La Trobe financial

# Target Market Determination
## 90 Day Notice Account

**Issue Date: 26 October 2026**

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**Act**). It describes the class of consumers that comprises the target market for the Fund Product and matters relevant to the Fund Product's distribution and review (specifically, distribution conditions, triggers to review the target market and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the Fund Product being consistent with the most recent TMD (unless the distribution is excluded conduct). It forms part of the Issuer's design and distribution arrangements for the Fund Product.

This document is not a product disclosure statement, and is not a summary of the product features or terms of the Fund Product. This document does not take into account any person's individual objectives, financial situation or needs. Consumers interested in acquiring this Fund Product should carefully read the Product Disclosure Statement (**PDS**) for the La Trobe Australian Credit Fund (**Fund**) before deciding whether to acquire this Fund Product.

## 1. Product and Issuer Description

| | |
|---|---|
| **Fund Product** | La Trobe Australian Credit Fund – 90 Day Notice Account |
| **Issuer** | La Trobe Financial Asset Management Limited AFSL 222213, ABN 27 007 332 363 |
| **Fund Manager** | La Trobe Financial Services Pty Limited ABN 30 006 479 527 |
| **Fund ARSN** | 088 178 321 |
| **APIR Code** | LTC9067AU |
| **TMD Version** | 10.0 |

## 2. Description of Target Market for the Fund Product

The Consumer Attributes column in the table below indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering this Fund Product.

| Category | Consumer Attributes |
|---|---|
| **Consumer's Investment Objective** | The consumer seeks an investment which offers the following:<br>• monthly interest income based on a variable rate of return (determined monthly);<br>• interest income to be paid monthly or reinvested at their direction;<br>• low volatility of returns;<br>• access to predominantly loans secured by first mortgages with an emphasis on diversification across asset location and sectors within Australia; and<br>• exposures to investments with a range of additional asset types – cash, term deposits, bank bills, bonds issued by a State or Federal Government or an Australian financial institution, negotiable certificates of deposit and credit instruments. |
| **Consumer Risk (ability to bear loss) and Return Profile** | The consumer:<br>• can accept no guarantee of the return of their capital or that interest payments will be paid;<br>• can accept variable rates of return which may be less than the rate of return disclosed on the Issuer's website;<br>• can accept returns that depend on the performance of the underlying loan portfolio; and<br>• is willing to accept the risk that the consumer may not be able to access their capital at the end of the 90 days' notice period.<br>For further details, see Consumer Risk and Return Profile in Section 3, page 3. |
| **Consumer Financial Situation** | • The consumer has sufficient funds to invest the minimum investment amount of $1 consistent with the consumer's intended product use (see below). |
| **Consumer's Investment Timeframe** | • The consumer has an investment timeframe of at least 90 days from the date of receipt by the Issuer of the consumer's investment (minimum notice requirement). |
| **Consumer's Need to Access Capital** | • The consumer accepts that access to their capital is possible, in normal operating conditions, after giving 90 days' notice (but up to 12 months in accordance with the Constitution of the Fund), and in other conditions, the Issuer may suspend withdrawals where the Issuer is reasonably of the view that it is necessary to do so in order for it to comply with its obligations under the Law.<br>• The consumer accepts that it must comply with the notice requirements for withdrawal (refer to the PDS). |

| Category | Consumer Attributes |
|---|---|
| **Consumer's Intended Product Use (% of Investable Assets[1])** | |

| | |
|---|---|
| Solution/Standalone (up to 100%) | Not in target market |
| Major allocation (up to 75%) | Not in target market |
| Core Component (up to 50%) | Not in target market |
| Minor allocation (up to 25%) | In target market |
| Satellite/Small allocation (up to 10%) | In target market |

**Solution/Standalone**

The consumer may hold the investment as up to 100% of their total investable assets[1]. The consumer is likely to seek a product with very high portfolio diversification[2]. The consumer is likely to seek a product with an indicative risk level of very low risk[3]. The consumer typically prefers stable assets (for example, cash). The consumer will not be willing to invest in a product such as the Fund Product which by its nature is a long term investment, where the consumer may not be able to access their money at maturity due to the liquidity of the Fund Product and may not receive the monthly income payments disclosed in the PDS and on the Issuer's website.

**Major allocation**

The consumer may hold the investment as up to 75% of their total investable assets[1]. The consumer is likely to seek a product with at least high portfolio diversification[2]. The consumer is likely to seek a product with an indicative risk level of very low risk[3]. The consumer typically prefers stable, defensive assets (for example, cash and term deposits). The consumer will not be willing to invest in a product such as the Fund Product which by its nature is a long term investment, where the consumer may not be able to access their money at maturity due to the liquidity of the Fund Product and may not receive the monthly income payments disclosed in the PDS and on the Issuer's website.

**Core Component**

The consumer may hold the investment as up to 50% of their total investable assets[1]. The consumer is likely to seek a product with at least medium portfolio diversification[2]. The consumer is likely to seek a product with an indicative risk level of low risk[3]. The consumer typically prefers defensive assets (for example, a fund product which offers exposure to a mix of cash and fixed income). The consumer will not be willing to invest in a product such as the Fund Product which by its nature is a long term investment, where the consumer may not be able to access their money at maturity due to the liquidity of the Fund Product and may not receive the monthly income payments disclosed in the PDS and on the Issuer's website.

**Minor allocation**

The consumer may hold the investment as up to 25% of their total investable assets[1]. The consumer is likely to seek a product with at least low portfolio diversification and in some instances up to medium portfolio diversification[2]. The consumer is likely to seek a product with an indicative risk level of up to medium risk[3] and in certain cases medium to high risk[3] or high risk[3]. The consumer typically prefers defensive assets (for example, fixed income fund products) and in certain cases high growth assets (such as shares and property). The consumer may be willing to invest in a product such as the Fund Product which by its nature is a long term investment, where the consumer may not be able to access their money at maturity due to the liquidity of the Fund Product and may not receive the monthly income payments disclosed in the PDS and on the Issuer's website.

**Satellite/Small allocation**

The consumer may hold the investment as up to 10% of their total investable assets[1]. The consumer may seek a product with very low portfolio diversification and in some instances up to low or medium portfolio diversification[2]. Products with an indicative risk level of high risk[3] to very high risk[3] are likely to meet this category only. The consumer typically prefers high growth assets (such as a mix of shares, property, high conviction portfolios, hedge funds, and alternative investments). The consumer may be willing to invest in a product such as the Fund Product which by its nature is a long term investment, where the consumer may not be able to access their money at maturity due to the liquidity of the Fund Product and may not receive the monthly income payments disclosed in the PDS and on the Issuer's website.

| | |
|---|---|
| **Consumers for whom the Fund Product may be unsuitable** | This Fund Product may not be suitable for consumers who:<br>• have an intended product use indicated as 'Not in target market' above;<br>• are seeking a capital guaranteed investment or who do not have the ability to bear any capital loss;<br>• require capital growth;<br>• require a fixed rate of return on their investment;<br>• want to invest in a bank deposit or a term deposit with a bank or benefit from Australian Government's deposit guarantee scheme (the Financial Claims Scheme); and<br>• are seeking access to some or all of their funds upon request. |

## 3. Consistency of Fund Product's features with consumer key attributes of the Target Market

| Category | Product Description including key attributes of the Target Market |
|---|---|
| **Consumer's Investment Objective** | The Fund Product:<br>• aims to pay monthly interest income based on a variable rate of return (determined monthly);<br>• provides consumers with a choice of how interest income can be received, either:<br>– directly credited to a bank account nominated by the consumer generally within 14 days after the end of each month; or<br>– reinvestment of interest into the Fund Product, 90 Day Notice Account, 6 Month Notice Account, the 12 Month Investment Account or 2 Year Investment Account (provided the consumer has an existing investment in the 12 Month Investment Account or 2 Year Investment Account);<br>• aims to provide investors with a reasonably stable and predictable income;<br>• is invested predominately in loans secured by first mortgages; and<br>• also has an allocation of investments in a range of asset types which may include cash, term deposits, bank bills, bonds issued by a State or Federal Government or an Australian financial institution, negotiable certificates of deposit and credit instruments. |
| **Consumer Risk (ability to bear loss) and Return Profile** | The Issuer considers that the portfolio holdings of diversified first mortgages and an allocation to cash and deposits is supportive of ongoing, monthly income characterised by low volatility of returns.<br>The Issuer considers the Fund Product:<br>• has an indicative risk level of Low-Medium[3];<br>• does not guarantee the return of capital after giving 90 days' notice or thereafter (in full or in part);<br>• does not guarantee that interest payments will be paid to consumers;<br>• may provide variable rates of return which are less than the rate of return disclosed on the Issuer's website;<br>• has a risk profile that depends on the performance of the underlying investments;<br>• has medium portfolio diversification (see Section 2 above); and<br>• may lead consumers to lose some of their invested capital.<br>For more detailed explanation of the risks that apply to the Fund Product, please refer to section 9 of the PDS. |
| **Consumer's Financial Situation** | The Fund Product has a minimum investment amount of $1. |
| **Consumer's Investment Timeframe** | The Fund Product has a minimum investment timeframe of at least 90 days from the date of receipt by the Issuer of the consumer's investment.<br>The Issuer will make every endeavour to release investor funds 90 days after receiving the consumer's request however the Issuer has 12 months under the Fund's Constitution to honour that request. The Issuer has the right to suspend withdrawals where the Issuer is reasonably of the view that it is necessary to do so in order for it to comply with its obligations under the Law. |
| **Consumer's need to access capital** | The Issuer will make every endeavour to make withdrawal payments 90 days from the date of receipt of the withdrawal notice. Where the notice period ends on a weekend or public holiday, the payment will be made on the next business day. Such payments are all subject to availability of cash in the Fund and the Fund being liquid. Different processing and distribution timeframes apply where the Fund Product is held on investment platforms (refer to section 6 of the PDS).<br>The Fund Product does not provide the consumer with the right of early withdrawal of some or all of their funds invested in the Fund Product. |
| **Consumer's Intended Product Use** | The Issuer considers the Fund Product has medium diversification (see Section 2 above). |
| **Consumers for whom the Fund Product may be unsuitable** | The Fund Product:<br>• does not guarantee any investment result, the return of capital, interest payments to consumers or liquidity;<br>• pays a variable rate of return; and<br>• is not a bank deposit or a term deposit, and is not covered by the Australian Government's deposit guarantee scheme (the Financial Claims Scheme). |

## 4. Distribution conditions/restrictions

| Distributors this condition applies to | Distribution Conditions | Distribution condition rationale |
|---|---|---|
| **Issuer – Direct to Consumer** | **Personal Advice or Questionnaire**<br>Consumers applying to invest in the Fund Product either:<br>1. have received personal financial advice to acquire the Fund Product; or<br>2. are required to complete a questionnaire, to assist the Issuer to determine whether it is likely that the consumer falls within the target market. | **Personal Advice**<br>This distribution condition is likely to result in distribution to consumers who are likely to be in the target market because persons providing personal financial product advice to acquire the Fund Product must consider the consumer's individual circumstances and comply with the best interests duty and related obligations under Pt 7.7A of the Act.<br>**Application Questionnaire**<br>This distribution condition will make it likely that the Issuer can identify if the Fund Product is being effectively distributed within the target market.<br>Further it assists the Issuer to identify where a consumer is likely not within the target market and where a risk of harm could exist.<br>This distribution condition will make it more likely that the Issuer's staff or Authorised Representatives will identify if a consumer is not within the target market. |
| | **Training of Sales & Distribution Staff**<br>The Issuer's distribution, sales staff and Authorised Representatives of the Issuer are required to be properly trained in:<br>• the DDO regime and undergo at least annual training; and<br>• the terms of the TMD. | **Training of Sales & Distribution Staff**<br>This distribution condition will make it more likely that the Issuer's staff or Authorised Representatives will identify if a consumer is not within the target market. |
| | **Marketing, Advertising & Promotion**<br>No Fund Product marketing, advertising or promotional materials may be sent or made available by the Issuer unless the Issuer has completed an external communications compliance checklist. | **Marketing, Advertising & Promotion**<br>The Issuer has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because distributors using this promotional material will not be promoting the Fund Product in a way that could misrepresent the Fund Product or likely direct marketing to potential consumers outside the target market. |
| **Third-Party Distribution (including Investment Platforms)** | **Legal Obligations**<br>All third-party distributors must meet all ongoing regulatory and disclosure obligations relating to their position in the market.<br>Financial advisers are also required to hold an Australian Financial Services License or maintain an appointment as a representative authorised to engage in activities on behalf of a financial services licensee as part of the Issuer's accreditation requirements. | **Legal Obligations**<br>In relation to Investment Platforms and financial advisers, the Issuer has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because:<br>• the issuer of each platform or approved product has its own obligations as a distributor to take reasonable steps that will or are reasonably likely to result in retail product distribution conduct being consistent with this TMD;<br>• the Issuer has an arrangement with each platform provider governing their relationship noting that platform providers, as distributors, are required to take reasonable steps that will, or are likely to, result in distribution of the Fund Product being consistent with its TMD;<br>• where investments are issued in accordance with personal financial product advice, the third party's standard advice documentation process (i.e. the provision of a statement of advice to the consumer) will be followed; and<br>• where investments are not issued in accordance with personal financial product advice, the platform provider may require clients to answer filtering questions related to this TMD.<br>*Continued next page.* |

| Distributors this condition applies to | Distribution Conditions | Distribution condition rationale |
|---|---|---|
| **Third-Party Distribution (including Investment Platforms)**<br>*Continued from previous page.* | **Marketing, Advertising & Promotion**<br>Third-party distributors may not use marketing, advertising or promotional materials that are inconsistent with the Issuer's issued materials. | **Marketing, Advertising & Promotion**<br>The Issuer has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because distributors using promotional material will not be promoting the Fund Product in a way that could misrepresent the Fund Product or likely direct marketing to potential consumers outside the target market. |
| | **Distribution Agreement**<br>Where a third-party distributor has entered into a distribution agreement with the Issuer, each third-party distributor must meet on an ongoing basis the Issuer's accreditation requirements and referrers, investment platforms and authorised representatives must comply with their respective distribution agreement with the Issuer. | **Distribution Agreement**<br>The Issuer has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because requiring distributors to comply with relevant conditions of distribution aims to reinforce to the distributor that the Issuer is committed to its compliance with the DDO regime. |

## 5. Reviewing this TMD

This TMD will be reviewed on:

- a scheduled basis with reviews to be completed before the end of the maximum period for review specified below; and
- where a Review Trigger (as defined below) has occurred.

### Mandatory TMD review periods

| Reporting requirements | Maximum period for review |
|---|---|
| Initial review | Not applicable. |
| Subsequent Review | 18 September 2027. |

### Review Triggers

The events and circumstances described below (**Review Triggers**) will also require a review of this TMD:

- material change to the terms or attributes of the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- where and when the Fund Product is not being distributed and purchased as envisaged by this TMD which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- an event or circumstance that would materially change a factor considered in making the TMD for the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- reporting from distributors of one or more 'significant dealings', multiple distributors of 'significant dealing' (see section 6 below) in the Fund Product or numerous reports from one distributor of 'significant dealings' in the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- determination by the Issuer of a 'significant dealing' (see section 6 below) in the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the Fund Product or the distribution of the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- a reportable situation (as defined in section 912D of the Act) has been reported in relation to the design or distribution of the Fund Product and which the Issuer reasonably considers indicates that the TMD may no longer be appropriate;
- regulatory inquiry by AFCA, ASIC or another regulatory authority as to the design or distribution of the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate; and/or
- the use by ASIC or other regulators of Product Intervention Powers, regulatory orders or directions that affect the Fund Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate.

The above Review Triggers do not limit the Issuer's obligations under section 994C(3)(ii) of the Act. When a review trigger has occurred, this TMD will be reviewed within 10 business days.

## 6. Reporting and monitoring this TMD

The following reporting requirements apply to all distributors of the Fund Product:

| Reporting requirements | Reporting period |
|---|---|
| Where the distributor is aware or ought to reasonably be aware, it should report on each 'significant dealing' outside of the target market, under section 994F(6) of the Act (see guidance below) by completing the Notification of Significant Dealing Form and submitting it to: targetmarketdistribution@latrobefinancial.com.au. | As soon as practicable but no later than 10 business days after the distributor becomes aware of the 'significant dealing'. |
| Distributors must report to the Issuer (at targetmarketdistribution@latrobefinancial.com.au):<br>• if the distributor received complaints in relation to the Fund Product during the reporting period, the number of complaints it received; and<br>• include, with its report, a copy of each complaint (as defined in section 994A(1) of the Act) (to the extent permitted under privacy and other laws), or where this is not possible, report on the content of each complaint. | On a quarterly basis and for each quarter as soon as practicable but no later than 10 business days following the end of the quarter. |

Section 994F(6) of the Act requires distributors to notify the Issuer if they become aware of a significant dealing in the product that is not consistent with the TMD. Neither the Act nor ASIC defines when a dealing is 'significant' and distributors have discretion to apply its ordinary meaning.

The Issuer will rely on notifications of significant dealings to monitor and review the Fund 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 Fund Product; or
- they constitute an individual transaction which has resulted in, or will or is likely to result in, significant detriment to the consumer (or class of consumer).

In determining whether a 'significant dealing' has occurred, La Trobe Financial expects that the following non-exhaustive list of factors may be relevant for distributors:

- the nature and risk profile of the Fund Product;
- whether a consumer outside of the target market has acquired the Fund Product;
- the extent to which the acquisition of the Fund Product by the consumer outside of the target market has the potential to harm or has caused harm (including the amount of any financial loss); and/or
- the nature and extent to which the distribution of the Fund Product is inconsistent with the TMD.

The above list is not exhaustive and distributors should consider, having regard to the circumstances of their business, whether other factors or events may suggest that a significant dealing has occurred. A significant dealing may be identified through the distributor's product governance arrangements, as a result of a consumer complaint or the occurrence of a Review Trigger.

## 7. Contact Us

Please contact the Issuer at targetmarketdistribution@latrobefinancial.com.au with any questions or feedback with respect to this TMD.

Historical versions of this TMD and the Notice of Significant Dealing Form are available at https://latrobefinancial.com.au/investments/investment-solutions/tmd/.

## 8. Disclaimer

Issued by La Trobe Financial Asset Management Limited (AFSL 222213, ABN 27 007 332 363) (Issuer). The Issuer is the responsible entity and issuer of the Fund Product referred to in this TMD. This TMD provides general information only and does not take into account your individual objectives, financial situation, needs or circumstances. Before making any investment decision, you should assess whether the TMD is appropriate for you and obtain financial advice tailored to you having regard to your individual objectives, financial situation, needs and circumstances. This TMD is not a financial product recommendation or an offer or solicitation with respect to the purchase or sale of any financial product in any jurisdiction.

**Investable Assets**

1. Investable Assets means those assets that the consumer has available for investment, excluding the residential home and money needed for daily living expenses such as bills and mortgage repayments.

**Portfolio diversification**

2. **Very High:** The product provides exposure to a large number of holdings across a broad range of asset classes, sectors and geographic markets with limited correlation to each other.
   **High**: The product provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asset classes, sectors or geographic markets (for example, global equities).
   **Medium:** The product provides exposure to a moderate number of holdings (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).
   **Low:** The product provides exposure to a small number of holdings (for example, fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, a single major commodity (e.g. gold) or equities from a single emerging market economy).
   **Very Low:** The product provides exposure to a single asset (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).

**Indicative Risk Level**

3 The indicative risk levels disclosed in this TMD have been developed by reference to the Joint AFSA/FSC Guidance Paper on Standard Risk Measures which provides a seven-level risk classification system for financial products by reference to their risk of generating negative returns over a 20-year period, with indicative risk levels as follows:

| Risk Band | Risk Level | Estimated Number of Negative Annual Returns Over Any 20-Year Period |
|---|---|---|
| 1 | Very low | Less than 0.5 |
| 2 | Low | 0.5 to less than 1 |
| 3 | Low to medium | 1 to less than 2 |
| 4 | Medium | 2 to less than 3 |
| 5 | Medium to high | 3 to less than 4 |
| 6 | High | 4 to less than 6 |
| 7 | Very high | 6 or greater |

As the SRM is not a complete assessment of risk and potential loss, in determining a financial product's indicative risk level, La Trobe Financial supplements the SRM with an assessment of other risk factors including diversification, liquidity, asset selection and quality, qualitative risk characteristics (as provided for in the relevant PDS), market and economic factors and the views of regulators. La Trobe Financial will not attribute an indicative risk level to a product which is lower than that suggested by the SRM. However, having regard to its assessment of additional risk factors and through taking a conservative approach, La Trobe Financial may attribute a higher indicative risk level to a financial product than would be suggested by the SRM or its overall product risk assessment.