# Target Market Determination

## Fiducian Australian Smaller Company Shares Fund

This TMD sets out the key attributes of the Product, the likely class of consumers for which the Product could be appropriate, the distribution conditions and restrictions, and outlines the triggers for review of the target market. It forms part of the requirements of the Design and Distribution Obligations (**DDO**) for Issuers, required under section 994B of the Corporations Act 2001 (Cth) (**the Act**).

This document is not a comprehensive summary of the Product's features and does not take into account your individual objectives, financial situation and needs. You should carefully read the Product Disclosure Statement for this Product and we recommend that you seek financial planning advice, and consider whether this investment is appropriate to your objectives, financial situation and needs before making any investment decision.

## How to read the TMD

This TMD uses Consumer Attributes to indicate the likely objectives, financial situation and needs of the class of consumers within this Product's target market. A colour grading system is used to indicate whether consumers with the identified Consumer Attributes will likely fit in the target market.

Consumers are unlikely to be within the target market for this product if:

- one or more of their Consumer Attributes are ;
  or
- three or more of their Consumer Attributes are

## Target Market Grading Key

| Likely in the Target Market | Potentially in the Target Market | Likely outside of the Target Market |
|---|---|---|

## Investment Products and Diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (typically with an intended product use of satellite/small allocation or core component). 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 conservative portfolio with a satellite/small allocation to growth assets. In this case, it may be likely that a product with a High or Very High risk/return profile is consistent with the consumer's objectives for that allocation notwithstanding that the risk/return profile of the consumer as a whole is Low or Medium. In making this assessment, distributors should consider all features of a product (including its key attributes).

## Product Summary

| | | | |
|---|---|---|---|
| **Fund Name** | Fiducian Australian Smaller Company Shares Fund (**Fund**, **Product**) | **Issuer** | Fiducian Investment Management Services Limited (**FIMS**) |
| **ASRN** | 093 542 020 | **ABN** | 28 602 441 814 |
| **APIR Code** | FPS0008AU | **AFSL** | 468211 |
| **Date Approved** | 30 June 2026 | **TMD Version** | 1.6 |
| **Distribution Channels** | Investment and Superannuation Platforms.<br>Direct Investment, subject to assessment by Fiducian.<br>Preferably by consumers who have received professional financial advice. | | |

The Fiducian Australian Smaller Company Shares Fund is a specialist fund. The Fiducian Investment Team make active tactical tilts between different fund manager styles and disciplines within the specialist funds. These decisions are the culmination of strategic decisions taken by the Investment Team on the basis of detailed economic, market and fund performance analysis. The Fund invests in a portfolio of Australian smaller company shares managed by a diversified group of specialist Australian smaller company fund managers. Smaller companies can more readily offer diversification across a number of industries than larger companies. They also tend to perform differently at different stages of the business cycle than larger companies. This fund will be distributed through investment and superannuation platforms. Financial advisers may distribute this product as a consequence of the Fund appearing on a platform.

## Appropriateness

The Issuer has assessed the Product, its key attributes and its distribution conditions and has formed the view that the distribution conditions of this product are appropriate and will likely reach the class of consumers intended as the preferred model of distribution is through financial advisers giving advice to the product's target market.

The Product is likely to be consistent with the likely objectives, financial situation and needs of the consumers in the target market described in this TMD.

| Product Features / Key Attributes | Consumer Attributes | Target Market Indication |
|---|---|---|
| Investment Objective | | |
| The objective of the Fund is to exceed the benchmark (after fees) over rolling 9-year periods. The relevant market index is the S&P/ASX Small Ordinaries Accumulation Index.<br>The Fund invests in a portfolio of Australian smaller company shares managed by a diversified group of specialist Australian smaller company fund managers. Investments are in smaller companies listed on the Australian Stock Exchange, which are generally defined to be companies other than those in the top 100 companies by market capitalisation. Smaller companies are often more flexible with less bureaucratic management. This may allow them to respond to market opportunities more quickly and to deliver higher growth than larger company shares over the longer term. However, smaller company shares tend to be more volatile in their performance and may also be difficult to buy and sell from time to time. | Capital Growth | |
| | Income | |
| | Capital Preservation | |
| | Capital Guaranteed | |
| | Specialist Fund | |
| Investment Timeframe | | |
| The Fund is suitable for investors who are prepared to hold their investment, individually or in combination with other asset sectors, for at least 9 years. Share investment can be volatile over the short-term. | Short (≤ 3 years) | |
| | Medium (3 – 7 years) | |
| | Long (> 7 years) | |
| Product Use | | |
| The Fund is a specialist fund. The Fund invests in a portfolio of Australian smaller company shares managed by a diversified group of specialist Australian smaller company fund managers. This fund will be distributed through investment and superannuation platforms. Financial advisers may distribute this product as a consequence of the Fund appearing on a platform. | Solution / Standalone (75% - 100%) | |
| | Core Component (25% - 75%) | |
| | Satellite / small allocation (<25%) | |

## Risk Level

The Fund has a **Very high** risk label (based on an estimate of 6 or greater negative annual returns in any 20-year period).

| | |
|---|---|
| Very low (Band 1) | |
| Low (Band 2) | |
| Low to Medium (Band 3) | |
| Medium (Band 4) | |
| Medium to High (Band 5) | |
| High (Band 6) | |
| Very high (Band 7) | |

## Asset Classes / Diversification

The Fund has an asset allocation range as noted below.

| | Benchmark Asset Allocation Range | Benchmark Asset Allocation |
|---|---|---|
| Australian Shares | 90% - 100% | 98% |
| Cash | 0% - 10% | 2% |

| | |
|---|---|
| Australian shares | |
| International shares | |
| Property | |
| Fixed interest | |
| Cash | |

## Redemption Frequency

Under ordinary circumstances where the Issuer is typically able to meet redemption requests within 10 working days, an investor can redeem from the fund daily by providing a redemption request to the relevant Service in accordance with their procedures or directly to Fiducian for direct investors.

However, note that smaller company shares may be difficult to buy and sell from time to time.

| | |
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| Low redemption frequency | |
| Medium redemption frequency | |
| High redemption frequency | |

## Why is the Fund likely to be consistent with the likely objectives, financial situation and needs of consumers

This Product is **likely** to be appropriate for an investor seeking to invest in Australian smaller company shares, with the aim of high returns over long periods of time. The Product is also **likely** to be appropriate for investors with a high risk tolerance and are prepared to hold their investment for at least 9 years, aiming for longer-term returns with money that is not required for cash flow at short notice. This is supported through the long-term returns achieved by the Fund.

This Product is **unlikely** to be appropriate for an investor seeking short-term growth, a low- or medium-risk profile, or investment in international assets.

This Product is **likely** to be appropriate for an investor who has a low- or medium-risk profile when used as a satellite with other defensive asset sectors

| Distribution Conditions and Restrictions | |
|---|---|
| Distribution Conditions / Restrictions | Distribution Channels |
| The Product will be available to consumers on select Fiducian-approved platform services, with product-specific content on Fiducian's website to help customers identify whether they are likely to be in the target market for this particular product.<br>Fiducian's approved platform services will display the product under the appropriate Consumer Attributes for this product's target market.<br>Direct applications to Fiducian will be assessed on a case-by-case basis. | Investment Platform<br>Superannuation Platform<br>Direct investment subject to Fiducian's approval<br>Consumers who have received personal financial advice from a professional financial adviser. |
| Why are these conditions/restrictions appropriate? | |
| The Fund will be delivered to platforms that encourage the use of financial advisers who will be able to consider the high gains and losses associated with the Fund and the best interests of Consumers who will invest in the Fund. | |

| Mandatory Review Periods | |
|---|---|
| Review period | Maximum period for review |
| Annual review | Approx. 1 year from the date of this TMD version |

| Review Periods | |
|---|---|
| Review Period | Review Triggers |
| This TMD is subject to a review at least annually or sooner if any of the Review Triggers occur or arising through regulatory requirements. | Material change to the product's features, including its key attributes.<br>Material change to the product's objective, benchmark, liquidity or performance over a significant period of time.<br>The Issuer has determined that an ASIC reportable 'significant dealing' has occurred.<br>Material number of complaints (as defined in section 994A(1) of the Act) about the product or its distribution.<br>The use of Product Intervention Powers, regulator orders or directions that materially affects the product. |

| Distribution Reporting Requirements | | |
|---|---|---|
| Reporting Requirements | Reporting Period | Who this applies to |
| A significant dealing that is not consistent with the TMD, including dealings in breach of the distributor conditions or outside the target market. Notify the Trustee in writing. | As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing. | All distributors |
| Complaints (as defined in section 994A(1) of the Act) relating to the product design, product availability and distribution. The following information is to be provided to the Trustee for each complaint:<br>(a) What is the complaint and the consumer's expected outcomes from the complaint<br>(b) Factual circumstances of the complaint<br>(c) The Consumer's status in the target market<br>(d) The Consumer's investment objective, investment timeframe and risk tolerance<br>(e) Any outcomes to the complaint | Within 10 business days following end of each quarter. | All distributors |

Distributors may report to the Fiducian by sending their report to TMDReporting@fiducian.com.au or through recognised software providers (eg iress).

## Definitions

| Term | Definition |
|---|---|
| Investment objective | |
| Capital Growth | The product is designed to generate capital return from the growth of the value of the underlying assets over time. The product provides material exposure to growth assets or otherwise seeks an investment return above the current inflation rate. |
| Income | The product is designed to generate a positive yield in order to distribute regular investment income to investors. The product provides material exposure to income-generating assets (typically, high dividend-yielding equities, fixed income securities and money market instruments). The product may also seek long-term capital growth and be labelled with a 'total return' (or similar) strategy and objective. |
| Capital Preservation | The product is designed to preserve capital and limit loss in the portfolio. The product provides material exposure to defensive assets and seeks to reduce volatility and minimise loss in a market down-turn. |
| Capital Guaranteed | The product is designed to seek a guarantee or protection against capital loss whilst still seeking the potential for capital growth (typically gained through a derivative arrangement). The product would normally invest in products that are capital guaranteed investments, term deposits and cash, where future performance is not guaranteed other than that it not be negative. |
| Specialist (Sustainable / Ethical / Sharia / ESG) | These are funds that have a specific investment style and specialisation, such as ESG, Sharia etc. |

| Consumer's intended product use (% of Investable Assets) | |
|---|---|
| Solution/Standalone (75-100%) | The consumer intends to hold the investment as either a part or the majority (up to 100%) of their total investable assets (see definition below). The consumer typically prefers exposure to a product with at least High portfolio diversification (see definitions below). |
| Core Component (25-75%) | The consumer intends to hold the investment as a major component, up to 75%, of their total investable assets (see definition below). The consumer typically prefers exposure to a product with at least Medium portfolio diversification (see definitions below). |
| Satellite (<25%) | The consumer intends to hold the investment as a smaller part of their total portfolio, as an indication it would be suitable for up to 25% of the total investable assets (see definition below). The consumer is likely to be comfortable with exposure to a product with Low portfolio diversification (see definitions below). |
| Investable Assets | Those assets that the investor has available for investment, excluding the residential home. |

| Portfolio diversification (for completing the key product attribute section of consumer's intended product use) | |
|---|---|
| Low | Single asset class, single country, low or moderate holdings of securities - e.g. high conviction Aussie equities. |
| Medium | 1-2 asset classes, single country, broad exposure within asset class, e.g. Aussie equities "All Ords". |
| High | Highly diversified across either asset classes, countries or investment managers, e.g. Australian multi-manager balanced fund or global multi-asset product (or global equities). |

| Consumer's intended investment timeframe | |
|---|---|
| Short (≤ 3 years) | The consumer has a short investment timeframe and may wish to redeem within three years. |
| Medium (3 - 7 years) | The consumer has a medium investment timeframe and may wish to redeem within three to seven years. |
| Long (> 7 years) | The consumer has a long investment timeframe and is unlikely to redeem within seven years. |

| Risk and Return | |
|---|---|
| Very high risk | Consumer has a more aggressive or very high risk appetite, wishing to maximise returns and willing to accept higher potential losses (e.g. 6 or more negative annual returns over a 20 year period or SRM 7) and possibly other risk factors, such as leverage, that could increase returns, as well as the size and magnitude of losses. |
| High risk | Consumer will be higher risk in nature, willing to accept higher potential losses (e.g. 4 to less than 6 negative annual returns over a 20 year period or SRM 6) in order to target a higher target return profile. |
| Medium to high risk | Consumer will be higher risk in nature, willing to accept higher potential losses (e.g. 3 to less than 4 negative annual returns over a 20 year period or SRM 5) in order to target a higher target return profile. |
| Medium risk | Consumer will be moderate or medium risk in nature, wishing to minimise potential losses (e.g. 2 to less than 3 negative annual returns over a 20 year period or SRM 4) and comfortable with a moderate target return profile. |
| Low to medium risk | Consumer will be conservative or low risk in nature, wishing to minimise potential losses (e.g. less than 1 negative annual returns over a 20 year period or SRM 3) and comfortable with a low to moderate target return profile. |
| Low risk | Consumer will be conservative or low risk in nature, wishing to minimise potential losses (e.g. 0.5 to less than 1 negative annual returns over a 20 year period or SRM 2) and comfortable with a low target return profile. |
| Very Low risk | Consumer will be conservative or low risk in nature, wishing to minimise potential losses (e.g. less than 0.5 negative annual returns over a 20 year period or SRM 1) and comfortable with a very low target return profile. |

| Consumer's need to withdraw money | |
|---|---|
| Low, Medium or High | The consumer seeks to invest in a product which permits redemption requests at various frequencies under ordinary circumstances and the issuer is typically able to meet that request within a reasonable period. |

| Review and Distribution | |
|---|---|
| Significant Dealing | Dealings outside this TMD may be significant because:<br>(a) It is inconsistent with the distribution strategy of this product, and/or<br>(b) It may result in transactions that cause actual or potential harm to consumers (or a class of consumer).<br>In each case, the distributor should have regard to:<br>(a) the benefits and risks disclosed by each investment product,<br>(b) the actual or potential harm to a consumer in an investment that is made outside the TMD, and<br>(c) an assessment of consumer investment across their portfolio, as determined by the number of green, yellow and red ratings.<br>Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if, when arranging investment products in the Service on behalf of a consumer, that there are more red ratings within the portfolio as compared with yellow and green ratings. |