to experience between 2 and less than 3 years of negative annual returns); • does not guarantee any investment result, the return of capital, interest payments to consumers or liquidity; • may provide variable rates of return which may be less than the rate of return disclosed on the Issuer's website; • has a return profile that depends on the performance of the underlying investments; • is subject to the risk of delays in the return of the funds invested as investments include mezzanine credit assets of various kinds; • has exposure through its RMBA and CMBA investments to structured credit risk. Where a borrower has committed an event of a default, the Fund Product's investments will rank behind senior credit providers (but ahead of more junior credit providers) and this could reduce the Fund Product's interest and/or capital return; • has medium portfolio diversification (see Section 2 above); and • may lead consumers to lose some of their invested capital.
Consumer's Financial Situation	<p>The Fund Product has a minimum investment amount of \$250,000.</p>
Consumer's Investment Timeframe	<p>The Fund Product has a minimum investment period of 4 years and the investment matures 4 years from the date of receipt by the Issuer of the application monies (Maturity Date).</p> <p>The Issuer will make every endeavour to release investor funds where a written request is received at least 3 months prior to the Maturity Date. The Issuer may suspend withdrawals where the Issuer is reasonably of the view that it is necessary to do so in order for it to comply with its obligations under the Law.</p>

Consumer's need to access capital	<p>The Fund Product does not provide the consumer with the right of early withdrawal of some or all of their funds invested in the Fund Product.</p> <p>The Issuer may, at its discretion, consider an early withdrawal request from a consumer facing exceptional circumstances to withdraw part or whole of their investment prior to maturity but only where the Fund is liquid.</p>
Consumer's Intended Product Use	The Issuer considers that the Fund Product has medium diversification (see Section 2 above). The consumer may hold the investment as up to 50% of their total investable assets.
Consumers for whom the Fund Product may be unsuitable	<p>This Fund Product:</p> <ul style="list-style-type: none"> • does not guarantee any investment result, the return of capital, interest payments to consumers or liquidity; • pays a variable rate of return; • is not a bank deposit or a term deposit, and is not covered by the Australian Government's deposit guarantee scheme (the Financial Claims Scheme); and • has a minimum investment period of 4 years.

3. The Joint ASFA/FSC Guidance Paper on Standard Risk Measures provides a seven-level classification system intended to provide granularity to investors. The Standard Risk Measure is not a complete assessment of risk and potential loss. For example, it does not detail important issues such as the potential size of a negative return (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors.

4. Distribution conditions/restrictions

Distributors this condition applies to	Distribution Conditions	Distribution condition rationale
Issuer – Direct to Consumer	The Issuer's distribution and sales staff and Authorised Representatives of the Issuer are required to be properly trained in DDO and undergo at least annual training.	This distribution condition will make it more likely that the Issuer's sales or distribution staff or Authorised Representatives will identify if a consumer is not within the target market.
Issuer – Marketing	<p>No Fund Product marketing, advertising or promotional materials may be sent or made available by the Issuer unless the Issuer has completed an external communications compliance checklist.</p> <p>Advertising of this Fund Product to retail investors will include a recommendation that the consumer may wish to obtain personal advice.</p>	The Issuer has assessed that these distribution conditions are likely to result in distribution to consumers who are likely to be in the target market because distributors using this promotional material will not be promoting the Fund Product in a way that could misrepresent the Fund Product or likely direct marketing to potential consumers outside the target market.

<p>Third-Party Distribution (including Investment Platforms)</p>	<p>Legal Obligations</p> <p>All third-party distributors must meet all ongoing regulatory and disclosure obligations relating to their position in the market.</p> <p>Financial advisers are also required to hold an Australian Financial Services License or maintain an appointment as a representative authorised to engage in activities on behalf of a financial services licensee as part of the Issuer’s accreditation requirements.</p> <p>Marketing, Advertising & Promotion</p> <p>Third-party distributors may not use marketing, advertising or promotional materials that are inconsistent with the Issuer’s issued materials.</p> <p>Distribution Agreement</p> <p>Where a third-party distributor has entered into a distribution agreement with the Issuer, each third-party distributor must meet on an ongoing basis the Issuer’s accreditation requirements and referrers and authorised representatives must comply with their respective distribution agreement with the Issuer.</p>	<p>Legal Obligations</p> <p>In relation to Investment Platforms and financial advisers, the Issuer has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because:</p> <ul style="list-style-type: none"> • The issuer of each platform or approved product has its own obligations as a distributor to take reasonable steps that will or are reasonably likely to result in retail product distribution conduct being consistent with this TMD; • The Issuer has an arrangement with each platform provider governing their relationship noting that platform providers, as distributors, are required to take reasonable steps that will, or are likely to, result in distribution of the Fund Product being consistent with its TMD; and • Where investments are placed under advice, the standard advice documentation process (ie the provision of advice to the consumer) will be followed. <p>Marketing, Advertising & Promotion</p> <p>The Issuer has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because distributors using promotional material will not be promoting the Fund Product in a way that could misrepresent the Fund Product or likely direct marketing to potential consumers outside the target market.</p> <p>Distribution Agreement</p> <p>The Issuer has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because requiring distributors to comply with relevant conditions of distribution aims to reinforce to the distributor that the Issuer is committed to its compliance with the DDO regime.</p>
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5. Reviewing this TMD

This TMD will be reviewed on:

- a scheduled basis with reviews to be completed before the end of the maximum period for review specified below; and
- where a Review Trigger (as defined below) has occurred.

Mandatory TMD review periods

Reporting requirements	Maximum period for review
Initial review	Not applicable
Subsequent Review	18 January 2025, being 1 year and 3 months from the date of the previous TMD review.

Note: The review period allows for the collection of data for 12 months, plus three months for the completion of the review.

Review Triggers

The events and circumstances described below (**Review Triggers**) will also require a review of this TMD:

- material change to the terms or attributes of the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- where and when the Fund Product is not being distributed and purchased as envisaged by this TMD which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- an event or circumstance that would materially change a factor considered in making the TMD for the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;

- reporting from distributors of one or more 'significant dealings', multiple distributors of 'significant dealing' (see section 6 below) in the Fund Product or numerous reports from one distributor of 'significant dealings' in the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- determination by the Issuer of a 'significant dealing' (see section 6 below) in the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the Fund Product or the distribution of the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- a reportable situation (as defined in section 912D of the Act) has been reported in relation to the design or distribution of the Fund Product and which the Issuer reasonably considers indicates that the TMD may no longer be appropriate;
- regulatory inquiry by AFCA, ASIC or another regulatory authority as to the design or distribution of the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate; and/or
- the use by ASIC or other regulators of Product Intervention Powers, regulatory orders or directions that affect the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate.

The above Review Triggers do not limit the Issuer's obligations under Section 994C(3)(ii) of the Act. When a review trigger has occurred, this TMD will be reviewed within 10 business days.

6. Reporting and monitoring this TMD

The following reporting requirements apply to all distributors of the Fund Product:

Reporting requirements	Reporting period
Where the distributor is aware or ought to reasonably be aware, it should report on each 'significant dealing' outside of the target market, under section 994F(6) of the Act (see guidance below) by completing the Notification of Significant Dealing Form and submitting it to: targetmarketdistribution@latrobefinancial.com.au .	As soon as practicable but no later than 10 business days after the distributor becomes aware of the 'significant dealing'.
Distributors must report to the Issuer (at targetmarketdistribution@latrobefinancial.com.au): <ul style="list-style-type: none"> • if required by law, whether the distributor received complaints in relation to the Fund Product during the reporting period; • the number of complaints it received; and • include, with its report, a copy of each complaint (as defined in section 994A(1) of the Act) (to the extent permitted under privacy and other laws), or where this is not possible, report on the content of each complaint. 	On a quarterly basis and for each quarter as soon as practicable but no later than 10 business days following the end of the quarter.

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 Fund 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 Fund 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 determining whether a 'significant dealing' has occurred, La Trobe Financial expects that the following non-exhaustive list of factors may be relevant for distributors:

- the nature and risk profile of the Fund Product;
- whether a consumer outside of the target market has acquired the Fund Product; and/or
- the extent to which the acquisition of the Fund Product by the consumer outside of the target market has the potential to harm or has caused harm (including the amount of any financial loss); and/or
- the nature and extent to which the distribution of the Fund Product is inconsistent with the TMD.

The above list is not exhaustive and distributors should consider, having regard to the circumstances of their business, whether other factors or events may suggest that a significant dealing has occurred. A significant dealing may be identified through the distributor's product governance arrangements, as a result of a consumer complaint or the occurrence of a Review Trigger.

7. Contact Us

Please contact the Issuer at targetmarketdistribution@latrobefinancial.com.au with any questions or feedback with respect to this TMD.

Historical versions of this TMD and the Notice of Significant Dealing Form are available at <https://latrobefinancial.com.au/investments/investment-solutions/tmd/>.

8. Disclaimer

Issued by La Trobe Financial Asset Management Limited (AFSL 222213, ABN 27 007 332 363) (**Issuer**). The Issuer is the responsible entity and issuer of the Fund Product referred to in this TMD. This TMD provides general information only and does not take into account your individual objectives, financial situation, needs or circumstances. Before making any investment decision, you should assess whether the TMD is appropriate for you and obtain financial advice tailored to you having regard to your individual objectives, financial situation, needs and circumstances. This TMD is not a financial product recommendation or an offer or solicitation with respect to the purchase or sale of any financial product in any jurisdiction.