



Target Market Determination

Arminius Capital GMMA Fund (ARSN 614 078 812)

Company:	Quay Fund Services Limited
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SECTION A – ABOUT THIS TARGET MARKET DETERMINATION

1. INTRODUCTION

- 1.1 Quay Fund Services Limited (“**Quay**”, “**we**”, “**us**” or “**our**”) operates a registered managed investment scheme. Quay is an issuer and distributor of registered managed investment schemes to retail clients. Accordingly, we must comply with the Design and Distribution Obligations set out in:
- (a) Part 7.8A of the *Corporations Act 2001*;
 - (b) *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019*; and
 - (c) *Corporations Amendment (Design and Distribution Obligations) Regulations 2019*.
- 1.2 This Target Market Determination is issued by Quay and covers Quay’s offering of Arminius Capital GMMA Fund to retail clients.
- 1.3 Quay holds an Australian Financial Services Licence (Number: 494 886). Quay is the Responsible Entity and an issuer of interests in registered managed investment schemes.
- 1.4 The purpose of this Target Market Determination is to ensure Quay’s financial products are suitable for the retail clients Quay targets.
- 1.5 Quay is committed to creating and maintaining a client-centric approach to the design and distribution of its financial products.
- 1.6 This Target Market Determination does not contain all the information that a retail client may require prior to making a decision to acquire or continue to hold a financial product. This document does not provide financial product advice and does not contain a full summary of the financial product’s features, applicable fees, benefits or risks. You should refer to the relevant Product Disclosure Statement (“**PDS**”) before deciding whether to acquire or continue to hold a financial product. The PDS is available at the following link: www.quayfund.com.au.
- 1.7 You should also review the other documents relating to registered managed investment schemes, including the:
- Financial Services Guides; and
 - Continuous Disclosure Notices (if any);
- also available at www.quayfund.com.au.
- 1.8 This Target Market Determination does not apply to wholesale clients as defined by section 761G of the *Corporations Act 2001*.

SECTION B –TARGET MARKET

2. PRODUCT DESCRIPTION AND KEY ATTRIBUTES

2.1 The PDS for Arminius Capital GMMA Fund contains detailed information on the key features, key benefits and key risks of the registered managed investment scheme. It is the responsibility of a retail client to review not only this Target Market Determination but also the PDS and other documents listed in section 1.7 prior to investing in Arminius Capital GMMA Fund.

Key Attributes of the Scheme	Class of retail client
Eligibility Requirements	<ul style="list-style-type: none"> • resident/citizen of Australia; • accept the offer in Australia; • above the age of 18; • have read and accepted the PDS;
Highly complex	<p>Knowledge and Experience: Only clients who have the requisite knowledge and experience to invest in managed investment schemes, as assessed by Quay or by the Fund's investment manager – Arminius Capital Management Pty Ltd.</p> <p>Quay or Arminius Capital Investment Management undertakes assessment of the retail client's experience and knowledge of investing in managed investment schemes prior to approving and distributing the products to the client.</p> <p>Due to the complexity of the Fund, Quay expects the majority of clients will be advised by financial planners.</p>
Medium levels of risk exposure	<p>Ability to bear loss: Clients who:</p> <ul style="list-style-type: none"> • are prepared to lose amounts that can be as great as the sum of their total investment. • accept investment risks and risks associated with investment and losses associated with political instability, war, suspension of financial markets and catastrophic events. <p>Tolerance to risk: Arminius Capital GMMA Fund exposures clients to a Global Macro investment strategy and is suitable for clients with medium investment risk tolerance.</p> <p>Please note that there are particular risks associated with investing in managed</p>

	investment schemes. Please refer to the PDS for further information in relation to the risks of investing in Arminius Capital GMMA Fund.
Liquidity considerations	Redemptions from Arminius Capital GMMA Fund may take up to eight weeks to process and therefore retail clients must be able to accept this liquidity constraint when balanced against their other requirements.

3. OBJECTIVES, FINANCIAL SITUATION AND NEEDS

3.1 Arminius Capital GMMA Fund has been designed for retail clients whose likely objectives, financial situation and needs (as outlined in this document) align with the Scheme (including its key attributes), including retail clients who:

- (a) are clients of a financial adviser or can demonstrate an appropriate level of financial literacy;
- (b) have a minimum 3 year term investment horizon;
- (c) are looking for an investment manager to invest their funds via a managed investment scheme, as opposed to investing directly in underlying assets;
- (d) are looking for an absolute return investment strategy utilising a market neutral investment style;
- (e) seek positive investment returns with lower volatility and lower risk compared to a concentrated single market/asset class exposure;
- (f) are looking for the portfolio construction benefits from exposure to global macro investment strategies;
- (g) have medium risk appetites;
- (h) can accept valuation risk associated with unhedged foreign exchange policy; and
- (i) can accept loss of their investment without suffering financial hardship.

4. RETAIL CLIENTS FOR WHOM ARMINIUS CAPITAL GMMA FUND IS NOT SUITABLE

4.1 Arminius Capital GMMA Fund is not suitable for clients who:

- (a) do not meet the eligibility requirements;
- (b) are seeking capital protection or stability;
- (c) have a short term investment horizons
- (d) are seeking regular or otherwise predictable returns on their investments;
- (e) are not clients of financial advisors or have low levels of financial literacy;

- (f) have a low tolerance to risk;
- (g) do not have the ability and willingness to lose some or all of their investment;
- (h) are vulnerable, including those who are:
 - (i) elderly or suffering an age-related impairment;
 - (ii) suffering any form of cognitive impairment;
 - (iii) suffering from elder or financial abuse;
 - (iv) unemployed or who have recently experienced job loss;
 - (v) suffering from mental or other forms of serious illness affecting capacity;
 - (vi) suffering from any form of addiction; or
 - (vii) suffering from any other personal or financial circumstances causing significant detriment.

5. CONSISTENCY BETWEEN THE TARGET MARKET AND FINANCIAL PRODUCT

5.1 Quay has assessed the Arminius Capital GMMA Fund and formed the view that the Scheme, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of retail clients in the target market, as described above.

SECTION C – DISTRIBUTION

6. DISTRIBUTION CHANNELS

6.1 The Arminius Capital GMMA Fund is distributed by:

- (a) Quay's website, including online and physical application forms in accordance with this document;
- (b) the Fund's investment manager – Arminius Capital Management Pty Ltd including their website;
- (c) financial advisers; and
- (d) through investment platforms.

7. DISTRIBUTION CONDITIONS

7.1 Quay takes reasonable steps to ensure that Quay as well as any distributors, distribute the Arminius Capital GMMA Fund to the Target Market.

7.2 Quay has implemented the following processes to ensure distribution is consistent with retail clients who fall within the Target Market:

- (a) verification of a potential retail client including whether they:
 - (i) fall within the Target Market during the onboarding process,

- (ii) meet all eligibility requirements;

this occurs before accepting them as a client and allowing them to invest.

- (b) distributors are required to implement appropriate training and scripts to all client facing representatives;
- (c) retail clients must obtain personal financial product advice before investing in Arminius Capital GMMA Fund unless they can demonstrate an appropriate level of financial literacy and understanding of the risks of investing in Arminius Capital GMMA Fund.

7.3 Quay will take reasonable steps to ensure its marketing strategy and the marketing strategy of distributors is targeting retail clients within Target Market. All marketing campaigns are reviewed and approved by Quay prior to publication.

8. ADEQUACY OF DISTRIBUTION CONDITIONS

8.1 Quay has determined that the distribution conditions and restrictions will make it likely that retail clients who purchase the Arminius Capital GMMA Fund are in the class of retail clients for which it has been designed. We consider that the distribution conditions are appropriate and will assist distribution being directed towards the target market for whom the Arminius Capital GMMA Fund has been designed.

SECTION D – REVIEW AND MONITORING

9. REVIEW

9.1 Quay reviews this Target Market Determination in accordance with the below:

Initial Review:	Within three months of the effective date.
Periodic Reviews:	Annually after the initial review.
Review Triggers:	<p>When any event or circumstance arises that suggests the Target Market Determination is no longer appropriate. This includes (but is not limited to):</p> <ul style="list-style-type: none"> • receipt of a Product Intervention Power order from ASIC requiring Quay to cease retail distribution of the Arminius Capital GMMA Fund; • material changes to the key attributes of the Arminius Capital GMMA Fund; • the occurrence of a significant dealing including when distribution occurs outside the target market; • where the distribution conditions are found to be inadequate; • the liquidity of the product has changed and is found to be inadequate; • external events such as adverse media coverage or regulatory attention;

	<ul style="list-style-type: none"> • significant changes in metrics, including, but not limited to, receipt of a large volume of complaints by Quay or one of our distributors; and • where Quay detects issues with the distribution of the Arminius Capital GMMA Fund through the monitoring of daily business activities as well as the monitoring and supervision of distributors.
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10. DISTRIBUTOR REPORTING REQUIREMENTS

10.1 Quay collects the following information from distributors in relation to this Target Market Determination:

Complaints	Quay's distributors report all complaints in relation to the Arminius Capital GMMA Fund covered by this Target Market Determination on a quarterly basis.
Significant Dealings	Quay's distributors report to Quay if they become aware of a significant dealing in relation to this Target Market Determination within ten (10) business days.
Feedback	Quay's distributors report all Retail Client feedback (including performance of the Arminius Capital GMMA Fund) in relation to the Arminius Capital GMMA Fund covered by this Target Market Determination on an annual basis.

SECTION E – CONCLUSION

11. CONCLUSION

11.1 Quay reserves the right to amend this Target Market Determination at any time.

11.2 For further information, please contact Quay by:

- (a) Phone: 1300 114 980;
- (b) Email: enquiries@quayfund.com.au;
- (c) Mail: PO Box R186, Royal Exchange NSW 1225; or
- (d) Quay's website: www.quayfund.com.au.