

TARGET MARKET DETERMINATION – HUB24 MANAGED PORTFOLIO SERVICE

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 the product issuer'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 and does not contain any financial product advice. Persons interested in acquiring this product should carefully read the Product Disclosure Document (PDS) for the product and the investment options that sit within the product before making a decision whether to buy this product. Consumers can access a copy of the PDS for the product online through their AdviserHUB or InvestorHUB account.

PRODUCT INFORMATION AND KEY ATTRIBUTES

Name of product	HUB24 Managed Portfolio Service (the 'Scheme')
Product Issuer	Ironbark Asset Management (Fund Services) Limited (ABN 63 116 232 154 AFSL 298626)
ARSN	645 033 941
Date of TMD	30 September 2022
Status	Current
Version	2

Product Description	This product is a non-unitised managed investment scheme which contains a range of managed portfolio options designed and constructed by professional portfolio managers (Managed Portfolios). When a consumer purchases a Managed Portfolio, they will buy into a portfolio of assets which are professionally managed for them, where they will have beneficial ownership of all assets in their portfolio.
Key product attributes	<p>This product provides consumers with access to a range of Managed Portfolio options with various investment strategies and mandates. Consumer's may select Managed Portfolios which meet their individual needs. Some of the key features of the Managed Portfolios include:</p> <ul style="list-style-type: none"> • Each Managed Portfolio option is designed, monitored and advised on by a portfolio manager that has been selected by HUB24. • Transparency of assets in the portfolio. • Customisation of investment preferences within a managed portfolio by excluding and substituting investments. • The ability to switch investments between Managed Portfolios or, if permitted by the underlying issuer, take investments out of Managed Portfolios and hold them through their Platform Account with the aim of minimising the potential of a capital gains tax event. • Greater control of personal tax outcomes. • Simple and efficient administration of the Managed Portfolios on your behalf including the receipt of any income, corporate actions and reporting.

THE TARGET MARKET

The information below summarises the overall class of consumers that fall within the target market for the product, based on the key product attributes and the consumer's objectives, financial situation and needs that it has been designed to meet.

The following objectives, financial situations and needs describe the overall target market for the product but must be read in conjunction with the sub-target markets below to identify whether the consumer falls within the target market for the product and for the Managed Portfolio option they invest in.

Important terms used in this TMD are defined in the Definitions section of this document.

Customer's objectives, financial situation and needs	Target Market
Customer's objectives	A consumer should have objectives that align with the table under the heading 'Sub-target markets for investment categories within this product'. The table outlines the target market for each investment category that a managed portfolio option available within this product may belong to. For each category, it sets out the class of consumers that the category

Customer's objectives, financial situation and needs	<p>Target Market</p> <p>has been designed for based on their likely objectives. To find out which category a Managed Portfolio option belongs to, please refer to the 'Category' column in the managed portfolio investment menu available within AdviserHUB or InvestorHUB under Investments > Managed Portfolios.</p> <p>A consumer will fall within the target market for this product if they satisfy all the consumer objectives relevant for the Managed Portfolio option they intend to invest, and their financial situations and needs match those which are outlined in this table.</p>
Consumer's financial situation	<p>Consumer's lifestage</p> <p>A consumer who is over the age of 18, in all stages of life due to varying investment timeframes and risk profiles available within the Managed Portfolio options.</p> <p>Initial investment amounts</p> <p>A customer who intends to invest any amount subject to meeting the minimum initial investment amount for a particular Managed Portfolio option (where there is a minimum requirement).</p> <p>Consumer's can refer to the PDS for the relevant Managed Portfolio option to find the minimum initial investment amount that is applicable for an investment.</p>
Customer's needs	<p>Consumer's desired level of decision making</p> <p>A consumer that desires a level of decision making which includes:</p> <ul style="list-style-type: none"> • Easy access to Managed Portfolio options from an extensive investment menu that are monitored and managed on an ongoing basis. • Having the ability to substitute and/or exclude certain investments within the product. • The ability to switch between Managed Portfolio options using existing investment holdings which are common between the options. • The ability to move investment holdings out of a Managed Portfolio (if permitted by an underlying issuer) to be held through their Platform Account without resulting in a capital gains tax event. • Having the ability to manage individual tax outcomes of underlying investments in the Managed Portfolio. • Having visibility/transparency of holdings in the Managed Portfolio. <p>Consumer's desired type of products on investment menu</p> <p>This product may be suitable for consumers that desire any one or more of the following investment options:</p>

Customer's objectives, financial situation and needs	Target Market
	<ul style="list-style-type: none"> • Ready-made diversified portfolio solutions to suit a range of risk/return profiles. • Ready-made portfolio solutions that are asset class specific or a combination of asset classes. Examples include, Australian equity portfolios, International equity portfolios, Property and infrastructure portfolios, Fixed income portfolios and Multi-sector portfolios.

SUB-TARGET MARKET FOR INVESTMENT CATEGORIES WITHIN THIS PRODUCT

Further information on the Managed Portfolios which belong in each investment categories can be found in the Definitions section of this document.

Investment category	Customer's objectives				
	Consumers investment objective	Consumers intended product use	Consumers investment timeframe	Consumers risk (ability to bear loss) and return profile	Consumers need to withdraw money
The managed portfolio options available within this product under the category found in the left hand column is designed for consumers...					
Australian Large Cap	Seeking capital growth and/or income distribution .	Seeking a core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments.	With at least a medium-term (>2 years) investment time frame.	Willing to accept medium to very high risk. Managed portfolio options in this category generally have an SRM of 4 to 7.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.
Australian Small and Mid Cap	Seeking capital growth and/or income distribution .	Seeking a satellite component (<25%) of an investor's broader portfolio of investments.	With at least a medium-term (>2 years) investment time frame.	Willing to accept medium to very high risk. Managed portfolio options in this category generally have an SRM of 4 to 7.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.

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The managed portfolio options available within this product under the category found in the left hand column is designed for consumers...					
Property and Infrastructure	Seeking capital growth and/or income distribution .	Seeking a satellite component (<25%) of an investor's broader portfolio of investments.	With at least a medium-term (>2 years) investment time frame.	Willing to high risk. Managed portfolio options in this category generally have an SRM of 6.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.
Fixed Income	Seeking capital preservation and/or income distribution .	Seeking a core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments.	With a short-term (<2 years) investment time frame.	Willing to accept low to medium risk. Managed portfolio options in this category generally have an SRM of 1 to 4.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.
International Equity	Seeking capital growth .	Seeking a core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments.	With at least a medium-term (>2 years) investment time frame.	Willing to accept medium to very high risk. Managed portfolio options in this category generally have an SRM of 4 to 7.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.

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Multi Sector - Conservative	Seeking capital preservation and/or income distribution .	Seeking a standalone solution (75-100%), core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments.	With a short-term (<2 years) investment time frame.	Willing to accept low to medium risk. Managed portfolio options in this category generally have an SRM of 2 to 5.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.
Multi Sector - Moderately Conservative	Seeking capital growth , capital preservation and/or income distribution .	Seeking a standalone solution (75-100%), core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments.	With at least a medium-term (>2 years) investment time frame.	Willing to accept medium to high risk. Managed portfolio options in this category generally have an SRM of 3 to 6.	Who may need to withdraw part or most of their investment on relatively short notice (ie within 10 business days) under normal market circumstances.
Multi Sector - Balanced	Seeking capital growth and/or income distribution .	Seeking a standalone solution (75-100%), core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments.	With at least a medium-term (>2 years) investment time frame.	Willing to accept medium to high risk. Managed portfolio options in this category generally have an SRM of 4 to 6.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.

Investment category	Customer's objectives				
	Consumers investment objective	Consumers intended product use	Consumers investment timeframe	Consumers risk (ability to bear loss) and return profile	Consumers need to withdraw money
The managed portfolio options available within this product under the category found in the left hand column is designed for consumers...					
Multi Sector - Growth	Seeking capital growth and/or income distribution .	Seeking a standalone solution (75-100%), core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments.	With at least a medium-term (>2 years) investment time frame.	Willing to accept medium to very high risk. Managed portfolio options in this category generally have an SRM of 5 to 7.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.
Multi Sector - High Growth	Seeking capital growth .	Seeking a standalone solution (75-100%), core (25-75%) or satellite component (<25%) of an investor's broader portfolio of investments.	With at least a medium-term (>2 years) investment time frame.	Willing to accept high to very high risk. Managed portfolio options in this category generally have an SRM of 6 to 7.	Who may need to withdraw part or most of their investment on relatively short notice (i.e within 10 business days) under normal market circumstances.

WHO THIS PRODUCT IS NOT DESIGNED FOR

This product has not been designed for consumers who:

- Are seeking to fully manage their own portfolio of investments;
- Do not have a financial adviser.
- Do not hold a HUB24 Account.

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 objectives, financial situation and needs of consumers in the target market as described above. This is because the product:

- Has been designed for consumers seeking access to a broad range of investment options across several investment categories that are monitored and managed on an ongoing basis.
- Provides consumers with features to customise investment preference within the Managed Portfolios and manage tax outcomes depending on their financial situations.

DISTRIBUTION CONDITIONS/RESTRICTIONS

This product can only be distributed under the following circumstances:

Distribution channels	Permitted Distribution Channel	Distribution conditions	Distribution condition rationale
Distribution to consumers through an approved provider	Yes	Distributor is required to provide confirmation: <ul style="list-style-type: none"> • That they have provided the consumer with personal advice in relation to the product; or • If personal advice has not been provided, then they have assessed that the consumer fits within the target market for the product. 	Distribution should occur through an approved provider in the manner described because: <ul style="list-style-type: none"> • the product features and attributes may be complex in nature; • the Issuer has implemented relevant criteria for determining when to approve a relevant distributor/provider to distribute the product – and has therefore considered whether the approved provider is suitable to distribute the product.
Distribution to consumers through a specified platform	Yes	Only suitable to be distributed through HUB24 Invest, HUB24 Super, or any branded version of either of these products unless otherwise authorised by HUB24.	This product is only available through the specified platform.
Distribution to consumers directly	No	Not applicable. This condition does not apply to: <ul style="list-style-type: none"> • consumers who acquire the Platform Account through an approved provider and subsequently ceased their relationship with an approved provider. • consumers who acquired the Platform Account prior to 5 October not through an approved propvider. 	As the product features and attributes may be complex in nature, it is not suitable for distribution directly to retail consumers.

REVIEW TRIGGERS

Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited to):

Review triggers	Description
ASIC reportable significant dealings outside of TMD	The Issuer identifies any ASIC reportable significant dealings outside of the TMD.
Complaints from consumers and distributors	A material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act), over an appropriate period, relating to the product.
Material product and/or regulatory change	Material change to key product attributes, investment objectives, fees, terms and/or conditions that suggest this TMD is no longer appropriate.
Product performance	If the Issuer identifies significant or sustained poor performance of a Managed Portfolio option where there is a risk that their investment objectives are not likely to be met, reasonably suggesting that this TMD is no longer appropriate.
Product outflows	If the Issuer identifies a significant increase in product outflows, reasonably suggesting that this TMD is no longer appropriate.
Product liquidity	If the Issuer identifies the liquidity of the Managed Portfolio options has changed and is no longer able to offer regular withdrawals, reasonably suggesting that this TMD is no longer appropriate.
Material breach	A material breach of financial services law that relates to the design and/or distribution of the product.
Notification from ASIC	A notification from ASIC relating to any concerns about the design and/or distribution of the product.
External events	External events such as adverse media coverage which would significantly impact the sustainability of the product or regulatory changes that significantly affect the product or the distribution of the product

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

MANDATORY REVIEW PERIODS

	Maximum period for completion of review
Periodic review	By 30 September 2024

DISTRIBUTOR REPORTING REQUIREMENTS

The following reporting requirements apply to all distributors.

Reporting requirement	Reporting period
<p>Complaints (as defined in section 994A(1) of the Corporations Act) received during a calendar quarter relating to the product, including the number and substance of the complaints and general feedback relating to the product and its performance. The distributor should provide all the content of the complaint, having regard to privacy considerations.</p>	<p>Within 10 business days following the end of each calendar quarter in respect of the previous calendar quarter.</p>
<p>Significant dealings outside of target market under section 994F(6) of the Corporations Act. Information to include (as relevant):</p> <ul style="list-style-type: none"> • Date(s) of the significant dealing • Description of the significant dealing • Explanation of why the dealing is significant • How was the significant dealing identified • What steps, if any, have been, or will be, taken in relation to the significant dealing <p>See Definitions for further information and guidance around significant dealings.</p>	<p>As soon as practicable but no later than 10 business days after the distributor becomes aware of the significant dealing.</p>

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to the Issuer via SupportHUB or via email at ddo@hub24.com.au. This email address should also be used to contact the Issuer regarding any details relating to this TMD.

DEFINITIONS

Term	Definition
Consumer's investment objective	
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.
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).

Consumers can refer to the PDS for the relevant Managed Portfolio option under the headings 'Investment Objective' or 'Investor Suitability' to find the investment objective that is applicable for that Managed Portfolio.

Consumer's intended product use (% of Investable Assets)

Standalone Solution (75-100%)	The consumer intends to hold the Managed Portfolio 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 Managed Portfolio 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 Managed Portfolio 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.

Portfolio diversification (for completing the key product attribute section of consumer's intended product use)

Term	Definition
Low	Single asset class, single country, low or moderate holdings of securities - e.g. high conviction Australian equities.
Medium	1-2 asset classes, single country, broad exposure within asset class, e.g. Australian 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).

Consumers can refer to the PDS for the relevant Managed Portfolio option under the headings 'Asset allocation' or 'Number of holdings' to understand the level of Portfolio diversification for that Managed Portfolio.

Consumer's intended investment timeframe

Short (≤ 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.

Consumers can refer to the PDS for the relevant Managed Portfolio option to find the minimum suggested timeframe that is applicable for that Managed Portfolio.

Consumer's Risk (ability to bear loss) and Return profile

The Standard Risk Measure (SRM) is a calculation of risk and potential loss based on industry guidance and allows members to compare investment options that are expected to deliver a similar number of negative annual returns over any 20 year period. The 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 or that a positive return could still be less than a consumer requires to meet their investment objectives/needs.

A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.

Low	<p>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.</p> <p>Consumer typically prefers defensive assets such as cash and fixed income.</p>
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Term	Definition
Medium	<p>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.</p> <p>Consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.</p>
High	<p>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.</p> <p>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.</p>
Very high	<p>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).</p> <p>Consumer typically prefers growth assets such as shares, property and alternative assets.</p>

Consumers can refer to the PDS for the relevant Managed Portfolio option to find the SRM that is applicable for that Managed Portfolio.

Investment Category Guidelines for Managed Portfolios within the HUB24 Managed Portfolio Service

Australian Large Cap	Managed portfolios which invest predominately in Australian Large Cap investments (ASX 50).
Australian Small and Mid Cap	Managed portfolios which invest predominately in Australian Mid and Small Cap investments (outside ASX 50).
Property and Infrastructure	<p>Managed portfolios which invest predominately in:</p> <ul style="list-style-type: none"> Listed property securities and/or direct property in Australia and around the world. Listed and/or direct infrastructure assets such as transport-related assets (toll roads, railways, ports and airports) and utilities (electricity, water and gas).
Fixed Income	Managed portfolios which invest predominately in either Australia or international fixed income investments.
International Equity	Managed portfolios which invest predominately in international investments.

Term	Definition
Multi Sector – Conservative	Managed portfolios which consist between 0% to 29% growth assets, based on long-term average target exposure. Included in this category are any multi-sector income or ESG focused funds which fit the above growth asset criteria.
Multi Sector – Moderately Conservative	Managed portfolios which consist between 30% to 49% growth assets, based on long-term average target exposure. Included in this category are any multi-sector income or ESG focused funds which fit the above growth asset criteria.
Multi Sector – Balanced	Managed portfolios which consist between 50% to 69% growth assets, based on long-term average target exposure. Included in this category are any multi-sector income or ESG focused funds which fit the above growth asset criteria.
Multi Sector – Growth	Managed portfolios which consist between 70% to 89% growth assets, based on long-term average target exposure. Included in this category are any multi-sector income or ESG focused funds which fit the above growth asset criteria.
Multi Sector – High Growth	Managed portfolios which consist between 90% to 100% growth assets, based on long-term average target exposure. Included in this category are any multi-sector income or ESG focused funds which fit the above growth asset criteria.
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 (if applicable).</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>

Term	Definition
	<ul style="list-style-type: none"> • the nature and risk profile of the product (which will be informed 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 intended investment amount, their intended product use or their ability to bear loss), and • the nature and extent of the inconsistency of distribution with the TMD. <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 this particular product over the reporting period, • the consumer's intended product use is not consistent with the intended product use described within the investment category that the Managed Portfolio option belongs to, or • the consumer's risk (ability to bear loss) and return profile is not consistent with the risk (ability to bear loss) and return profile described within the investment category that the Managed Portfolio option belongs to.