



Super Simplifier

Target Market Determination

For Super Simplifier (the Fund) a Division of the DIY Master Plan, Pension Product

Issued by Diversa Trustees Limited ABN 49 006 421 638, AFSL 235153, RSEL L0000635

1. About this document

This Target Market Determination (TMD) is required under section 994B of the Corporations Act 2001 (Cth) (the Act). It sets out the class of consumers for whom the product, including its key attributes, would likely be consistent with their likely objectives, financial situation and needs. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of Diversa Trustees Limited (ABN 49 006 421 638) (Trustee) design and distribution arrangements for the product.

This document is not a product disclosure statement 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 Product Disclosure Statement (PDS) for Super Simplifier before making a decision whether to buy this product.

Important terms used in this TMD are defined in the TMD Definitions which supplement this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained from your Financial Adviser or via www.supersimplifier.com.au

Product Disclosure Statement to which this target market determination applies

This TMD applies to the Super Simplifier referred to in the following Product Disclosure Statement, Member Guide and Application Form <https://supersimplifier.com.au/documents/>

Other documents to which this target market determination applies

This TMD applies to the Super Simplifier referred to in the following relevant documents:

- Super Simplifier Approved Product List in the PDS and Member Guide <https://supersimplifier.com.au/documents/>
- Super Simplifier Managed Funds Approved Product List <https://supersimplifier.com.au/documents/>

2. Important dates

Date from which this target market determination is effective	5 October 2021
Date when this target market determination was last reviewed	5 October 2021
Date when this target market determination will be next reviewed	1 November 2022

3. Class of consumers that fall within this target market

The information below summarises the overall class of consumers that fall within the target market for the Super Simplifier Pension Account.

The Super Simplifier Pension Account **is** designed for consumers who:

- have attained the age of 65 or are seeking a pension income and have permanently retired before age 65 having met their preservation age or another condition of release that has a nil cashing restriction;
- are receiving personal financial advice from a licensed financial adviser authorised to provide advice on Super Simplifier;
- have any one or more of the following short term and long-term objectives:
 - to hold capital/wealth during retirement
 - to provide a source of income during retirement
 - to provide an environment for concessional taxation of savings;
- have a superannuation balance of \$50,000 or more and can meet any minimum holding requirements for the investments which they may wish to acquire in their Pension Account on the recommendation of their financial adviser;
- seek more transparency over the investments held in their Pension Account;
- wish to access to the following type of products on the investment menu in implementing personal financial advice from the consumer's financial adviser, which may or may not be included in a model portfolio:
 - ASX listed Australian shares;
 - ASX listed Exchange Traded Funds (ETFs) and Exchange Traded Commodities (ETCs);
 - ASX listed hybrid securities and bonds;
 - Listed investment companies (LICs);
 - ASX listed real estate investment trusts (A-REITs);
 - Registered managed investment schemes (including hedge funds and cash management trusts); and
 - Deposits with an Australian deposit-taking institution (term deposits and at call accounts); and
- to hold of a diversified range of investment options from an approved product list.

The Super Simplifier Pension Account is **not** designed for consumers who:

- are looking for a superannuation account to make contributions to;
- are not receiving personal financial advice from a financial adviser that is authorised to advise on Super Simplifier;
- consumers that cannot roll over more than \$50,000 in order to establish their Pension Account;
- wish to manage their Pension Account without any financial advice;
- do not seek transparency over the investments held in their Pension Account;
- want a self-managed superannuation fund (SMSF).
- require insurance.

Product description and key attributes

The key eligibility requirements and product attributes of the Super Simplifier Pension Account are:

- the consumer understands preservation rules which define that amounts saved into superannuation cannot be withdrawn until retirement except in certain permitted scenarios;

- the consumer has a superannuation balance of \$50,000 or greater that is no longer fully preserved under superannuation law;
- the consumer is receiving personal financial advice from a financial adviser authorised to provide advice on Super Simplifier;
- ongoing income payments are made to the consumer at the frequency and amount selected by the consumer (subject to minimum payment requirements);
- additional concessional taxation arrangements are available to the consumer that are not available in accumulation or transition to retirement income streams.
- access to range of investment options/choices to enable a consumer to determine the investments for their Pension Account portfolio according to the risk profile of the consumer and objectives, needs and circumstances of the consumer, in conjunction with a financial adviser;
- the ability for a financial adviser to determine an appropriate model portfolio suitable for the consumer and to manage this portfolio for the consumer;
- an approved product list consisting of investments including Australian shares, ASX listed Exchange Traded Fund (ETFs), ASX listed Exchange Traded Commodities (ETCs), ASX listed hybrid securities and bonds, Listed Investment Companies (LICs), ASX listed Real Estate Investment trusts (REITs), managed funds registered by ASIC (including hedge funds and cash management trusts);
- the requirement for a Cash Management Account (CMA), stockbroking account with an approved stockbroker, account with an approved term deposit provider and a uXchange account (an investment administration platform that allows Members to purchase and sell investments in unlisted managed funds, record and facilitate the payment of distributions from underlying managed funds to the consumers linked CMA and provides holding, transaction and distribution reporting);
- visibility/transparency of all portfolio holdings;
- a technology-enabled interface which allows the consumer’s financial adviser to process transactions effectively and for the consumer to view the transactions and their portfolio valuation online.

Objectives, financial situation, and needs

Consumers will be able to select investments from an approved product list in consultation with their financial adviser, which is incorporated into the personal financial advice provided to the consumer by their financial adviser. The investment options available on the approved product list have differing characteristics which will affect whether the investment option is suitable for that individual consumer. The suitability of the investment option for the consumer will be assessed by the financial adviser as part of the process of giving personal financial advice.

The table below sets out the types of investments available to consumers in the broader market and their suitability for the class of customers Super Simplifier has been designed for. The TMD Suitability column below uses a red/ amber/ green rating methodology with appropriate colour coding.

	In target market	Potentially in target market	Not considered in target market
Consumer Investment Need	TMD Suitability		
Cash Management Account			
Term deposit options with maturity dates within 31 days			
ASX listed securities including Exchange Traded Funds, Exchange Trade Commodities, Listed Investment Companies and Real Estate Investment Trusts (A-REITs)			

ASX listed hybrid securities and bonds	
Registered managed investment schemes	
Separately managed accounts	
Model portfolios comprising the above types of products and within Approved Product List Holding Limits	
Other investment options including instalment warrants, investment restricted to wholesale investors and capital guaranteed options	
Term deposit options with maturity dates beyond 31 days	
Longevity product options	
Capital guarantee options	

Consistency between target market and the product

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 consumers. This includes consideration of expected increases in the cost of products and whether the target market is appropriate if product costs increase.

4. How this product is to be distributed

Distribution channels

This product is designed to be distributed online through financial advisers approved to use Super Simplifier.

Distribution conditions

This product should only be distributed under the following circumstances:

- a consumer must receive and continue to receive personal advice from a financial adviser (or otherwise authorised by an AFS licensee) to provide financial product advice and dealing services in respect of the product
- the product may be distributed under a robo-advised model where a consumer receives and continue to receive personal advice from a financial adviser (or otherwise authorised by an AFS licensee) to provide financial product advice and dealing services in respect of the product.

Super Simplifier is not to be distributed under the following circumstances:

- Direct retail
- General advice
- Default-enrolled by employers.

Adequacy of distribution conditions and restrictions

The issuer has appointed a promoter to be responsible for the promotion of Super Simplifier which includes but is not limited to the provision of marketing materials, training of financial advisers and overall relationship management with AFS licensees and financial advisers of AFS licensees that are authorised to provide advice on Super Simplifier. 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 after considering the target market and all disclosure documentation in place for the product.

5. Reviewing this target market determination

We will review this target market determination in accordance with the below:

Initial review	5 October 2021
Next periodic review	1 November 2022
Review triggers or events	<p>Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but is not limited to):</p> <ul style="list-style-type: none"> • a material change to key product attributes, terms and/or conditions where the product issuer considers this reasonably suggests that this TMD is no longer appropriate, including a significant update to the Product Disclosure Statement and/or the issue of a Significant Event Notice; • occurrence of a significant dealing; • distribution conditions found to be inadequate; • identification of significant detriment to consumers if TMD was not reviewed; • external events such as adverse media coverage or regulatory attention; • significant changes in metrics, including, but not limited to, complaints; • significant increase in investment option switching; • significant increase in members exiting the product; • significant proportion of insurance cancellation rates; • significant proportion of insurance claims being denied or withdrawn; • persistent member complaints about investment options or product; • suspicious adverse results from market or different returns from those expected from the market; • significant change in exposure in products, such as developments in international markets where the product may be overweight; • sale or acquisition of an asset that was/is an important part of the investment holdings of a particular investment option; • a change has occurred that effects the objectives of the target market

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

6. Reporting and monitoring this target market determination

We will collect the following information from our distributors in relation to this TMD.

Complaints	<p>Distributors will be required to report to issuers, complaints and other requested information that they receive, assisting issuers to assess whether their product governance arrangements are appropriate, and their products are meeting the needs of consumers.</p> <p>This will include the substance of complaints and general feedback relating to the product and its performance.</p> <p>Distributors will report as soon as practicable but, in any case, within 10 business days after the end of each quarter, ending on 31 March, 30 June, 30 September, and 31 December.</p>
Significant dealings	<p>Distributors will report if they become aware of a significant dealing in relation to this TMD within 10 business days.</p> <p>A significant dealing includes:</p>

- Specific proportion of consumers who have acquired the product but are not in the target market, including the proportion of consumers who are part of a class of consumers that have been specifically excluded from the target market;
- Potential/actual harm to consumers if consumers outside the target market acquire the product;
- Inconsistency of distribution conditions with the TMD;
- Proportion of superannuation contributions from the product from consumers outside the target market;
- Time period when consumers outside the target market acquired the product

TMD Definitions

Reporting and monitoring this target market determination	
Significant dealings	<p>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.</p> <p>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.</p> <p>Dealings outside this TMD may be significant because:</p> <ul style="list-style-type: none"> • 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 consumer (or class of consumer). <p>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> • the nature and risk profile of the product (which may be indicated by the product’s risk rating or withdrawal timeframes), • the actual or potential harm to a consumer (which may be indicated by the value of the consumer’s investment, their intended product use or their ability to bear loss), and • the nature and extent of the inconsistency of distribution with the TMD (which may be indicated by the number of red or amber ratings attributed to the consumer). <p>Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if:</p> <ul style="list-style-type: none"> • it constitutes more than half of the distributor’s total retail product distribution conduct in relation to the product over the reporting period, • the consumer’s intended product use is <i>Solution / Standalone</i>, or • the consumer’s intended product use is <i>Core component</i> and the consumer’s risk (ability to bear loss) and return profile is <i>Low</i>.