

# Target Market Determination

## For the Sandhurst IML Industrial Share Fund

STL-SIML

### Product

This target market determination (TMD) applies to the Sandhurst IML Industrial Share Fund (SIML).

<b>Fund</b>	Sandhurst IML Industrial Share Fund
<b>Issuer and Responsible Entity</b>	Sandhurst Trustees Limited ABN 16 004 030 737 AFSL 237906 (Sandhurst Trustees), a subsidiary of Bendigo and Adelaide Bank Limited ABN 11 068 049 178 AFSL / Australian Credit Licence 237879 (Bendigo Bank)
<b>ARSN</b>	095 143 294
<b>APIR</b>	STL0101AU
<b>Effective Date</b>	15/08/2024
<b>Version</b>	4

## 1. Target market for this product

### Target Market

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

- want long term capital growth and income;
- want a high risk investment;
- want an investment with a time horizon of at least five (5) years;
- can make an initial investment of at least the minimum investment amount (generally \$50,000);
- want the ability to make additional contributions to their investment (including through regular periodic contributions);
- want half yearly income distributions; and
- want to indirectly gain exposure to ASX listed industrial shares (excluding resource shares) where these assets are identified by the investment manager as being undervalued.

### Product Description

The SIML is a managed fund scheme for retail clients seeking a high risk investment, who are looking for long term capital growth and income from a diversified portfolio of ASX listed industrial shares through another fund with at least a 5 year time horizon. This fund also allows investors to receive half-yearly income distributions.



Sandhurst manages the Fund by investing in the Sandhurst Industrial Share Fund (ARSN 090 472 325, APIR STL0100AU) (Underlying Investment), for which Sandhurst is the responsible entity, and in which the assets are managed by Investors Mutual Limited (IML) (ABN 14 078 030 752, AFSL No. 229988).

### Product key attributes

Retail clients eligible for this product are Australian residents and retail clients who are non-residents residing in Australia.

#### *TMD indicator key\**

The Retail client Attributes for which the product is likely to be appropriate have been assessed using a red/green rating methodology with appropriate colour coding:

-  In target market
-  Not considered in target market

#### *Instructions*

In the tables below, Column 1 'Retail client Attributes', indicates a description of the likely objectives, financial situation and needs of the class of retail clients that are considering this product. Refer to the Instructions and Key Definitions document for definitions

of Retail client Attributes. Column 2, TMD indicator, indicates whether a retail client meeting the attribute in column 1 is likely to be in the target market for this product. Generally, a retail client is unlikely to be in the target market for the product if:

- **one or more** of their Retail client Attributes correspond to a red rating

#### *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 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.

#### *Investment products and diversification*

A retail client (or class of retail client) 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 retail client's attributes for the relevant portion of the portfolio, rather than the retail client's portfolio as a whole. For example, a retail client 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 retail client's objectives for that minor allocation notwithstanding that the risk/return profile of the retail client as a whole is Medium. In making this assessment, distributors should consider all features of a product (including its key attributes). The key attributes of this product that make it likely to be consistent with the target market described above include:

Retail client Attributes	TMD Indicator	Product description including key attributes
Retail client's investment objective*		
Capital Growth	Green	To deliver investment returns before fees above the S&P / ASX 300 Industrial Accumulation Index on a rolling four-year basis.
Capital Preservation	Red	The Fund expects to invest predominantly in the Underlying Investment. To the extent that the Fund does so, it will be exposed to a diversified portfolio of quality ASX listed industrial shares (excluding resource shares) where these assets are identified by IML as being undervalued.
Capital Guaranteed	Red	The Fund invests 80% to 100% of its assets in the Underlying Investment (with the uninvested portion held in cash).
Income Distribution	Green	
Retail client's intended product use (% of Investable Assets)*		
Whole Portfolio Solution (Up to 100%)	Red	The Sandhurst IML Industrial Share Fund is a managed fund scheme for retail clients seeking a high risk investment, who are looking for long term capital growth and income, from a diversified portfolio of ASX listed industrial shares (excluding resource shares) with at least a 5 year time horizon. This fund also allows investors to receive half-yearly income distributions.
Major Allocation (Up to 75%)	Red	The strategic asset class allocation range of the Underlying Investment are: <ul style="list-style-type: none"> <li>• Australian shares (industrial) Min 80% - Max 100%</li> <li>• Cash and short-term securities Min 0% - Max 20%</li> </ul>
Core Component (Up to 50%)	Green	
Minor Allocation (Up to 25%)	Green	The strategic asset class allocation provides an indication of the intended holdings and actual holdings may be higher or lower. In exceptional market conditions the Fund may have asset class allocations outside the stated minimum and maximum for short periods of time.
Satellite Allocation (Up to 10%)	Green	While the assets of the Fund are predominantly invested in listed shares, up to 10% of its assets may be invested in unlisted shares, where these shares are expected to list on the ASX within 12 months of making the investment.
Retail client's investment timeframe		
Minimum investment timeframe	5 years or longer	Minimum suggested investment period is 5 years.
Retail client's Risk (ability to bear loss) and Return profile*		
Low	Red	This Fund is considered by Sandhurst to be a high risk investment. The retail client has a more aggressive appetite, seeks to maximise returns and can accept higher potential losses (e.g. has the ability to bear up to 6 negative annual returns over a 20 year period (SRM 6).
Medium	Red	
High	Green	
Very High	Red	

Retail client Attributes	TMD Indicator	Product description including key attributes
Retail client's need to access capital*		
Within one day of request	Red	Retail clients who generally do not require access to invested funds for at least 5 years (as the minimum suggested investment period is 5 years).
Within one week of request	Green	Retail clients may make withdrawals, subject to the fund's constitution. A minimum withdrawal amount may apply, and funds will be credited to the retail client's nominated account (normally within 5 business days although a longer period may apply in certain circumstances). Retail Clients can decrease their investment by withdrawing some or all of their units by sending Sandhurst a completed Withdrawal Form. If the Withdrawal Form is received and accepted before 12 noon Melbourne time on a business day, the withdrawal will be processed using the Fund's withdrawal price calculated as at the close of business on that day. Otherwise, the following business day's withdrawal price will be used.
Within one month of request	Green	
Within three months of request	Green	If the Retail Clients makes a withdrawal request which would result in their investment balance falling below \$50,000, Sandhurst may, at its discretion, treat the withdrawal request as relating to all the Retail Clients remaining units in the Fund.
Within one year of request	Green	
Within five years of request	Green	

\*Refer to the Instructions and Key Definitions Document for further information.

## 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:

Distribution Channel	Distribution conditions/restrictions
Approved financial advisers	<p>Financial advisers must:</p> <ul style="list-style-type: none"> <li>by conduct or agreement agree to the terms with the issuer before they can distribute the product.</li> <li>have the relevant licence and authority to distribute the product</li> </ul>
Direct through online applications on Sandhurst Trustees website	<ul style="list-style-type: none"> <li>Specific content about the product and information to assist customers in determining the appropriate investment solution for their circumstances is provided on the Bendigo Bank website, which is linked to the Sandhurst Trustees website.</li> <li>All public facing content about or documentation related to the product must be consistent with the product's PDS and this TMD: and</li> <li>The fund application process will include questions to filter out applicants who do not fall within the target market and will remind applicants to review the PDS and seek professional advice before making a decision.</li> </ul>
Bendigo Bank and Community Bank Branches	<p>Branch staff must:</p> <ul style="list-style-type: none"> <li>provide factual product information only;</li> <li>be trained before providing relevant information about the product to retail clients;</li> <li>direct retail clients to the relevant information and online application process, with the appropriate consent (if required); and</li> <li>comply with the fund application process which includes questions to filter out applicants who do not fall within the target market.</li> </ul>

Distribution Channel	Distribution conditions/restrictions
Bendigo Bank's Wealth Concierge	<p>Wealth Concierge staff must:</p> <ul style="list-style-type: none"> <li>be authorised from an AFS licensee to at least provide general product advice and deal in a financial product.</li> <li>be trained before providing relevant information about or general advice on the product to retail clients; and</li> <li>refer retail clients who want personal product advice to a financial adviser.</li> </ul>
Platform Investors	<p>Platform Investors must:</p> <ul style="list-style-type: none"> <li>by conduct or agreement agree to the terms with the issuer Sandhurst Trustees before they can distribute the product.</li> <li>have the relevant license and authority to distribute the product; and</li> <li>provide or direct retail clients to the relevant PDS</li> </ul>

### 3. Reviewing this target market determination

Sandhurst Trustees will review this TMD as set out below:

<b>Initial review</b>	Within the first year of the effective date.
<b>Periodic reviews</b>	At least every 12 months from the initial review.
<b>Review triggers or events</b>	<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"> <li>a material change to the design or distribution of the product, including related documentation;</li> <li>occurrence of a significant dealing;</li> <li>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;</li> <li>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;</li> <li>significant changes in metrics, including, but not limited to: <ul style="list-style-type: none"> <li>a material increase in the number of complaints in relation to a product or aspect of a product; and</li> <li>an increase in withdrawals, as a proportion of account balances, from of the product; and</li> <li>any other event occurs, or information is received that reasonably suggests this TMD is no longer appropriate.</li> </ul> </li> </ul>

### 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
<b>Complaints</b>	<p>Customer complaints made in relation to this product. This includes:</p> <ul style="list-style-type: none"> <li>written details of the complaint; and</li> <li>the number of complaints during the reporting period.</li> </ul>	<p><b>Reporting Period:</b> Quarterly</p> <p><b>When does the regulated person have to report:</b></p> <p>Within 10 business days of the end of the reporting period.</p>

Type	Description of information	Frequency of reporting
Sales data	Sales and customer data in relation to this product as requested by Sandhurst Trustees.	<b>Reporting Period:</b> Monthly <b>When does the regulated person have to report:</b> Within 10 business days of the end of the reporting period.
Significant dealings	The following information: <ul style="list-style-type: none"> <li>• details of the significant dealing;</li> <li>• the date (or range) on which the significant dealing occurred;</li> <li>• why the distributor considers the dealing to be significant (including why it is inconsistent with this TMD); and</li> <li>• how the dealing was identified.</li> </ul>	<b>When does the regulated person have to report:</b> Within 10 business days of the distributor becoming aware of the dealing.

#### Important Information

This target market determination is not a recommendation, opinion or advice that any person acquire the product or is within the target market for the product. It does not summarise the terms or risks of the product and is not an offer of, or invitation to apply for, the product to any person in Australia or elsewhere. [Click here](#) or visit [bendigobank.com.au/important-information/target-market-determinations](http://bendigobank.com.au/important-information/target-market-determinations) for more information about target market determinations. [Click here](#) or visit [bendigobank.com.au/managed-funds/Sandhurst-iml-industrial-share-fund](http://bendigobank.com.au/managed-funds/Sandhurst-iml-industrial-share-fund) for information about the product and applicable fees and charges.