

Target Market Determination

For Bendigo SmartStart Pension®

STL-BSSP

Product

This target market determination (TMD) applies to Bendigo SmartStart Pension®.

USI code (product)	STL0050AUBSSP
Name of fund	The Bendigo Superannuation Plan
Fund ABN	57 526 653 420

Issuer

Sandhurst Trustees Limited ABN 16 004 030 737, AFSL 237906 (Sandhurst Trustees), a wholly owned subsidiary of Bendigo and Adelaide Bank Limited ABN 11 068 049 178 AFSL / ACL 237879 (Bendigo Bank).

Date from which this target market determination is effective

5 October 2021.

1. Target market for this product

Target Market

The retail clients for whom this product has been designed are individuals who:

- (for the Standard Pension) have reached preservation age* and have permanently retired, or have reached the age of 65, or have left or changed job after the age of 60, or have suffered permanent incapacity;
- (for the Transition to Retirement (TTR) Pension) have reached preservation age* and are still working;
- want to hold wealth and draw income from an account-based pension phase product; and
- can make a minimum investment of \$10,000.

*Preservation age is between 55 and 60 depending on when the retail client was born.

Product Description

Bendigo SmartStart Pension is an account-based pension phase product that allows a retail client to have a source of income by drawing down their superannuation savings once they have reached preservation age. The product is not a self-managed super fund, and it does not have a guaranteed level of regular payments.

There are two types of pensions to choose from: (1) Standard Pension and (2) TTR Pension. The product has a limited investment menu that contains a cash investment option (Cash Account) and a range of managed funds. Flexibility is available for managing income distributions received from any managed fund investment options and how the Cash Account investment level is maintained.

Product key attributes

The key attributes of this product that make it likely to be consistent with the target market described above, include:

Attribute	Appropriate for
Eligibility for types of pension	<p>For the Standard Pension, retail clients to whom one of the following apply:</p> <ul style="list-style-type: none"> • they have permanently retired and have reached their preservation age; • they have reached the age of 65; • they have left or changed jobs after the age of 60; and • they have suffered permanent incapacity. <p>For the TTR Pension, retail clients who have reached the preservation age but are still working.</p> <ul style="list-style-type: none"> • Retail clients who are physically present in Australia when they apply.
Minimum investment	<p>Retail clients who can make an investment of at least \$10,000. The investment can only be made from:</p> <ul style="list-style-type: none"> • rolling over funds from another super fund; • using some or all of the balance in a Bendigo SmartStart Super account; or • a one-off personal contribution (that is not tax deductible) • a combination of the above.
Drawdown rules	<p>Retail clients who commence their pension before 1 June will withdraw at least the minimum amount as pension payment from their account each financial year. The minimum amount depends on the retail client's age.</p> <p>In addition, for retail clients with a TTR Pension, they accept that there is an annual maximum pension amount.</p>
Investment options	<p>Retail clients who:</p> <ul style="list-style-type: none"> • want to hold 1.5% or more of their account balance in the Cash Account; and • for the remaining balance, want to <ul style="list-style-type: none"> ○ invest in the product's default investment strategy; or ○ make their own investment selection from a limited investment menu containing managed funds to suit a range of risk/return profiles within the following options: <ol style="list-style-type: none"> 1. Ready-made diversified options <ol style="list-style-type: none"> a) Passive options with risk/return profiles ranging from low to high b) Active options with risk/return profiles ranging from low to high 2. Sector-specific options <ol style="list-style-type: none"> a) Fixed income option with a low risk/return profile b) Cash option with a very low risk/return profile c) Socially responsible investment option with a medium to high risk/return profile
Investment instructions	<p>Retail clients who want to have flexibility in either managing their investment strategy (e.g. deposit instruction, income distribution payment option and Cash Account top up strategy) or who want to let the trustee manage them.</p>
Fees and costs	<p>Retail clients willing to pay the fees and costs associated with the product.</p>

2. How this product is to be distributed

Sandhurst Trustees applies certain conditions and restrictions to the distribution of this product so that distribution is likely to be to retail clients within the target market for this product. The conditions and restrictions are:

Channel	<p>This product is to be distributed only through the following channels:</p> <ul style="list-style-type: none"> • Bendigo Bank and Community Bank branches; • Approved financial advisers; • Bendigo Bank's Wealth Concierge; • Bendigo Bank website; and • Other forms of direct marketing, e.g. internet, social media, advertisements and mail.
Additional conditions or restrictions	<p>The following additional conditions and restrictions also apply to the distribution of this product:</p> <ul style="list-style-type: none"> • A copy of the Product Disclosure Statement and any material incorporated by reference (PDS) must be provided to the retail client before they submit an application for this product; • This product can only be distributed to individuals who have reached pension age; • This product can only be distributed to individuals who can make an application in Australia; • Retail clients who are physically present in Australia when they apply; • This product can only be issued (or arranged to be issued) by persons who are trained by the respective distribution channels and with relevant accreditation (if required in dealing with the product); and • Distributors will be guided and supervised by Sandhurst Trustees so that distribution is more likely to be consistent with the TMD.

In addition to the above, the following distribution conditions will also apply to the relevant distribution channel.

Channel	Distribution conditions/restrictions
Bendigo Bank and Community Bank Branches	<p>Branch staff must:</p> <ul style="list-style-type: none"> • provide factual product information only; and • be trained before providing relevant information about the product to retail clients.
Approved financial advisers (AFA)	<p>Financial advisers must:</p> <ul style="list-style-type: none"> • by conduct or agreement, agree to Sandhurst Trustees' terms before they can distribute the product; and • hold an Australian financial services (AFS) licence or hold an authorisation from a licensee to provide superannuation product advice and deal in a superannuation product.
Bendigo Bank's Wealth Concierge	<p>Wealth Concierge staff must:</p> <ul style="list-style-type: none"> • be authorised by an AFS licensee to at least provide general product advice in superannuation and deal in a superannuation product; • be trained before providing relevant information about or general advice on the product to retail clients; and • refer retail clients who want personal product advice to an AFA.
Direct marketing via the Bendigo Bank website or other methods	<p>All public facing content or documentation related to the product must be consistent with the product's PDS and this TMD.</p>

3. Reviewing this target market determination

Sandhurst Trustees will review this TMD as set out below:

Initial review	Within the first year of the effective date.
Periodic reviews	At least every 12 months from the initial review.
Review triggers or events	<p>Any event or circumstances arising that would reasonably suggest the TMD is no longer appropriate. This may include (but is not limited to):</p> <ul style="list-style-type: none"> ○ A major change to the design or distribution of the product, including related documentation; ○ occurrence of a significant dealing; ○ distribution conditions found to be inadequate in ensuring that the product is issued to retail clients who are likely to be in the target market; ○ relevant changes in the law or its application, a change in an industry code or decision of a court or other body (including through regulatory guidance) that materially affects the product; ○ significant changes in metrics, including, but not limited to: ○ a material increase in the number of complaints in relation to the product or aspect of the product; and ○ an increase in early termination of the product; and ○ any other event occurs, or information is received that reasonably suggests this TMD is no longer appropriate.

4. Reporting and monitoring this target market determination

Sandhurst Trustees' third-party distributors who are regulated persons will need to collect, keep and report the following information to Sandhurst Trustees:

Type	Description of information	Frequency of reporting
Complaints	<p>Retail client complaints made in relation to this product where the nature of the complaints relate to product design, product availability and distribution conditions. This includes:</p> <ul style="list-style-type: none"> • written details of the complaint; and • the number of complaints during the reporting period. 	<p>Reporting period: Quarterly</p> <p>When does the regulated person have to report: Within 10 business days of the end of the reporting period</p>
Sales data	Sales and customer data in relation to this product as requested by Sandhurst Trustees.	<p>Reporting period: Quarterly</p> <p>When does the regulated person have to report: Within 10 business days of the end of the reporting period</p>
Significant dealings	<p>The following information:</p> <ul style="list-style-type: none"> • a description of the significant dealing; • the date (or range) on which the significant dealing occurred; • why the distributor considers the dealing to be significant (including why it is inconsistent with this TMD); and • how the dealing was identified. 	<p>When does the regulated person have to report: Within 10 business days of the distributor becoming aware of the dealing.</p>