

# Ausbil Long Short Focus Fund

## Target Market Determination

### Target Market Summary

This product is likely to be appropriate for a consumer seeking capital growth for a satellite/small allocation investment within a portfolio where the consumer has a long investment timeframe, has a high to very high risk/return profile and requires the ability to have daily access to capital.

### Fund and Issuer identifiers

<b>Issuer</b>	<b>Ausbil Investment Management Limited</b>
<b>Issuer ABN</b>	26 076 316 473
<b>Issuer AFSL</b>	229722
<b>Fund</b>	<b>Ausbil Long Short Focus Fund</b>
<b>ARSN</b>	642 635 498
<b>APIR Code</b>	AAP8211AU
<b>ISIN Code</b>	AU60AAP82110
<b>mFund Code</b>	AXW14
<b>Date TMD approved</b>	27 March 2023
<b>TMD Version</b>	V2023-1
<b>TMD Status</b>	Current

## Description of Target Market

### TMD indicator key

The Consumer Attributes for which the product is likely to be appropriate have been assessed using a red/amber/green rating methodology with appropriate colour coding:

In target market	Potentially in target market	Not considered in target market
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### Instructions

In the tables below, Column 1, Consumer Attributes, indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering this product. Column 2, TMD indicator, indicates whether a customer meeting the attribute in column 1 is likely to be in the target market for this product.

Generally, a consumer is unlikely to be in the target market for the product if:

- **one or more** of their Consumer Attributes correspond to a **red** rating, or
- **three or more** of their Consumer Attributes correspond to an **amber** rating.

Definitions of terms are in the attachment.

### 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*). 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).

Consumer Attributes	TMD Indicator for Fund	Product description including key attributes
<b>Consumer's investment objective</b>		
Capital Growth	In target market	The Fund aims to provide positive investment returns over the long term. There is no guarantee that this objective will be achieved.
Capital Preservation	Potentially in target market	
Capital Guaranteed	Not considered in target market	
Income Distribution	Potentially in target market	
<b>Consumer's intended product use</b>		
Solution/Standalone (75-100%)	Not considered in target market	The Fund may have a long equity exposure and/or short equity exposure of Australian and international securities, being listed and unlisted securities, including, but not limited to, pre-IPO securities, equity swaps, options and convertible securities. The Fund will hold a maximum of 100 stock positions for its long equity exposure. The Fund uses short selling with the aim of enhancing returns. Ausbil shorts securities by borrowing securities through the Prime Broker then selling them in the market in the expectation that they will be repurchased at a price lower than the initial sale price and then returned to the Prime Broker. The Fund will hold a maximum of 100 stock positions for its 'short' equity exposure. The Fund will typically operate within a net equity exposure band of -25% to +25%. However, the Fund has a minimum net equity exposure of -100% and a maximum of +100%. The Fund's maximum gross exposure is 200%.  The Fund has <i>Medium</i> portfolio diversification.
Core Component (25-75%)	Not considered in target market	
Satellite/small allocation (<25%)	In target market	
<b>Consumer's investment timeframe</b>		
Short ( $\leq 2$ years)	Not considered in target market	The Fund is designed for investors with at least a five year investment time horizon, who wish to benefit from the long-term capital gains available from share investments and who are comfortable with fluctuations in capital value in the short to medium term.
Medium ( $> 2$ years)	Potentially in target market	

Long (> 8 years)	In target market	
<b>Consumer's Risk (ability to bear loss) and Return profile</b>		
Low	Not considered in target market	Very high risk of losing money in any year. Likely to produce higher returns over the long term. Standard Risk Measure 7.
Medium	Potentially in target market	The Fund is in the target market, ie appropriate for consumers with a high or very high risk/return profile, if the consumer's intended use for the Fund is a satellite/small allocation of their overall investable assets.
High	In target market	
Very high	In target market	The Fund is potentially in the target market, ie appropriate for those consumers with a medium risk/return profile, if the consumer's intended use for the Fund is a satellite/small allocation of their overall investable assets, ie it is used as part of a diversified portfolio.
<b>Consumer's need to withdraw money</b>		
Daily	In target market	Under normal circumstances, the Fund offers daily withdrawals and unitholders will receive the value of their investment effective the day of withdrawal (or next business day if the withdrawal is made on a non-business day) by providing a redemption request to the Administrator before 2.30pm (Sydney time). The withdrawal is generally paid to the unitholder's bank account within 7 Business Days of the effective date of withdrawal.
Weekly	In target market	
Monthly	In target market	
Quarterly	In target market	
Annually or longer	In target market	

## Appropriateness

Ausbil has assessed the product and formed the view that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described. As the attributes of this Fund in the table above are likely to be suitable for consumers with the attributes identified with a green TMD Indicator.

## Distribution conditions/restrictions

Distribution Condition	Distribution Condition Rationale
<p>The fund is distributed in the following ways:</p> <ul style="list-style-type: none"> <li>• Directly, in accordance with the relevant disclosure and application form(s);</li> <li>• Through brokers who use the mFund service;</li> <li>• Through appointed financial advisers who confirm they meet relevant criteria; and</li> <li>• Through investment or superannuation platform products, including within managed accounts or portfolios.</li> </ul>	<p>The distribution condition defines the appropriate distribution channels for the fund.</p>

Review triggers
Material change to key attributes, fund investment objective and/or fees.
Material deviation from benchmark / objective over sustained period.
Key attributes have not performed as disclosed by a material degree and for a material period.
Determination by the issuer of an ASIC reportable Significant Dealing
Material high number of complaints (as defined in section 994A(1) of the Act) about the product or distribution of the product.
The use of Product Intervention Powers, regulator orders or directions that affects the product.

Mandatory review periods	
Review period	Maximum period for review
Initial review	1 year - The initial review will occur by 5th October 2022. This review was completed 30 September 2022.
Subsequent review	3 years - We will review this document every three years from the effective date to ensure it remains appropriate, or earlier if other circumstances occur which trigger the need to review the Target Market Determination on or before 5 October 2025.

Distributor reporting requirements		
Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Act) relating to the product design, product availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	Within 10 business days following the end of calendar quarter.	All distributors
Significant dealing outside of target market, under s994F(6) of the Act. See Definitions for further detail.	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	All distributors
To the extent a distributor is aware, dealings outside the target market, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	Within 10 business days following the end of calendar quarter.	All distributors

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to Ausbil using the agreed methodology. Contact details relating to this TMD for Ausbil are:

**Ausbil Investment Management Limited**  
 DDO Officer  
 E: [ddo@ausbil.com.au](mailto:ddo@ausbil.com.au)  
 PH: (02) 9259 0200

## Legal disclaimer

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 Ausbil Investment Management's 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 Document for Ausbil Long Short Focus Fund 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 by visiting [www.ausbil.com.au](http://www.ausbil.com.au).

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## Definitions

Term	Definition
<b>Consumer's investment objective</b>	
Capital Growth	The consumer seeks to invest in a product designed to generate capital return. The consumer prefers exposure to growth assets (such as shares or property) or otherwise seeks an investment return above the current inflation rate.
Capital Preservation	The consumer seeks to invest in a product to reduce volatility and minimise loss in a market down-turn. The consumer prefers exposure to defensive assets (such as cash or fixed income securities) that are generally lower in risk and less volatile than growth investments.
Capital Guaranteed	The consumer seeks a guarantee or protection against capital loss whilst still seeking the potential for capital growth (typically gained through a derivative arrangement). The consumer would likely understand the complexities, conditions and risks that are associated with such products.
Income Distribution	The consumer seeks to invest in a product designed to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (typically, high dividend-yielding equities, fixed income securities and money market instruments).
<b>Consumer's intended product use (% of Investable Assets)</b>	
Solution/Standalone (75-100%)	The consumer intends to hold the investment as either a part or the majority (up to 100%) of their total <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least High <i>portfolio diversification</i> (see definitions below).
Core Component (25-75%)	The consumer intends to hold the investment as a major component, up to 75%, of their total <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least Medium <i>portfolio diversification</i> (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 <i>investable assets</i> (see definition below). The consumer is likely to be comfortable with exposure to a product with Low <i>portfolio diversification</i> (see definitions below).
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.
<b>Portfolio diversification (for completing the key product attribute section of consumer's intended product use)</b>	
Low	Single asset class, single country, low or moderate holdings of securities - e.g. high conviction Aussie equities.



Term	Definition
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).
<b>Consumer’s intended investment timeframe</b>	
Short ( $\leq 2$ years)	The consumer has a short investment timeframe and may wish to redeem within two years.
Medium ( $> 2$ years)	The consumer has a medium investment timeframe and is unlikely to redeem within two years.
Long ( $> 8$ years)	The consumer has a long investment timeframe and is unlikely to redeem within eight years.
<b>Consumer’s Risk (ability to bear loss) and Return profile</b>	
Low	The consumer is conservative or low risk in nature, seeks to minimise potential losses (e.g. has the ability to bear up to 1 negative return over a 20 year period (SRM 1 to 2)) and is comfortable with a low target return profile. Consumer typically prefers defensive assets such as cash and fixed income.
Medium	The consumer is moderate or medium risk in nature, seeking to minimise potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)) and comfortable with a moderate target return profile. Consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.
High	The consumer is higher risk in nature and can accept higher potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 6)) in order to target a higher target return profile. Consumer typically prefers predominantly growth assets such as shares, property and alternative assets with only a smaller or moderate holding in defensive assets such as cash and fixed income.
Very high	The consumer has a more aggressive or very high risk appetite, seeks to maximise returns and can accept higher potential losses (e.g. has the ability to bear 6 or more negative returns over a 20 year period (SRM 7) and possibly other risk factors, such as leverage). Consumer typically prefers growth assets such as shares, property and alternative assets.
<b>Consumer’s need to withdraw money</b>	
Daily/Weekly/Monthly/Quarterly/ Annually or longer	The consumer seeks to invest in a product which permits redemption requests at this frequency under ordinary circumstances and the issuer is typically able to meet that request within a reasonable period.
<b>Distributor Reporting</b>	
Significant dealings	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.

Term	Definition
	<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"> <li>• they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or</li> <li>• 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).</li> </ul> <p>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> <li>• the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes),</li> <li>• 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</li> <li>• 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).</li> </ul> <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"> <li>• it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the reporting period,</li> <li>• the consumer's intended product use is <i>Solution / Standalone</i>, or</li> <li>• 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>.</li> </ul>