

## Target Market Determination

This Target Market Determination (TMD) has been prepared and issued by Navigator Australia Limited (Operator, NAL) (ABN 45 006 302 987, AFSL 236466), as the issuer of the Shadforth Portfolio Service - Investment.

This TMD seeks to offer clients and distributors an understanding of the class of clients for which the Shadforth Portfolio Service - Investment has been designed, having regard to the objectives, financial situation and needs of the target market. It applies to the Shadforth Portfolio Service - Investment product referred to in the Offer Document available at [portfolio.sfg.com.au](http://portfolio.sfg.com.au)

It is **not** an Offer Document and is **not** to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. This document does not take into account any person's individual objectives, financial situation or needs. Clients must refer to the Offer Document available at [portfolio.sfg.com.au](http://portfolio.sfg.com.au) and any supplementary documents when making a decision about the product.

Shadforth Portfolio Service – Investment is an Investor Directed Portfolio Service (IDPS) which is a comprehensive investment and administration solution designed for clients working with a financial adviser. It offers an extensive range of investments to help the client design a unique portfolio that is tailored to their personal financial objectives.

## Target Market

Suitable for clients who:	Not suitable for clients who:
<ul style="list-style-type: none"><li>• want the freedom to tailor their investment solution</li><li>• looking for a one-stop solution to manage their investment needs</li><li>• are receiving financial advice from the Shadforth Financial Group</li><li>• have an understanding of the risks associated with investing</li><li>• prefer a wide and versatile range of investment choices and want to invest in one or a combination of the investment options which are made available through Shadforth Portfolio Service - Investment</li><li>• want the flexibility to monitor their investment as much as they'd like by checking their deposits, balance and transactions online</li><li>• want to cap their Administration Fee and/or potentially reduce their Administration Fee through family fee aggregation.</li></ul>	<ul style="list-style-type: none"><li>• are totally risk averse and cannot tolerate any losses with their investments</li><li>• are not receiving personal financial advice from the Shadforth Financial Group when applying for an account</li><li>• have not received the Offer Document within Australia</li><li>• are looking for a super product (other than as a Trustee of a Self-Managed Superannuation Fund)</li><li>• have less than \$10,000 (or \$2,500 with a Regular Savings Plan) to invest.</li></ul>

## Likely Objectives, Financial Situation and Needs of Consumers in the Target Market

Shadforth Portfolio Service – Investment has been designed for clients whose likely objectives, financial situation and needs are such that they are looking for:

- a comprehensive IDPS solution that can be tailored for their needs
- access to a broad range of managed investments, Separately Managed Account (SMA) Model Portfolios, the majority of fully paid ordinary, preference and equity shares, stapled securities, Exchange Traded Products (ETP), interest rate securities, Hybrids, Listed Investment Trusts (LIT) and Listed Investment Companies (LIC) listed on the Australian Securities Exchange (ASX) and maturing investments (including term deposits and fixed-term annuities)
- flexibility to monitor their investment by securely checking their deposits, balance and transactions online or via an app
- a cap on their Administration Fee and/or potentially reduce their Administration Fee through family fee aggregation.

**Please note:** Whilst the product is designed to be used with a Shadforth Financial Group financial adviser, direct retail clients are not excluded from continuing to hold an account in Shadforth Portfolio Service - Investment.

## Key Attributes

### Product attributes

The key attributes of Shadforth Portfolio Service - Investment are as follows:

- secure online access to account details with simple, fast and effective reporting
- access to a broad range of investments including managed investments (including the Strategic Funds and Specialist Funds), SMA Model Portfolios, the majority of fully paid ordinary, preference and equity shares, stapled securities, ETPs, interest rate securities, Hybrids, LITs and LICs listed on the ASX and maturing investments (including term deposits and fixed-term annuities)
- a fee structure, that includes an Administration Fee cap, and the potential to reduce your Administration Fee through family fee aggregation
- margin lending via a range of lenders.

### Investment attributes

Clients have a choice of investment options across 17 investment categories depending on their investment objective, preference for risk and return and investment timeframe.

An individual client, however, should have regard to the information provided in the Offer Document for this product before making an investment selection. The client may choose to invest in multiple options (with different characteristics) to meet their investment needs. Clients should speak to their financial adviser to determine which best suits their needs (where appropriate).

Investment Category	Usually held for a minimum of:	Investment Objective
Cash Funds	No minimum	To provide a secure return that is consistent with the prevailing market cash rate over any time frame with minimal risk of capital loss through exposure to assets that are predominantly cash and cash equivalents.
Diversified Conservative Funds	Short-Medium Term 2+ Years	To provide a diverse range of multi-asset defensive orientated investment options that offer varied strategies aiming to achieve relatively stable returns (in a risk adjusted manner) through the investment cycles. This can be delivered by investing in a range of income and some growth assets, while providing lower volatility and capital protection through a high weighting to defensive assets.
Alternatives <sup>1</sup>	Medium Term 5+ Years	To provide a diverse range of alternative investment options that offer varied investment strategies aiming to achieve moderate absolute returns with lower correlation to traditional assets (in a risk adjusted manner) through the investment cycles. This can be delivered by investing in a wide range of alternative investment strategies.
Australian Fixed Interest Funds <sup>2</sup>	Medium Term 4+ Years	To provide a diverse range of Australian fixed interest investment options that offer varied investment strategies aiming to achieve a return in excess of the cash rate through the investment cycles by investing in a variety of Australian fixed interest securities. The higher return potential comes with higher short-term volatility of returns.
Diversified Balanced Funds	Medium Term 5+ Years	To provide a diverse range of multi asset balanced orientated investment options that offer varied strategies aiming to achieve above inflation rate growth (in a risk adjusted manner) through the investment cycles. This can be delivered by investing in a balanced exposure across growth and defensive assets.

Investment Category	Usually held for a minimum of:	Investment Objective
International Fixed Interest Funds <sup>3</sup>	Medium Term 4+ Years	To provide a diverse range of international fixed interest investment options that offer varied investment strategies aiming to achieve a return in excess of the cash rate through the investment cycles by investing in a variety of international fixed interest securities. The higher return potential comes with higher short-term volatility of returns.
Exchange Traded Funds	Medium to Long Term 3 - 6+ Years	To provide a range of exchange-traded funds aiming to achieve returns in line with market indices through the investment cycles.
Australian Share Funds <sup>4</sup>	Long Term 7+ Years	To provide a diverse range of Australian share investment options that offer varied investment styles aiming to achieve a higher return than fixed interest and property securities through the investment cycles by investing in a variety of Australian listed companies. The higher return potential comes with higher short-term volatility of returns.
Commodities	Long Term 7+ Years	To provide a diverse range of commodities investment options that offer varied investment strategies aiming to achieve absolute returns with lower correlation to traditional asset classes through the investment cycles.
Diversified Growth Funds	Long Term 7+ Years	To provide a diverse range of multi asset growth orientated investment options that offer varied strategies aiming to achieve capital growth (in a risk adjusted manner) through the investment cycles. This can be delivered through a well diversified portfolio of growth assets with higher expected volatility.
Global Infrastructure Funds	Long Term 7+ Years	To provide a diverse range of global listed infrastructure investment options that offer varied investment strategies aiming to achieve a higher return than fixed interest and property securities through the investment cycles. This can be delivered by investing in a wide range of global listed infrastructure strategies. The higher return potential comes with higher short-term volatility of returns.
Global Share Funds <sup>5</sup>	Long Term 7+ Years	To provide a diverse range of international share investment options that offer varied investment styles aiming to achieve a higher return than fixed interest and property securities through the investment cycles by investing in a variety of international listed companies. The higher return potential comes with higher short-term volatility of returns.
Listed Investments - Australian Property Trusts	Long Term 6+ Years	To provide a higher return than cash and fixed interest securities over time through a variety of Australian listed property trusts. The higher return potential comes with higher short-term volatility of returns.
Listed Investments - Australian Shares	Long Term 6+ Years	To provide a diverse range of listed investment options that offer varied strategies aiming to achieve higher returns than fixed interest and property through the investment cycles from a variety of Australian listed companies. The higher return potential comes with higher short-term volatility of returns.
Listed Investments - High Yielding Investments	Long Term 6+ Years	To provide a range of listed high yielding investment options aiming to achieve a higher return than investment grade securities issued by Australian governments and banks through the investment cycles.
Listed Investments - International Shares	Long Term 6+ Years	To provide a diverse range of listed investment options that offer varied strategies aiming to achieve higher returns than fixed interest and property through the investment cycles from a variety of international listed companies. The higher return potential comes with higher short-term volatility of returns.
Property Funds <sup>6</sup>	Long Term 7+ Years	To provide a diverse range of Australian and international property investment options that offer varied investment styles aiming to achieve a higher return than cash and fixed interest securities through the investment cycles by investment in a variety of Australian and international property trusts. The higher return potential comes with higher short-term volatility of returns.

1 Includes hedge funds, private equity, managed futures and multi asset funds.

2 Includes Australian Government, semi Government, corporate, inflation-linked, mortgage securities and high-yielding securities.

3 Includes foreign Government, semi Government, corporate, inflation-linked, mortgage securities and high-yielding securities.

4 Includes large, mid and small caps.

5 Includes large unhedged and large hedged global shares, small caps and regional shares.

6 Includes both Australian and global property exposures.

## Appropriateness of the target market

This product should be consistent with the likely objectives, financial situation and needs of the class of clients in the target market who are seeking the attributes described above. Shadforth Portfolio Service - Investment fulfils a need for clients who are looking for a comprehensive IDPS solution that offers an extensive range of investments to help construct a unique portfolio.

The Shadforth Portfolio Service - Investment TMD will be reviewed as specified below to ensure it continues to be suitable for clients in the target market.

## Distribution Channels

This product can be distributed only via a financial adviser within the Shadforth Financial Group.



Financial Adviser

## Distribution Conditions

This product should only be distributed via an application form where the client meets all eligibility criteria.

## Appropriateness of distribution conditions

The distribution conditions and restrictions will make it likely that clients who purchase the product are in the class of clients for which the Shadforth Portfolio Service - Investment has been designed given the distribution conditions and restrictions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

## Review Period and triggers

Review period	Maximum period for review
Issue date	30 September 2024
Version	5
Periodic review	This TMD will be reviewed at least annually and will be updated as and when appropriate.

  

Review triggers	
	<p>The following events and circumstances would reasonably suggest the TMD should be reviewed to determine if it is no longer appropriate:</p> <ul style="list-style-type: none"> <li>• material changes to key product attributes and the terms and conditions of the product</li> <li>• significant dealing outside the TMD</li> <li>• material or unexpectedly high number of complaints about the product</li> <li>• the use of 'product intervention powers', regulator orders or directions that affect the product</li> <li>• regulatory changes that have a significant impact on the attributes of the product</li> <li>• significant number of clients exiting the product</li> </ul>

## Distributor Reporting

### Significant Dealings Reporting

Distributors are required to notify the issuer if they become aware of a significant dealing in the product that is not consistent with the TMD.

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.

Dealings outside this TMD may be significant because:

- 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 client (or class of client).

In each case, the distributor should have regard to:

- the actual or potential harm to a client,
- the nature and extent of the inconsistency of distribution with the TMD (including an explanation of why the dealings occurred outside the target market),
- the date range of when the significant dealing occurred,
- the number of clients impacted by the significant dealing (i.e. the number of clients who are not in the target market (or who have been excluded from the target market) as a proportion of all clients who have acquired the product), and
- the time period in which these acquisitions outside the target market occurred.

The reporting period is as soon as practicable but no later than 10 business days after becoming aware of the significant dealing.

### Complaints

The distributor will provide details of the number and nature of complaints relating to product design, product availability and distribution, having regard to privacy.

The distributor should provide details as soon as practicable but no later than 10 business days following the end of the calendar quarter.

### Contact details for distributors

Contact details and reporting instructions are available at [ddo.ioof.com.au](http://ddo.ioof.com.au)

You can also email us at [ddo@insigniafinancial.com.au](mailto:ddo@insigniafinancial.com.au) using the FSC standard template.

The information in this TMD is of a general nature only and has been prepared without taking into account a investor's objectives, financial situation or needs. Before making a decision based on this information, you should consider the appropriateness of the information, having regard to your objectives, financial situation and needs. NAL is an entity within the Insignia Financial Group of companies comprising Insignia Financial Ltd (ABN 49 100 103 722) and its related bodies corporate (Insignia Financial Group). An investment with NAL is subject to investment risk, including possible delays in repayment and loss of income and principal invested. Past performance is not an indication of future performance. The repayment of capital, the performance or any rate of return of an investment with NAL is not guaranteed by any member of the Insignia Financial Group or any other related or associated company.