



Target Market Determination

Morningstar High Growth Real Return Fund - Class A

Introduction

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

This document is **not** a product disclosure statement (**PDS**) and is **not** a complete 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 the product 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 morningstarinvestments.com.au/classa.

Target Market Summary

This product is intended for use as a standalone or core holding of a portfolio for a consumer who is seeking the potential for capital growth and has a medium to high risk and return profile for that portion of their investment portfolio. It is likely to be consistent with the financial situation and needs of a consumer with a longer investment timeframe and who is unlikely to need to withdraw their money with less than one week’s notice.

Fund and Issuer identifiers

Issuer	Morningstar Investment Management Australia Limited
Issuer ABN	54 071 808 501
Issuer AFSL	228986

TMD contact details	ddo@morningstarinvestments.com.au
Fund name	Morningstar High Growth Real Return Fund – Class A
ARSN	092 226 358
APIR Code	INT0042AU
ISIN Code	AU60INT00425
TMD issue date	15 June 2023
TMD Version	3.0
Distribution status of fund	Available

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 and green rating methodology:



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 consumer meeting the attribute in column 1 is likely to be in the target market for this product.

Appropriateness

The Issuer 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 the features of this product in Column 3 of the table below are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (for example, with an intended product use of *minor allocation*). 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 balanced or moderate diversified portfolio with a minor allocation to growth assets. In this case, a



product with a *High* risk/return profile may be consistent with the consumer’s objectives for that *minor allocation* notwithstanding that the risk/return profile of the consumer as a whole is *Medium*. In making this assessment, distributors should consider all features of a product (including its key attributes).

The FSC has provided more detailed guidance on how to take this *portfolio view* for diversification, available on the [FSC website](#). This guidance only applies where a product is held as part of an appropriately diversified portfolio.

Consumer Attributes	TMD Indicator	Product description including key attributes
Consumer’s investment objective		
Capital Growth	In target market	The Fund aims to earn a rate of return that exceeds inflation (as measured by the Consumer Price Index) by at least 4.5% p.a. over rolling 9-year periods. It aims to do so by delivering above inflation returns over the targeted investment horizon.
Capital Preservation	Not considered in target market	
Income Distribution	Not considered in target market	
Consumer’s intended product use (% of Investable Assets)		
Solution/Standalone (up to 100%)	In target market	The Fund is designed for investors who seek the potential for capital growth by investing in a diversified portfolio of predominantly growth asset classes, with a small proportion of defensive asset classes.
Major allocation (up to 75%)	In target market	
Core Component (up to 50%)	In target market	
Minor allocation (up to 25%)	In target market	
Satellite allocation (up to 10%)	In target market	
Consumer’s investment timeframe		
Minimum investment timeframe	9 years	The minimum suggested timeframe for holding investments in the Fund is 9 years.
Consumer’s Risk (ability to bear loss) and Return profile		
Low	Not considered in target market	The Fund has a Risk Level / Profile of “High” and a long-term average exposure of around 90% growth assets such as shares, property, and infrastructure, and around 10% defensive assets such as cash and fixed interest.
Medium	Not considered in target market	
High	In target market	

Consumer Attributes	TMD Indicator	Product description including key attributes
Very high	In target market	
Extremely high	In target market	
Consumer's need to access capital		
Within one week of request	In target market	<p>Normally, redemption proceeds will be paid within 4 Business Days following receipt of the redemption request, but there can be delays in payment.</p> <p>In some circumstances, investors may not be able to redeem units within the usual period on request (for example, if it is not possible or not in the best interests of investors for Morningstar to make payments or if the total value of the assets in the Fund cannot be calculated due to circumstances beyond Morningstar's control).</p> <p>Under its Constitution, if the Fund is liquid, redemptions are to be paid within 30 days from receipt of a redemption request. However, Morningstar will endeavour to pay redemption requests as soon as possible.</p> <p>If the Fund is not liquid (as defined in the Corporations Act), investors may only redeem from the Fund in accordance with the terms of a redemption offer made by Morningstar.</p>
Within one month of request	In target market	
Within three months of request	In target market	
Within one year of request	In target market	
Within 5 years of request	In target market	
Within 10 years of request	In target market	
10 years or more	In target market	

Distribution conditions/restrictions

Distribution Conditions	Distribution Condition Rationale	<i>Distributors this condition applies to</i>
Only suitable for distribution through dealing through specified distributors.	Available to retail investors directly, on the basis the investor completes the questionnaire within the application form, which Morningstar reviews their response to a key TMD condition. Also eligible for distribution via advisers through administration platforms where Morningstar has made the fund available for the adviser's clients. Where an adviser is used, the investor/client must have received personal advice prior to investing.	Morningstar, financial advisers and administration platforms.

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 or unexpectedly 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 TMD review periods

Review period	Maximum period for review
Initial review	Not applicable – initial review has already occurred.
Subsequent review	1 year and 3 months.

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. The distributor should provide all the content of the complaint, having regard to privacy.	As soon as practicable but no later than 10 business days following 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

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to Morningstar using the method specified on the website (morningstarinvestments.com.au/distributor-report). This link also provides contact details relating to this TMD for Morningstar.

Disclaimer

© 2021 Financial Services Council Limited ABN 82 080 744 163.

The intellectual property rights in this document, including the copyright in the document, are owned by and retained by the FSC and its licensors. The FSC grants you a non-exclusive non-transferable licence for you and the organisation you represent (the User) to use this document internally within the User's business, including making copies, reproductions, and modifications of the document, and otherwise as expressly set out in the conditions below for so long as the User remains a member of the FSC or has paid the licence fee prescribed by the FSC for use, and solely for the purpose of making and using Target Market Determinations.

The grant of this licence is also conditional on and subject to the following

- 1. you and the User agree not to copy, distribute, communicate online or otherwise make available this document or any part of it to any other person without the prior written consent of the FSC,*
- 2. you and the User however:*
 - (a) may use this document in whole or in part in order to make Target Market Determinations (TMDs) in respect of the User's financial products for the purposes of compliance with Part 7.8A of the Corporations Act 2001 (Cth) and related Corporations Regulations (Act);*
 - (b) may make the User's TMDs publicly available as required by law;*
 - (c) may make the User's TMDs available to suppliers, service providers and distributors of the User's financial products for the purposes of complying with Part 7.8A of the Act, and on condition that you and the User obtain a binding and enforceable acknowledgement from each distributor or other person to whom this document is provided in accordance with these conditions, that the conditions set out in this document apply to the provision of this document to that person/those persons and that they do not have any further right to use, copy, reproduce, adapt, communicate online or otherwise make available this document other than to the extent necessary in order to comply with the Design and Distribution Obligations regime of the Act.*

You and the User acknowledge and agree that the information contained in this document has been collated and prepared by the FSC for the sole purpose of assisting Users to manage their compliance with Part 7.8A of the Act. The information contained in this document is based on current sources and practice as at 2021. The information contained in this document may need to be updated and revised as new sources of information emerge or practices change over time.

Users should use their own judgment when making use of this material and should carefully evaluate its currency, completeness and relevance for their own purposes as well as the extent to which this material can or should be modified to suit the User's products.

While steps have been taken to ensure the accuracy of the information contained in this document, the FSC does not guarantee, and accepts no legal liability whatsoever or howsoever arising from or connected to, the accuracy, currency, completeness of any material contained in this document (including any liability that may flow directly or indirectly from the modification of the information contained in this document) and makes no warranties as to suitability for you or non-infringement or for compliance with the TMD content requirements under Part 7.8A of the Act.

Definitions

In some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Term	Definition
Consumer's investment objective	
Capital Growth	The consumer seeks to invest in a product designed or expected to generate capital return over the investment timeframe. 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 designed or expected to have low volatility and minimise capital loss. The consumer prefers exposure to defensive assets that are generally lower in risk and less volatile than growth investments (this may include cash or fixed income securities).
Income Distribution	The consumer seeks to invest in a product designed or expected to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (this may include high dividend-yielding equities, fixed income securities and money market instruments).
Consumer's intended product use (% of Investable Assets)	
Solution/Standalone (up to 100%)	The consumer may hold the investment as up to 100% of their total <i>investable assets</i> . The consumer is likely to seek a product with <i>very high</i> portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>high</i> portfolio diversification.
Core Component (up to 50%)	The consumer may hold the investment as up to 50% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>medium</i> portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>low</i> portfolio diversification.
Satellite allocation (up to 10%)	The consumer may hold the investment as up to 10% of the total <i>investable assets</i> . The consumer may seek a product with <i>very low</i> portfolio diversification. Products classified as <i>extremely high</i> risk are likely to meet this category only.
<i>Investable Assets</i>	Those assets that the investor has available for investment, excluding the residential home.

Term	Definition
Portfolio diversification (for completing the key product attribute section of consumer's intended product use)	
Note: exposures to cash and cash-like instruments may sit outside the diversification framework below.	
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).
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).
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).
High	The product provides exposure to a large number of holdings (for example, over 50 securities) in more than one broad asset class, sector or geographic market (for example, global equities).
Very high	The product provides exposure to a large number of holdings across a broad range of asset classes, sectors <u>and</u> geographic markets with limited correlation to each other.
Consumer's intended investment timeframe	
Minimum	The minimum suggested timeframe for holding the product. Typically, this is the rolling period over which the investment objective of the product is likely to be achieved.
Consumer's Risk (ability to bear loss) and Return profile	
<p>This TMD uses the Standard Risk Measure (SRM) to estimate the likely number of negative annual returns for this product over a 20 year period, using the guidance and methodology outlined in the <i>Standard Risk Measure Guidance Paper For Trustees</i> (note the bands in the SRM guidance differ from the bands used in this TMD). However, SRM is not a complete assessment of risk and potential loss. For example, it does not detail important issues such as the potential size of a negative return (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some products may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating.</p> <p>A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>	

Term	Definition
Low	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a conservative or low risk appetite, • seeks to minimise volatility and 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. <p>The consumer typically prefers stable, defensive assets (such as cash).</p>
Medium	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a moderate or medium risk appetite, • seeks low volatility and potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)), and • is comfortable with a moderate target return profile. <p>The consumer typically prefers defensive assets (for example, fixed income).</p>
High	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a high risk appetite, • can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)), and • seeks high returns (typically over a medium or long timeframe). <p>The consumer typically prefers growth assets (for example, shares and property).</p>
Very high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <p>has a very high risk appetite, can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)), and seeks to maximise returns (typically over a medium or long timeframe).</p> <p>The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).</p>
Extremely high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <p>has an extremely high risk appetite, can accept significant volatility and losses, and seeks to obtain accelerated returns (potentially in a short timeframe).</p> <p>The consumer seeks extremely high risk, speculative or complex products which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes (for example, crypto-assets or collectibles).</p>
Consumer's need to access capital	

Term	Definition
	<p>This consumer attribute addresses the likely period of time between the making of a request to access capital and the receipt of proceeds under ordinary circumstances. Issuers should consider both the frequency for accepting requests to access capital and the length of time to accept, process and distribute the proceeds of a request. To the extent that the liquidity of the underlying investments or possible liquidity constraints (e.g. ability to stagger or delay redemptions) could impact this, this is to be taken into consideration in aligning the product to the consumer's need to access capital. Where a product is held on investment platforms, distributors also need to factor in the length of time platforms take to process capital access requests for underlying investments. Where access to capital from the product is likely to occur through a secondary market, the liquidity of the market for the product and costs of selling on market should be considered (including in times of market stress).</p>

Term	Definition
Distributor Reporting	
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 and/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 quarter, • the consumer’s intended product use is <i>solution/standalone</i>, • the consumer’s intended product use is <i>core component</i> or higher and the consumer’s risk/return profile is <i>low</i>, or • the relevant product has a green rating for consumers seeking <i>extremely high</i> risk/return.