



**CFMG**  
Funds  
Management

# CFMG Land and Opportunity Fund (Product)

## Target Market Determination

This Target Market Determination (**TMD**) is required under section 994B of the Corporations Act 2001 (Cth) (**Corporations Act**). It sets out the objectives, financial situation and needs of the class of consumers for whom the Product would be consistent. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of CFMG Equity and Income Funds Limited's (**CFMG**) 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 the Product should carefully read the Product Disclosure Statement (**PDS**) for the Product before making a decision whether to buy the Product.



## TARGET MARKET SUMMARY

The Product is likely to be appropriate for a consumer seeking capital growth to be used within a portfolio where the consumer has a medium to long investment timeframe, a high or very high risk/return profile and needs no immediate or medium-term access to capital. This Product is not suitable for a consumer who requires a guaranteed return of capital or regular income.

## PRODUCT DETAILS

<b>Issuer</b>	CFMG Equity and Income Funds Limited
<b>Issuer ABN</b>	12 112 753 876
<b>Issuer AFSL</b>	291390
<b>Fund</b>	CFMG Land and Opportunity Fund
<b>ARSN</b>	602 610 006
<b>Date TMD approved</b>	30 September 2021

## DESCRIPTION OF TARGET MARKET

<b>Consumer Attribute</b> <i>A description of the likely objectives, financial situation and needs of the class of consumers in the target market</i>		<b>Product Key Attribute</b> <i>A description of the Product, including its key attributes</i>
Investment objective:	Income returns payable concurrently with redemption	<p>The Product is designed for those consumers whose primary objective is the earning of income which is received concurrently with redemption of the investment at the end of the term.</p> <p>The Product is designed for retail investors seeking a relatively high rate of return paid at the end of a medium term (between 1 and 3 years).</p> <p>CFMG specifically points out that the Product does not necessarily give:</p> <p>Guaranteed return of capital Regular income</p> <p>and so CFMG considers a consumer <i>whose primary or sole objective is either of those attributes</i> is not within the target market for the Product.</p>
Intended product use:	Core component (25 – 75%) Satellite/small allocation (<25%)	<p>Given the consumer would have or have the potential for diversification across its other investments CFMG considers the Product would be appropriate as up to 75% of that consumer's investment mix as diversification within the one, single investment is not essential or necessarily desired.</p> <p>CFMG considers the Product is not appropriate as the sole investment held by a consumer as it has no diversification as a feature.</p>
Investment time frame:	Medium ( $\leq$ 6 years) Long (> 6 years)	<p>Consumers who can accept a medium investment time frame (up to 5 years) or a long investment time frame (greater than 5 years) are in the target market for the Product.</p> <p>Consumers who need or seek a short investment time frame (less than 2 years) are not in the target market for the Product because CFMG does not promise that the investment or return will be paid to the consumer necessarily within 2 years.</p>
Risk and return profile:	Very high High	<p>Consumers who have a very high risk and return profile (i.e. a strong ability to bear loss) or a high risk and return profile (i.e. a reasonably strong ability to bear loss) are in the target market for the Product.</p> <p>The Product is designed for consumers who are higher risk in nature and can accept higher potential losses (e.g. have the ability to bear up to 6 negative returns over a 20 year period in order to target a higher target return profile).</p> <p>This Product is not appropriate for consumers who have a low risk and return profile (i.e. little or no ability to bear loss) or medium risk and return profile (i.e. a reasonably strong ability to bear loss).</p>
Withdrawal needs:	Every two years or longer	<p>Consumers who will need to withdraw money from their investment no less than every two years or longer are in the target market for the Product.</p> <p>Redemption is not available until the expiry of the term of the Product, generally only when the relevant property development company in whom the Product invests completes the property development project and repays the relevant loan to the Product or redeems the Product's investment in the relevant securities.</p> <p>This Product is not suitable for consumers who require more frequent access to their capital.</p>

## APPROPRIATENESS OF PRODUCT

CFMG 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 above, as the features of this Product are likely to be suitable for consumers who are identified above.

## DISTRIBUTION CONDITIONS/RESTRICTIONS

CFMG has no distribution conditions for the Product.

## REVIEW TRIGGERS

- The following events will give rise to CFMG reviewing its TMD in respect of the Product:
- Material change to key attributes, fund investment objective and/or fees
- Key attributes have not performed as disclosed by a material degree and for a material period
- CFMG determining an ASIC reportable significant dealing has occurred
- Material or unexpectedly high number of complaints (as defined in section 994A(1) of the Corporations Act) about the Product or distribution of the Product.
- Any Product Intervention Powers, regulator orders or directions that affects the Product.

## MANDATORY REVIEW PERIODS

Review period	Maximum period for review
Initial review	1 year and 3 months
Subsequent review	3 years and 3 months

## DISTRIBUTOR REPORTING REQUIREMENTS

CFMG is the only distributor of the Product and so the following provisions shall only apply in circumstances where CFMG has authorised a distributor to distribute the Product.

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Corporations Act) relating to the Product's design, availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	Within 10 business days following end of calendar quarter	All distributors
Significant dealing outside of target market, under s994F(6) of the Corporations Act.	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 of dealings outside the target market these should be reported to CFMG, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	Within 10 business days following end of calendar quarter	All distributors

## RECORD KEEPING

CFMG will maintain records of the reasonable steps taken to ensure that this Product is sold in a manner consistent with this TMD.

CFMG will also prepare and maintain complete and accurate records of its decisions, and the reasons for those decisions, in relation to:

- All target market determinations for this Product;
- Identifying and tracking review triggers;
- Setting review periods; and
- The matters documented in this TMD.



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