

# Target Market Determination

## For the Sandhurst Investment Term Fund

STL-ITF

### Product

This target market determination (TMD) applies to the Sandhurst Investment Term Fund (SITF).

<b>Fund</b>	Sandhurst Investment Term 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>	090 908 660
<b>APIR</b>	No APIR registered
<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 regular income and capital stability;
- want a low risk investment;
- can make an initial investment of at least the minimum investment amount (generally \$2,000);
- want choices of fixed investment term periods from 3 months to 5 years;
- want to invest in income-generating assets, including mortgage backed assets and direct mortgages;
- want access to Bendigo Bank's online banking services; and
- want monthly or quarterly income distributions depending on the nominated term.

### Product Description

The SITF is a managed fund scheme for retail clients who want a low risk investment in income-generating assets, including mortgage backed assets and direct mortgages and non-mortgage assets. The Fund offers choices of fixed investment term periods from 3 months to 5 years with different distribution frequencies depending on the term chosen.



### Product key attributes

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

Retail clients who 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	Red	To provide regular income and capital stability by investing assets of the Fund in a broad selection of mortgage backed assets, direct mortgages and other income producing assets. The neutral position of the Fund is 85% direct mortgages and mortgage backed assets and 15% non-mortgage assets.  Retail clients who want regular income through distributions with monthly or quarterly frequencies (dependant on the term chosen). Retail clients can elect to reinvest distributions or have them paid out.
Capital Preservation	Green	
Capital Guaranteed	Red	
Income Distribution	Green	
Retail client's intended product use (% of Investable Assets)*		
Whole Portfolio Solution (Up to 100%)	Green	The Sandhurst Investment Term Fund is a managed fund scheme for retail clients seeking a low risk investment from mortgage backed assets, direct mortgages and other income producing assets. Retail clients can choose investment term periods from 3 months to 5 years. Different distribution frequencies are available depending on the term chosen.  The strategic asset class allocation: <ul style="list-style-type: none"><li>• Direct mortgages and mortgage backed assets Min 45% - Max 90%</li><li>• Deposits, money market securities and government backed securities Min 10% - Max 55%</li></ul> In exceptional market conditions the Fund may have asset class allocations outside the stated minimum and maximum for short periods of time.
Major Allocation (Up to 75%)	Green	
Core Component (Up to 50%)	Green	
Minor Allocation (Up to 25%)	Green	
Satellite Allocation (Up to 10%)	Green	
Retail client's investment timeframe		
Minimum investment timeframe	3 months to 5 years	Retail clients can choose investment term periods from 3 months to 5 years.

Retail client Attributes	TMD Indicator	Product description including key attributes
Retail client's Risk (ability to bear loss) and Return profile*		
Low	Green	Retail clients who want an investment with a low risk profile. The retail client is conservative or low risk in nature, seeks to minimise potential losses (e.g. has the ability to bear up to 1 negative annual return over a 20 year period (SRM 2)) and is comfortable with a low target return profile.
Medium	Red	
High	Red	
Very High	Red	
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 the term of investment selected (from 3 months to 5 years).  Withdrawals are not permitted from the Fund before maturity except for accounts with Rainy Day Access (only available for 3 year / 36 month terms). Rainy Day Access allows withdrawal at any time of up to 25% of the total amount invested for the term, without affecting your Anticipated Return.
Within one week of request	Red	Sandhurst may at its discretion consider an early withdrawal request (other than Rainy Day Access) from the Fund under special circumstances. Sandhurst reserves the right to reduce the rate of return payable on the investment if an early withdrawal is approved.
Within one month of request	Red	There is no minimum withdrawal amount and retail clients may apply to withdraw some or all of their investment.  If retail clients make a withdrawal request which would result in their investment balance falling below the minimum investment balance (\$2,000), Sandhurst may at its discretion treat the retail clients withdrawal request as relating to all of their remaining investment in the Fund.
Within three months of request	Green	Withdrawal requests are processed as soon as practicable (usually on the same day). However, under the Fund's Constitution we have 12 months to satisfy withdrawal requests and do not have a legal obligation to satisfy any withdrawal request within a shorter period. Sandhurst may also delay or refuse withdrawal requests if it is in the best interests of investors as a whole to do so.
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>

Distribution Channel	Distribution conditions/restrictions
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>
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 early withdrawals from the product; and</li> <li>an increase in withdrawals, as a proportion of account balances, from 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
Complaints	Customer complaints made in relation to this product. This includes: <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>	<b>Reporting period:</b> Quarterly <b>When does the regulated person have to report:</b> Within 10 business days of the end of the reporting period
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. Visit [bendigobank.com.au/important-information/target-market-determinations](https://bendigobank.com.au/important-information/target-market-determinations) for more information about target market determinations. Visit [bendigobank.com.au/managedfunds](https://bendigobank.com.au/managedfunds) for information about the product and applicable fees and charges.