

# Target Market Determination

## *Bell Global Equities Fund – Platform Class*

### Introduction

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

The Bell Global Equities Fund (Fund) is issued by Product Disclosure Statement for two unit classes: Platform Class and Wholesale Class. This Target Market Determination (TMD) is in respect of the Fund Platform Class unit (product). If you are seeking the TMD for the Fund Wholesale Class unit then please refer to the “Target Market Determination – Bell Global Equities Fund – Wholesale Class” available at [www.bellasset.com.au](http://www.bellasset.com.au).

This document is **not** a product disclosure statement (**PDS**) and is **not** a complete 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 PDS for the product before making a decision whether to buy 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, unless otherwise defined. The PDS can be obtained from [www.bellasset.com.au](http://www.bellasset.com.au).

### Target Market Summary

The Fund invests in a diversified portfolio of global equity securities and aims to generally follow a strategic asset allocation guideline of 0 to 10% in cash and 90% to 100% in global equity securities with risk countries defined as ‘developed’ by Morgan Stanley Capital International (MSCI) and may invest in constituents & non-constituents of the MSCI Indices. It is likely to be consistent with the financial situation and needs of a consumer who is seeking capital growth with at least a 5 year investment timeframe and who is unlikely to need to withdraw their money on less than one week’s notice.

This product is intended for use by consumers with a Medium or higher risk and return profile, depending on the proportion of their Investable Assets which is allocated to the product.

A consumer with a Medium risk profile is within the target market if their investment is Minor or Satellite in nature, being less than 25% of their Investable Assets.

Consumers with higher risk profiles are also within the target market. A consumer with a higher risk and return profile (any of High, Very High and Extremely High) is within the target market if their investment is Minor, Satellite, or Core, being less than 50% of their Investable Assets.

A consumer who advises that their allocation of their Investable Assets in the Fund is subject to personal advice will be treated as being within the Funds Target Market notwithstanding other advised consumer attributes.

## Fund and Issuer identifiers

Issuer	Bell Asset Management Limited
Issuer ABN	84 092 278 647
Issuer AFSL	231091
TMD contact details	Tim Kelly Compliance Manager/ Company Secretary - Email: <a href="mailto:tkelly@bellasset.com.au">tkelly@bellasset.com.au</a> General Enquiries: DDOControl@bellasset.com.au
Fund name	<b>Bell Global Equities Fund – Platform Class</b>
ARSN	096 281 300
APIR Code	BPF0016AU
ISIN Code	AU60BPF00168
Market Identifier Code	XASX
Product Exchange code	BLL01
TMD issue date	2 October 2023
TMD Version	4.0
Distribution status of fund	Available for Distribution

## 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 and green rating methodology:



### 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.

A consumer will be assessed as not in the target market for the product if one or more of their Consumer Attributes correspond to a red “Not in target market” rating. However, a consumer who advises that their allocation of their Investable Assets into the Fund is subject to personal advice will be deemed as within the Funds Target Market notwithstanding other advised consumer attributes.

### Appropriateness

Bell Asset Management Limited 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 the features of this product in Column 3 of the table below are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2. When assessing the rating applied to a consumer attribute category, Bell Asset Management Limited have assessed the Fund on a standalone basis and not with respect to its peers or benchmark.

### Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (for example, with an intended product use of *minor allocation*). 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 balanced or moderate diversified portfolio with a minor allocation to growth assets. In this case, a product with a *High* risk/return profile may be consistent with the consumer’s objectives for that *minor allocation* notwithstanding that the risk/return profile of the consumer as a whole is *Medium*. In making this assessment, distributors should consider all features of a product (including its key attributes).



The FSC has provided more detailed guidance on how to take this *portfolio view* for diversification, available on the [FSC website \(www.fsc.org.au\)](http://www.fsc.org.au) This guidance only applies where a product is held as part of a diversified portfolio.

Consumer Attributes <i>[A description of the likely objectives, financial situation and needs of the class of consumers in the target market]</i>	TMD Indicator	Product description including key attributes
<b>Consumer's investment objective</b>		
Capital Growth	In target market	The investment return objective of the Fund is to outperform the MSCI World Ex Australia Index with net dividends reinvested and in Australian Dollars after fees and expenses (but before taxes) over rolling three-year periods.
Capital Preservation	Not in target market	
Income Distribution	Not in target market	
<b>Consumer's intended product use (% of Investable Assets)</b>		
Solution/Standalone (up to 100%)	Not in target market	The Fund invests in a portfolio of global equity securities and aims to generally follow a strategic asset allocation guideline of 0 to 10% in cash and 90% to 100% in global equity securities with risk countries defined as 'developed' by MSCI and may invest in constituents & non-constituents of the MSCI Indices.
Major allocation (up to 75%)	Not in target market	
Core Component (up to 50%)	In target market	A consumer with a Medium risk profile is within the target market if their investment is Minor or Satellite in nature, being less than 25% of their Investable Assets.
Minor allocation (up to 25%)	In target market	
Satellite allocation (up to 10%)	In target market	Consumers with higher risk profiles are also within the target market. A consumer with a higher risk and return profile (any of High, Very High and Extremely High) is within the target market if their investment is Minor, Satellite, or Core , being less than 50% of their Investable Assets.
<b>Consumer's investment timeframe</b>		

Consumer Attributes <i>[A description of the likely objectives, financial situation and needs of the class of consumers in the target market]</i>	TMD Indicator	Product description including key attributes
Minimum investment timeframe	Five (5) investment timeframe	The minimum suggested timeframe for investment is at least five years.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>		
Low	Not in target market	The Fund is intended to be suitable for consumers who wish to gain exposure to global equities, who have a low requirement for income to be provided by this investment and who have a high appetite for investment risk.
Medium	In target market	This Fund will be appropriate as a Core holding (i.e. up to 50% of their investment portfolio) for consumers who can accept high volatility and potential losses (e.g. has the ability to bear up at least 6 negative returns over a 20 year period (SRM 6 or above) and seeks high returns (typically over a medium or long timeframe).  THE Fund will be appropriate as a Satellite or Minor holding (i.e. up to 25% of their investment portfolio) for consumers who can accept medium volatility and potential losses (e.g. has the ability to bear up at least 3 negative returns over a 20 year period (SRM 4 or above) and seeks high returns (typically over a medium or long timeframe).
High	In target market	
Very high	In target market	
Extremely high	In target market	
<b>Consumer's need to access capital</b>		
Within one week of request	In target market	Withdrawal requests must be received by the Fund's custodian by 2pm on a Business Day (i.e. a day, other than a Saturday or Sunday on which banks are open for business in Melbourne) to receive the Withdrawal Price for that Business Day.
Within one month of request	In target market	
Within three months of request	In target market	
Within one year of request	In target market	A withdrawal request will usually be satisfied within 10 Business Days by payment of the withdrawal proceeds to the investor's nominated bank account (although the
Within 5 years of request	In target market	

Consumer Attributes <i>[A description of the likely objectives, financial situation and needs of the class of consumers in the target market]</i>	TMD Indicator	Product description including key attributes
Within 10 years of request	In target market	Fund's constitution permits up to 30 days for withdrawal proceeds to be paid). In some circumstances, such as when there is a freeze or suspension on withdrawals, investors may not be able to withdraw their funds within the usual period.
10 years or more	In target market	
At issuer discretion	Not Applicable	If the Fund ceases to be liquid, for the purposes of the Corporations Act, then an investor may only withdraw from the Fund in accordance with the terms of a withdrawal offer (if any) made by Bell Asset Management Limited in accordance with the Corporations Act. Bell Asset Management Limited anticipates that the Fund will be liquid.

## Distribution conditions/restrictions

Distribution Conditions	Distribution Condition Rationale	<i>Distributors this condition applies to</i>
<p>Distributors have appropriate arrangements in place to distribute only to AFSL Holders or Wholesale Investors in accordance with the distribution agreement. In accordance with the distribution agreement, which prohibits the Distributor from marketing or promoting the Fund or giving any advice about the Fund to any person who is not a Wholesale Investor or an AFSL Holder.</p>	<p>Only permit distribution through other AFSL Holders or to Wholesale Investors</p>	<p><b>Contracted Distributors</b> AFSL holders that have a specific distribution agreement with Bell Asset Management Limited.</p>
<p>The Fund is permitted to be distributed via platforms. The issuer of each platform 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. For a consumer to access the product they must read and access the PDS.</p>	<p>To ensure that that investors are subject to personal advice or are within the Fund's target market.</p>	<p><b>Platforms</b> Specified distributors or distribution channels such as an investment or superannuation platforms or wrap products.</p>
<p>1. Investors will be contacted by an experienced representative of Bell Asset Management Limited and asked a series of questions in order to allow Bell Asset Management to understand whether the consumer is within the target market. These questions will align to the attributes in this TMD.</p> <p>2. Following this, if the consumer has been assessed as being unlikely to be in the target market, the Bell Asset Management Limited representative will inform the investor based on responses to certain knock-out questions this application will be rejected.</p>	<p>To ensure unadvised investors are within the Fund's target market.</p>	<p><b>Direct investment</b> Investors who are not subject to personal advice, apply directly in the Fund via the Fund's physical PDS application form or where available, via ASX mFunds.</p>

These distribution conditions and restrictions are designed to minimise the possibility of customers outside of the target market being issued units in the Fund. We consider that the distribution conditions are appropriate and will assist distribution being directed towards the target market for whom the Fund has been designed.

## Review triggers

The following review triggers will be used by the Responsible Entity to formally consider the appropriateness of the this TMD as part of its product governance arrangements.

If there was a material change to key Fund features, fees or investment objective that Bell Asset Management Limited determines requires prior approval of Fund investors in accordance with the Fund Constitution
If the actual performance of the Fund is more than 1.25% less than the benchmark / objective over rolling 3 year periods (calculated monthly) for a consecutive period of 12 months.
If BAM has determined that it is unable to effectively implement the Fund investment strategy as documented in the Fund PDS
If BAM was required to report a Significant Dealing to ASIC.
If BAM received a significant number of complaints (as defined in Section 994A(1) about the Fund or distribution of the Fund
If ASIC exercised any Product Intervention Powers, regulatory orders or directions specifically affecting the Fund

## Mandatory TMD review periods

Review period	Maximum period for review
Initial review	Not Applicable – initial review period has already occurred
Subsequent review	Within every period of 2 years from the TMD Issue Date previous review date



## 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. The distributor should provide all the content of the complaint, having regard to privacy.	As soon as practicable but no later than 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

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to Bell Asset Management Limited by email at: [DDOControl@bellasset.com.au](mailto:DDOControl@bellasset.com.au) Data reports submitted must in accordance with the current version of the FSC Data Standards (Version 2.0)

## Disclaimer

Bell Asset Management Limited is the Responsible Entity and Issuer of Bell Global Equities Fund.

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 Fund, 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 BAM's design and distribution arrangements for the Fund. Important terms used in this TMD are defined in the Definitions section of this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The TMD is not a product disclosure statement and is not a summary of the Fund features or terms of the Fund.

The TMD has been prepared by BAM for information purposes only and does not take into consideration the investment objectives, financial circumstances or needs of any particular recipient – it contains general information only. Before making any decision in relation to the Fund, you should consider your needs and objectives, consult with a licensed financial adviser and obtain a copy of the product disclosure statement, which is available by calling BAM on (03) 9616 8619 or visiting [www.bellasset.com.au](http://www.bellasset.com.au).

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to purchase or advice in relation to any securities within or of units in any investment fund or other investment product described herein. Any such offer shall only be made pursuant to an appropriate offer document. Past performance is not indicative of future performance.

## Definitions

In some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Term	Definition
<b>Consumer's investment objective</b>	
Capital Growth	The consumer seeks to invest in a product designed or expected to generate capital return over the investment timeframe. 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 designed or expected to have low volatility and minimise capital loss. The consumer prefers exposure to defensive assets that are generally lower in risk and less volatile than growth investments (this may include cash or fixed income securities).
Income Distribution	The consumer seeks to invest in a product designed or expected to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (this may include high dividend-yielding equities, fixed income securities and money market instruments).
<b>Consumer's intended product use (% of Investable Assets)</b>	
Solution/Standalone (up to 100%)	The consumer may hold the investment as up to 100% of their total <i>investable assets</i> . The consumer is likely to seek a product with <i>very high</i> portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>high</i> portfolio diversification.
Core Component (up to 50%)	The consumer may hold the investment as up to 50% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>medium</i> portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>low</i> portfolio diversification.

Term	Definition
Satellite allocation (up to 10%)	The consumer may hold the investment as up to 10% of the total <i>investable assets</i> . The consumer may seek a product with <i>very low</i> portfolio diversification. Products classified as <i>extremely high</i> risk are likely to meet this category only.
<i>Investable Assets</i>	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> Note: exposures to cash and cash-like instruments may sit outside the diversification framework below.	
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).
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).
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).
High	The product provides exposure to a large number of holdings (for example, over 50 securities) in more than one broad asset class, sector or geographic market (for example, global equities).
Very high	The product provides exposure to a large number of holdings across a broad range of asset classes, sectors <u>and</u> geographic markets with limited correlation to each other.
<b>Consumer's intended investment timeframe</b>	
Minimum	The minimum suggested timeframe for holding the product. Typically, this is the rolling period over which the investment objective of the product is likely to be achieved.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>	

Term	Definition
	<p>This TMD uses the Standard Risk Measure (<b>SRM</b>) to estimate the likely number of negative annual returns for this product over a 20 year period, using the guidance and methodology outlined in the <u><a href="#">Standard Risk Measure Guidance Paper For Trustees</a></u> (note the bands in the SRM guidance differ from the bands used in this TMD). However, SRM 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. For example, some products may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating.</p> <p>A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>
Low	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a conservative or low risk appetite,</li> <li>• seeks to minimise volatility and potential losses (e.g. has the ability to bear up to 1 negative return over a 20 year period (SRM 1 to 2)), and</li> <li>• is comfortable with a low target return profile.</li> </ul> <p>The consumer typically prefers stable, defensive assets (such as cash).</p>
Medium	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a moderate or medium risk appetite,</li> <li>• seeks low volatility and potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)), and</li> <li>• is comfortable with a moderate target return profile.</li> </ul> <p>The consumer typically prefers defensive assets (for example, fixed income).</p>
High	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a high risk appetite,</li> <li>• can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)), and</li> <li>• seeks high returns (typically over a medium or long timeframe).</li> </ul> <p>The consumer typically prefers growth assets (for example, shares and property).</p>

Term	Definition
Very high	<p>For the relevant part of the consumer’s portfolio, the consumer:  has a very high risk appetite,  can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)), and  seeks to maximise returns (typically over a medium or long timeframe).</p> <p>The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).</p>
Extremely high	<p>For the relevant part of the consumer’s portfolio, the consumer:  has an extremely high risk appetite,  can accept significant volatility and losses, and  seeks to obtain accelerated returns (potentially in a short timeframe).</p> <p>The consumer seeks extremely high risk, speculative or complex products which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes (for example, crypto-assets or collectibles).</p>
<b>Consumer’s need to access capital</b>	
<p>This consumer attribute addresses the likely period of time between the making of a request to access capital and the receipt of proceeds under ordinary circumstances. Issuers should consider both the frequency for accepting requests to access capital and the length of time to accept, process and distribute the proceeds of a request. 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 aligning the product to the consumer’s need to access capital. Where a product is held on investment platforms, distributors also need to factor in the length of time platforms take to process capital access requests for underlying investments. Where access to investment proceeds from the product is likely to occur through a secondary market, the liquidity of the market for the product and likely realisable value on market should be considered, including in times of market stress.</p>	

Term	Definition
<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 and/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 quarter,</li> <li>• the consumer’s intended product use is <i>solution/standalone</i>,</li> <li>• the consumer’s intended product use is <i>core component</i> or higher and the consumer’s risk/return profile is <i>low</i>, or</li> <li>• the relevant product has a green rating for consumers seeking <i>extremely high</i> risk/return.</li> </ul>