

Target Market Determination – Managed Accounts – MDA

Lonsec Listed Managed Portfolio – High Growth

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 Implemented Portfolios Pty 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, MDA Contract or other offer document for Implemented Portfolios Pty Limited's MDA Service before making a decision 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 product's PDS/MDA Contract, unless otherwise defined. The PDS/MDA Contract can be obtained by contacting Implemented Portfolios Pty Limited.

Target Market Summary

This product is likely to be appropriate for a consumer primarily seeking capital growth to be used as a standalone, core or satellite component within a portfolio where the consumer has a long term investment timeframe, a high growth risk/return profile and needs limited short-term access to capital.

Fund and Issuer identifiers

Issuer	Implemented Portfolios Pty Limited
Issuer ABN	36 141 881 147
Issuer AFSL	345143
Model	Lonsec Listed Managed Portfolio - High Growth

APIR Code	n/a
Date TMD approved	17 th March 2023
TMD Version	1.0
TMD Status	Current
TMD end date	N/a

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 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 PDS/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 Lonsec Listed Managed Portfolio - High Growth seeks to maximise long term capital growth opportunities. The portfolio will include limited exposure to cash and income producing securities, with the majority of exposures focused on property and equities, both Australian and International. In general, this product could suit an investor who is less concerned about potential of capital loss and has an investment time horizon to recoup capital. They have sufficient income already and are looking for a capital gain over the long term, and understands that the value of the account could fluctuate significantly over the period that it is held.
Capital Preservation	Red	
Capital Guaranteed	Red	
Income Distribution	Amber	
Consumer's intended product use (% of Investable Assets)	TMD Indicator for product	Product description including key attributes
Solution/Standalone (75-100%)	Green	The product is considered diversified covering multiple asset classes, country exposures and asset issuers. The product seeks exposure to Australian Equities, International Equities, Property and Infrastructure, Income Securities and Cash through access to both domestic and internationally listed securities.
Core Component (25-75%)	Green	
Satellite/small allocation (<25%)	Green	
Consumer's investment timeframe	TMD Indicator for product	Product description including key attributes
Short (\leq 2 years)	Red	

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]
Medium (> 2 years)	Amber	Lonsec takes an active approach to investing and seeks to add value by investing in a concentrated portfolio of quality securities trading at a reasonable price. Lonsec also has a strong focus on risk management and low turnover. The Lonsec Listed Managed Portfolio - High Growth aims to deliver strong returns above benchmark, over the medium to long term by investing predominantly in growth assets, which may include Australian and global equities, property and infrastructure, fixed interest and income securities, alternative assets and cash.
Long (> 8 years)	Green	
Consumer's Risk (ability to bear loss) and Return profile	TMD Indicator for product	Product description including key attributes
Low	Red	The product is high-risk in nature, for investors who are unconcerned about the potential of capital loss and has time to recoup capital. They have sufficient income already and are looking for a capital gain over the long term. This product has a probability of a negative 12-month return of 12.5%.
Medium	Amber	
High	Green	
Very High	Green	
Consumer's need to withdraw money	TMD Indicator for product	Product description including key attributes
Daily	Green	The product permits withdrawal requests daily as facilitated by the relevant account administrator. These are actioned within a reasonable timeframe and can generally be paid out with a number of days given the predominate use of listed and liquid assets with the model.
Weekly	Green	
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*	Green	Via their External Financial Adviser the product allows the consumer the ability to instruct on the management of their individual tax position.
Visibility / transparency of portfolio holdings	Green	The product allows consumers full transparency and clear understanding of the assets held within the portfolio.
Ability to customise portfolio or accommodate other holdings*	Green	Via their External Financial Adviser the product allows the consumer the ability to instruct on specific inclusions or exclusions to their portfolio including individual assets and asset classes, or to manage individual preferences such as ESG considerations.
Ability to include <i>in specie</i> transfer of existing investments	Green	The product permits consumers to in specie transfer existing investments, subject to requirements of the relevant administrator and custody provider, and to provide an instruction via their External Financial Adviser on how the assets are to be treated; for example by incorporating them into the portfolio over time, correlated with a model holding or reserved from trading.

* Not available for the product accessed by consumers through the Panorama platform or Centuria structure given functionality restrictions

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 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

Distribution Condition	Distribution Condition Rationale	Applicable
Only suitable for distribution to consumers who have received personal advice	The product is only made available to those consumers who have received personal advice from	☒

	an External Financial Adviser with whom Implemented Portfolios has a current Distribution Agreement.	
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Review triggers: Any one or more of the following events and circumstances will trigger a review of this TMD
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	
Review period	Maximum period for review
Initial review	1 year, 3 months
Subsequent review	3 years

Distributor reporting requirements		
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

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
Significant dealing outside of target market, under s994F(6) of the Act. <i>See Definitions for further detail.</i>	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	All distributors

Distributors must report to Implemented Portfolios Pty Limited using the method specified on this website: www.implementedportfolios.com.au/TMD. This website also provides contact details relating to this TMD for Implemented Portfolios Pty Limited.

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