

FirstWrap Plus Pension and FirstWrap Plus Term Pension

Target Market Determination

30 September 2024

This Target Market Determination (TMD) is a publicly available document required under section 994B of the *Corporations Act 2001* (Cth). It sets out the class of consumers for whom the FirstWrap Plus Pension and FirstWrap Plus Term Pension (the product), including its key attributes, would likely be suitable given their likely objectives, financial situation and needs. It also contains triggers to review the TMD and certain other information. It forms part of the Colonial First State design and distribution framework for the product.

This document is not a Product Disclosure Statement (PDS) and is not a summary of the product features or terms of the product. This document does not take into account any person's individual objectives, financial situation or needs. Persons interested in acquiring this product should carefully read the PDS for **FirstWrap Plus Pension and FirstWrap Plus Term Pension**, available at firstwrap.com.au and consider obtaining financial advice before making a decision whether to acquire this product.

Product name

FirstWrap Plus Pension and FirstWrap Plus Term Pension

Product issuer

Avanteos Investments Limited (Trustee, we, us, or our)

Start date

30 September 2024

Product description

FirstWrap Plus Pension and FirstWrap Plus Term Pension are pension phase products which offers access to the following key features:

- Operated under a wrap product structure which provides members with transparency on transactional, custodial and reporting services within a single administration platform
- Allocated Pension, Transition to Retirement Pension, and Term Allocated Pension options

- The ability for an individual to flexibly and regularly drawdown on their superannuation savings in retirement
- A diverse range of investment options, including managed accounts, managed funds, Australian Securities Exchange (ASX) listed securities, term deposits and cash
- The ability to authorise a licensed financial adviser to the account to assist in managing and administering the account and investments on behalf of the customer.

Target market

FirstWrap Plus Pension and FirstWrap Plus Term Pension are suitable for individuals who wish to transfer from the accumulation (Super) version of the product or looking to invest in a pension with the following objectives, financial situation and needs:

- Are looking to access a diverse range of investment options, including managed accounts, managed funds, ASX listed securities, term deposits, and cash. Please refer to the FirstWrap Plus Investment List available at firstwrap.com.au for the full list of available investment options
- Wish to regularly review their investment portfolio via their financial adviser or through direct investor platform access and/or mobile application when it suits them
- Understand the drawdown rules of pension products whereby each pension account must withdraw at least the applicable minimum payment
- Have engaged a financial adviser to implement an investment strategy that suits their individual goals

and objectives by taking into account the likely return, the level of risk and investment timeframe

- Will provide authorisation for financial advisers to transact and manage their investments in the product
- Intend to invest an initial amount of at least \$20,000
- Are able to maintain a minimum balance in the cash account of the lower of \$3,000 or 1.0% of the total account balance, plus the value of any pension payments due over the next two months
- Are seeking to receive consolidated, detailed and transparent reporting for their investments
- Are looking to invest in one, or a combination of, investment options outlined in the Investment options section, where the member's risk, return and investment objectives align with those attributed to the investment options in the Investment options section.

This product is not designed for individuals who:

- Want to make contributions to this product after the pension product is established, or
- Have not met a condition of release, or
- Seek a guaranteed return of capital, or
- Are looking for default investment arrangements, or
- Want to have insurance cover on their account or linked to their account, or
- Expect to have less than \$20,000 to invest initially, or
- Do not have a financial adviser, or
- Are outside of Australia.

The PDS and Other Important Information brochure do not constitute an offer or invitation in any jurisdiction other than in Australia. Applications from outside Australia will not be accepted.

Investment options

This product provides access to a range of investment options with different investment objectives, levels of risk, exposure to different asset classes and investment timeframes. Different investment options have different levels of potential return and volatility which can be identified through the relevant investment categorisation below. Where applicable, investment options available through this product will have a separate TMD that should be considered in conjunction with this document.

Investment category	Investment objective ¹	Risk considerations ²	Standard Risk Measure ³	Minimum suggested investment timeframe ⁴
Cash and deposits	To earn returns that match headline CPI increases over rolling one-year periods.	• Term risk • Credit risk	Very low (1)	None
Enhanced cash	To earn a return exceeding the Bloomberg AusBond Bank Bill Index plus 0.5%–1% through portfolios investing predominantly in money market funds and some fixed interest securities.	• Term risk • Credit risk • Liquidity risk	Very low (1)	1 year
Australian fixed interest	To earn returns that exceed the Bloomberg AusBond Composite Bond Index (All Maturities) on average through portfolios investing predominantly in domestic fixed interest securities including government, corporate and structured investments.	• Term risk • Credit risk • Liquidity risk • ESG risk • Climate risk	Medium to High (5)	3 years

Investment category	Investment objective ¹	Risk considerations ²	Standard Risk Measure ³	Minimum suggested investment timeframe ⁴
Diversified fixed interest	To earn returns that exceed a global bond index such as Citigroup World Government Bond Index (hedged into \$A) or the Barclays Global Aggregate (hedged to \$A) through portfolios investing predominantly in global fixed interest securities (or a combination of global and domestic) including government, corporate and structured investments.	• Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • ESG risk • Climate risk	Medium to High (5)	3 years
Short duration fixed interest	To earn returns that exceed the Bloomberg AusBond Bank Bill Index plus 1–2% through portfolios investing predominantly in domestic and/or global fixed interest securities with an absolute return focus, lower risk and minimal duration, typically investing to a cash plus 1–2% target.	• Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • ESG risk • Climate risk	Medium to High (5)	3 years
Alternative income	To earn returns that exceed the Bloomberg AusBond Bank Bill Index plus 2–5% on average through portfolios looking to generate a higher level of income, predominantly through investment in domestic and/or global fixed interest securities but also through certain income producing equities and alternatives, typically with an absolute return target with higher risk and expected return than Short duration fixed interest.	• Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • ESG risk • Climate risk	Medium to High (5)	3 years
Defensive	To earn returns that exceed an appropriate benchmark return through the allocation of 80–100% of funds to defensive assets. Defensive assets such as cash and fixed interest provide relatively stable returns with lower risk of impact from market volatility.	• Equity risk • Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • ESG risk • Climate risk	Low to Medium (3)	3 years
Conservative	To earn returns that exceed an appropriate benchmark return through the allocation of 60–79% of funds to defensive assets. Defensive assets such as cash and fixed interest provide relatively stable returns with lower risk of impact from market volatility. The remaining assets are allocated to growth assets such as Australian and Global shares which aim to provide higher returns but have a higher risk of impact from short-term market fluctuations.	• Equity risk • Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • Derivatives risk • ESG risk • Climate risk	Medium (4)	3 years

Investment category	Investment objective ¹	Risk considerations ²	Standard Risk Measure ³	Minimum suggested investment timeframe ⁴
Moderate	To earn returns that exceed an appropriate benchmark return through a mixed allocation of 41–60% of funds to growth assets and the remaining funds to defensive assets. This portfolio seeks to earn greater returns through growth assets such as Australian and Global shares balanced against defensive assets such as cash and fixed interest.	• Equity risk • Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • Derivatives risk • ESG risk • Climate risk	Medium to High (5)	5 years
Growth	To earn returns that exceed an appropriate benchmark return through the allocation of 61–80% of funds to growth assets. The allocation will include a mix of Australian and Global shares and property and infrastructure assets which seek higher returns in the long term with greater risk. The remaining assets are allocated to defensive assets such as fixed interest and cash which provide relatively stable returns with lower risk of impact from market volatility.	• Equity risk • Small cap risk • Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • Derivatives risk • ESG risk • Climate risk	High (6)	5 years
High growth	To earn returns that exceed an appropriate benchmark return through the allocation of 81–100% of funds to growth assets. The allocation will include a mix of Australian and Global shares and property and infrastructure assets which seek higher returns in the long term with greater risk. The remaining assets are allocated to defensive assets such as fixed interest and cash which provide relatively stable returns with lower risk of impact from market volatility.	• Equity risk • Small cap risk • Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • Derivatives risk • ESG risk • Climate risk	High (6)	7 years
Diversified real return	To earn returns that exceed an appropriate benchmark return through portfolios with a flexible allocation to growth assets and typically with an absolute return target.	• Equity risk • Small cap risk • Emerging markets risk • Term risk • Credit risk • Liquidity risk • Currency risk • ESG risk • Climate risk • Valuation risk	High (6)	5 years
Australian share	To earn returns that exceed the S&P/ASX 300 Accumulation Index through investing predominantly in Australian shares.	• Equity risk • ESG risk • Climate risk	Very high (7)	7 years

Investment category	Investment objective ¹	Risk considerations ²	Standard Risk Measure ³	Minimum suggested investment timeframe ⁴
Australian share – small companies	To earn returns that exceed the S&P/ASX Small Ordinaries Accumulation Index through investing predominantly in Australian small companies.	• Equity risk • Small cap risk • Liquidity risk • ESG risk • Climate risk	Very high (7)	7 years
Global share	To earn returns that exceed the MSCI World ex-Australia Index through investing predominantly in global shares.	• Equity risk • Emerging markets risk • Currency risk • ESG risk • Climate risk	Very high (7)	7 years
Global share – emerging markets	To earn returns that exceed an emerging market global share index such as the MSCI Emerging Markets Index or the MSCI Asia ex-Japan Index through portfolios investing predominantly in emerging markets.	• Equity risk • Emerging markets risk • Liquidity risk • Currency risk • ESG risk • Climate risk	Very high (7)	7 years
Specialist share	To earn returns that exceed an appropriate sector component index through investing predominantly in specific sectors or regions, global small companies or long/short strategies.	• Equity risk • Small cap risk • Emerging markets risk • Liquidity risk • Short selling risk • Derivatives risk • Currency risk • ESG risk • Climate risk	Very high (7)	7 years
Lower volatility share	To earn returns that exceed the S&P/ASX 300 Accumulation Index or the MSCI World ex-Australia Index through portfolios predominantly managed with a low volatility objective relative to shares, using quantitative techniques, equities option overlays or variable allocations to cash.	• Equity risk • Currency risk • ESG risk • Climate risk	Very high (7)	7 years
Geared funds	To earn returns that exceed the S&P/ASX 300 Accumulation Index or the MSCI World ex-Australia Index through portfolios predominantly invested in Australian, global equities or other listed securities whilst using gearing.	• Equity risk • Gearing risk • Currency risk • ESG risk • Climate risk	Very high (7)	7 years
Australian property and infrastructure	To earn returns that exceed the S&P/ASX 300 A-REIT Index or an appropriate relevant infrastructure index through portfolios investing predominantly in Australian property and/or infrastructure.	• Equity risk • Currency risk • ESG risk • Climate risk • Valuation risk	Very high (7)	7 years

Investment category	Investment objective ¹	Risk considerations ²	Standard Risk Measure ³	Minimum suggested investment timeframe ⁴
Global property and infrastructure	To earn returns that exceed the FTSE EPRA/NAREIT Developed Index (hedged to \$A) or FTSE Global Core Infrastructure 50/50 Index (hedged to \$A) through portfolios investing predominantly into global property and/or infrastructure.	• Equity risk • Currency risk • ESG risk • Climate risk • Valuation risk	High to Very high (6 to 7)	7 years
Alternatives	To deliver consistent medium term returns on average with low correlation to broad equity and fixed income markets by investing in both traditional and non-traditional asset classes through portfolios including, but are not limited to, absolute return funds, diversified hedge funds, global macro funds, commodity trading and currency funds.	• Equity risk • Small cap risk • Credit risk • Liquidity risk • Currency risk • Short selling risk • Derivatives risk • Valuation risk	Medium to High, to Very high (5 to 7)	5 years
Listed Australian securities	To provide investors with a growth investment return from exposure to companies listed on the Australian Stock Exchange (ASX). This strategy may provide additional returns by investing in Australian companies who declare partially or fully franked dividends.	• Equity risk • Small cap risk • ESG risk • Climate risk	Very high (7)	7 years
Listed interest rate securities	To provide investors with a regular income stream above the cash rate over the short to medium term.	• Equity risk • ESG risk • Climate risk	Very high (7)	7 years

1 Refer to the 'Other Important Information' brochure for a detailed description of the investment objective for each individual investment option. Risk and return objectives for each investment option may vary from their associated investment category objective.

2 Refer to the FirstWrap Plus Super and Pension Product Update for further information on the various risk considerations associated with investments.

3 The standard risk measure is a 1–7 scale based on the estimated number of negative annual returns over any 20-year period. Refer to the 'Other Important Information' brochure for more information on the standard risk measures for each individual investment option.

4 The minimum suggested timeframe is an estimate of how long you should expect to hold your capital in an investment option within this category in order to achieve its expected investment return outcome.

Appropriateness of the target market

This product is likely to be consistent with the likely objectives, financial situation and needs of the class of customers in the target market as described above. This is based on an analysis of the key terms, features, and attributes of the product and a finding that these are consistent with the identified class of customers.

Distribution conditions and restrictions

Distribution conditions

This product can only be offered and/or issued in accordance with the relevant product terms and conditions outlined in the PDS (as amended from time to time).

This product can be distributed:

- Via **third party financial advisers** – In order to be distributed via this channel, the adviser must:
 - Be registered with us through a dealer group that has agreed with our Licensee terms, and
 - Have met our minimum criteria which include an array of internal and external checks, including the professional standards as outlined by the Australian Securities and Investments Commission (ASIC) or
- **Directly** – via an online application form or paper application form completed by existing members of the accumulation (Super) version of the product.

Appropriateness of the distribution conditions and restrictions

It has been determined that the distribution conditions and restrictions will make it likely that customers who purchase the product are in the class of customers for which it has been designed. We consider that the distribution conditions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

Review triggers

Where we determine that one of the below review triggers has occurred, we must undertake a review of this TMD:

- Receipt of a product intervention order from ASIC requiring us to cease retail distribution of this product or the issue of orders or directions by ASIC in relation to the distribution of this product
- Receipt of a significant or an unexpectedly high number of complaints from customers who have acquired this product, regarding the product design, features, availability and any distribution condition that would reasonably suggest that this TMD is no longer appropriate
- Occurrence of a significant dealing(s) outside of the TMD that would reasonably suggest that this TMD is no longer appropriate
- Material change to key product features, investment objectives or terms and conditions that would reasonably suggest that this TMD is no longer appropriate
- The target market and product attributes described in this TMD are found to include materially incorrect or misleading information that reasonably suggests that this TMD is no longer appropriate
- A significant number of investment options (excluding fixed term investments) have become illiquid and are no longer able to offer withdrawals (including investment switching), which reasonably suggests that this TMD is no longer appropriate
- The trustee of this product makes a determination for purposes of s52(9) of the *Superannuation Industry (Supervision) Act 1993* (Cth) (Member Outcomes Assessment – which includes, but is not limited to, the assessment of product performance against APRA Heatmap, investment risk and sustainability) that the financial interests of the customers who hold this product are not being promoted
- Changes to legislation have come into effect which materially impact upon the design or distribution of the product and reasonably suggests that this TMD is no longer appropriate.

Initial review date

N/A - initial review has already occurred

Subsequent review date

30 September 2025

Review trigger information requirements

Information	Provider	Reporting frequency	Method
Complaints The number, nature and outcomes of complaints received in relation to this product's design, features, availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	Distributor	Quarterly (within 10 business days following the end of the calendar quarter).	by emailing to complaints@cfs.com.au
Significant dealing outside the target market The nature and circumstances of the significant dealing (including why the dealings occurred outside the target market), the date range of when the significant dealing occurred, the number of consumers to whom the report relates, whether personal financial advice was provided (in writing) and whether consumer harm or detriment has or has likely occurred as a result of the significant dealing.	Distributor	As soon as practicable, but no later than 10 business days after the distributor becomes aware of the significant dealing.	Using FSC data standards (where possible) and submitting to wrapddo@cfs.com.au

Important information: Avanteos Investments Limited ABN 20 096 259 979, AFSL 245531 (AIL) is the trustee of the 'Avanteos Superannuation Trust' ABN 38 876 896 681 and issuer of FirstWrap Plus Super and Pension and FirstWrap Super and Pension (closed to new investors 28 March 2011). This document may include general advice but does not take into account your individual objectives, financial situation or needs. Because of this, before acting on the information, you should consider its appropriateness having regard to these factors. You should consider obtaining financial advice relevant to your personal circumstances before investing. You should read the relevant PDS and Financial Services Guide (FSG) carefully, assess whether the information is appropriate for you, and consider talking to a financial adviser before making an investment decision. The PDS and FSG can be obtained from your adviser, firstwrap.com.au, or by calling us on 1300 769 619. Investments in the funds are subject to investment risk, including loss of income and capital invested.

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