

Target Market Determination

Issuer	Pinnacle Fund Services Limited (PFSL)		
ABN	29 082 494 362	AFSL	238 371
Fund	Firetrail Absolute Return Fund - Class A	ARSN	624 135 879
APIR	WHT5134AU	ISIN	AU60WHT51348
Exchange Code	FTR01		
Date Approved	19 August 2021	TMD Version	1

SUMMARY	This product is likely to be appropriate for a consumer seeking capital growth to be used as a small allocation within a portfolio where the consumer minimum investment timeframe of 5 years, and a high risk/return profile.
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The Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth) (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 PFSL’s design and distribution obligations 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 for the Firetrail Absolute Return Fund - Class A before making a decision whether to invest in the product.

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 the 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)
Consumer's investment objective		
Capital Growth	Green	The Fund aims to outperform the RBA Cash Rate over the medium to long term.
Capital Preservation	Yellow	
Capital Guaranteed	Red	
Regular Income	Red	
Consumer's intended product use		
Solution / Standalone (75-100%)	Red	The Fund will typically hold 30 to 40 long positions and approximately 100 short positions (20 to 30 fundamentally driven short positions and 70 to 80 risk positions). The Fund will be leveraged through short selling and the use of derivatives. The net equity exposure of the Fund is typically -5% to +5% of the portfolio. The portfolio diversification of the Fund is Medium.
Core component (25-75%)	Red	
Satellite / small allocation (0-25%)	Green	
Consumer's investment timeframe		
Short (≤ 2 years)	Red	The minimum suggested timeframe for holding the product is 3 to 5 years.
Medium (> 2 years)	Green	
Long (> 8 years)	Green	
Consumer's risk (ability to bear loss) and return profile		
Very high	Green	The Fund's risk band is 6 (high). The Fund is classified as a hedge fund under ASIC Regulatory Guide 240. The Fund's hurdle rate is the higher of: i) 3% per annum; and ii) the RBA Cash Rate plus the management fee
High	Green	
Medium	Yellow	
Low	Red	
Minimum timeframe to request withdrawals		
Daily	Green	Withdrawal requests can be made daily, and must be received, verified and accepted by the Fund's unit registry prior to 12pm (Sydney time) on a Business Day.
Weekly	Green	
Monthly	Green	
Quarterly	Green	
Annually or longer	Green	

APPROPRIATENESS

PFSL 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.

Note: This section is required under RG 274.64–66

DISTRIBUTION CONDITIONS

Distribution channel

There are no distribution conditions

Review triggers

- Material change to the product description including key attributes
- Material deviation from benchmark / objective over sustained period
- Product has not performed as disclosed by a material degree and for a material period
- Determination by the issuer of an ASIC reportable 'significant dealing'
- Material 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 materially affects the product

MANDATORY REVIEW PERIODS

Review period	Maximum period for review
Initial review	1 year, 3 months
Subsequent review	3 years, 3 months

DISTRIBUTOR REPORTING REQUIREMENTS

Reporting requirement	Reporting period	Which distributors this 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 dealings outside of the target market, under s994F(6) of the Act. Report to issuer using FSC data standard for significant dealings.	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 of dealings outside the target market these should be reported to the issuer, including reason why acquisition is outside of target market, and whether acquisition under personal advice.	Within 10 business days following end of calendar quarter	All distributors
If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to PFSL using the method specified at: https://pinnacleinvestment.com/wp-content/uploads/Distributor-Reporting-Instructions.pdf		

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 and 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 downturn. 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.
Regular Income	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	
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)
Investible 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".
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	
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.
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.
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.
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.
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	

<p>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>	
<p>Daily/Weekly/Monthly/Quarterly/Annually or longer</p>	<p>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.</p>
<p>Distributor Reporting</p>	
<p>Significant dealings</p>	<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. 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"> • 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). <p>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> • 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). <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"> • it constitutes more than half of the distributor’s total retail product distribution conduct in relation to the product over the reporting period, • 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.