

# Grow Wrap Super and Pension Service

## Target Market Determination

This Target Market Determination (TMD) has been prepared and issued by OnePath Custodians Pty Limited (Trustee, OPC) (ABN 12 008 508 496, AFSL 238346, RSE L0000673), as the issuer of Grow Wrap Super and Pension Service, Unique Superannuation Identifier 61 808 189 263 180 (Grow Wrap Super Service); 61 808 189 263 181 (Grow Wrap Pension Service).

Grow Wrap Super and Pension Service (Grow Wrap) covers client retirement planning requirements and includes:

- Super Service: an accumulation superannuation solution, and
- Pension Service: offering both transition to retirement (TTR) pensions and a standard account-based pension.

Grow Wrap combines easy administration and transparent reporting across managed funds, Separately Managed Accounts (SMAs), term deposits, Australian Listed Securities and a cash account – all under the one umbrella.

### PART A - Super

#### Target Market Determination

Part A is the TMD for the Grow Wrap Super Service.

This TMD seeks to offer clients and distributors an understanding of the class of clients for which the Super Service has been designed, having regard to the objectives, financial situation and needs of the target market. It applies to the Grow Wrap product referred to in the Product Disclosure Statement (PDS) available at [wrapinvest.com.au](http://wrapinvest.com.au).

It is not a PDS and is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. This document does not take into account any person's individual objectives, financial situation or needs. Clients must refer to the PDS and any supplementary documents when making a decision about the product.

### Target Market

Suitable for clients who:	Not suitable for clients who:
<ul style="list-style-type: none"><li>• may be receiving personal financial advice</li><li>• seek a transparent fee structure, with the added flexibility to only pay for the investment management services they need</li><li>• like a wide range of investment choices</li><li>• prefer to be kept informed and involved in investment decisions</li><li>• may want the option of Death (including Terminal Illness) only cover, Death and Total and Permanent Disablement (TPD) cover and/or Income Protection (IP) cover in super (and meet the suitability criteria as described in the Insurance attributes section).</li></ul>	<ul style="list-style-type: none"><li>• do not have access to email or the internet</li><li>• are investing through a self-managed superannuation fund (SMSF)</li><li>• are looking for a default investment strategy (MySuper)</li><li>• need access to their investment capital before retirement</li><li>• are seeking automatic insurance cover without undergoing a health and medical assessment</li><li>• are seeking insurance cover but do not meet the suitability criteria as described in the Insurance attributes section.</li></ul>

## Likely Objectives, Financial Situation and Needs of Consumers in the Target Market

The Super Service has been designed for clients whose likely objectives, financial situation and needs are such that they:

- would like to have the option to move a super account to a pension account within the same super fund
- are looking for:
  - a super product that offers an extensive range of quality investments that can be tailored to meet financial objectives
  - a service that can be easily managed by clients and their financial adviser
  - online access to their account
  - may be looking for access to insurance cover options including Death and Total & Permanent Disablement cover or Income Protection Cover in Super (and meet the suitability criteria as described in the Eligibility requirements section of their preferred product).

**Please note:** While the product is designed to be used with a financial adviser, direct retail clients are not excluded from continuing to hold and transact on their account in the Super Service.

## Key Attributes

### Product attributes

The key product attributes of the Super Service are as follows:

- a suitably priced superannuation service
- an extensive range of quality investments, including managed funds, Separately Managed Accounts (SMAs), term deposits and Australian Listed Securities
- online access to their account details with simple, fast and accurate consolidated reporting
- a service that can be easily managed by clients and their financial adviser by tailoring their account to meet their financial objectives
- access to insurance cover options including Death and Total & Permanent Disablement cover or Income Protection Cover in Super (and meet the suitability criteria as described in the Eligibility requirements section of their preferred product).

### Investment attributes

Clients have a choice of investment options across 16 investment strategies depending on their investment objective, preference for risk and return and investment timeframe. The types of clients for whom the different categories of investment options are intended for are broadly described below.

An individual client, however, should have regard to the information provided in the PDS for this product before making an investment selection. The client may choose to invest in multiple options (with different characteristics) to meet their investment needs. Clients should speak to their financial adviser to determine which best suits their needs (where appropriate).

### Multi-sector

Provide a multi-asset portfolio of investments based on a particular risk profile by investing in a mix of defensive and growth assets. For example, investing with a bias to defensive assets in the moderate investment options and a bias to growth assets in the growth investment options.

Investment Strategy	Minimum Time Horizon	Investment Objective
Conservative Funds	2+ years	To provide a diverse range of multi-asset defensive orientated investment options that offer varied strategies aiming to achieve relatively stable returns through the investment cycles. This can be delivered by investing in a range of mainly defensive and few growth assets, with a low level of volatility.
Moderate Funds	3+ years	To provide a diverse range of multi-asset defensive orientated investment options that offer varied strategies aiming to achieve a higher return than the conservative strategy through the investment cycles. This can be delivered by investing in a range of mainly defensive and some growth assets, with a medium level of volatility and the possibility of negative returns over short periods.
Balanced Funds	5+ years	To provide a diverse range of multi asset balanced orientated investment options that offer varied strategies aiming to achieve a higher return than the moderate strategy through the investment cycles. This can be delivered by investing in a balanced exposure to growth and defensive assets with a medium to high level of volatility and the possibility of negative returns over short periods.
Growth Funds	7+ years	To provide a diverse range of multi asset growth orientated investment options that offer varied strategies aiming to achieve a higher return than the balanced strategy through the investment cycles. This can be delivered through a diversified portfolio of mainly growth assets and some defensive assets with a high level of volatility and the possibility of negative returns over short periods.

Investment Strategy	Minimum Time Horizon	Investment Objective
High Growth Funds	7+ years	To provide a diverse range of multi asset growth orientated investment options that offer varied strategies aiming to achieve a higher return than the growth strategy through the investment cycles. This can be delivered through exposure to mainly growth assets with the possibility of greater volatility and the possibility of negative returns over short periods.

### Single sector

Allow clients and their adviser to construct their own investment portfolio from a wide range of single asset class investment options. Investing into a single asset class can expose clients to additional risks.

Investment Strategy	Minimum Time Horizon	Investment Objective
Cash Funds	No minimum	To provide a secure return that is consistent with the prevailing market cash rate over any time frame with minimal risk of capital loss. This can be delivered through exposure to assets that are predominantly cash and cash equivalents.
Term Deposits	Agreed term	To provide an agreed rate of return for an agreed term.
Australian Fixed Interest Funds	4+ years	To provide a diverse range of Australian fixed interest investment options that offer varied investment strategies aiming to achieve a return in excess of the cash rate through the investment cycles. This can be delivered through investing in a variety of Australian fixed interest securities. The higher return potential comes with higher short-term volatility of returns.
International Fixed Interest Funds	4+ years	To provide a diverse range of international fixed interest investment options that offer varied investment strategies aiming to achieve a return in excess of the cash rate through the investment cycles. This can be delivered through investing in a variety of international fixed interest securities. The higher return potential comes with higher short-term volatility of returns.
Diversified Fixed Interest Funds	4+ years	To provide a diverse range of fixed interest investment options that offer varied investment strategies aiming to achieve a return in excess of the cash rate through the investment cycles. This can be delivered through investing in a variety of Australian and international fixed interest securities. The higher return potential comes with higher short-term volatility of returns.
Diversified Credit / Hybrid Income Funds	5+ years	To provide a diverse range of global credit and hybrid income investment options that offer varied investment strategies aiming to achieve a higher return than the cash rate and traditional fixed interest securities through the investment cycles. This can be delivered through investing in a variety of diversified global credit and hybrid income securities. The higher return comes with higher short-term volatility of returns.
Alternative Funds <sup>1</sup>	5+ years	To provide a diverse range of alternative investment options that offer varied investment strategies aiming to achieve moderate absolute returns with lower correlation to traditional assets (in a risk adjusted manner) through the investment cycles. This can be delivered through investing in a wide range of alternative investment strategies.
Australian Property Funds	7+ years	To provide a diverse range of Australian property investment options that offer varied investment styles aiming to achieve a higher return than cash and fixed interest securities through the investment cycles. This can be delivered through investing in a variety of Australian listed and unlisted property and property related assets. The higher return potential comes with higher short-term volatility of returns.
International Property Funds	7+ years	To provide a diverse range of international property investment options that offer varied investment styles aiming to achieve a higher return than cash and fixed interest securities through the investment cycles. This can be delivered through investing in a variety of international listed and unlisted property and property related assets. The higher return potential comes with higher short-term volatility of returns.

Investment Strategy	Minimum Time Horizon	Investment Objective
Australian Share Funds <sup>2</sup>	7+ years	To provide a diverse range of Australian share investment options that offer varied investment styles aiming to achieve a higher return than fixed interest and property securities through the investment cycles. This can be delivered through investing in a variety of Australian listed or soon to be listed companies. The higher return potential comes with higher short-term volatility of returns.
International Share Funds <sup>3</sup>	7+ years	To provide a diverse range of international share investment options that offer varied investment styles aiming to achieve a higher return than fixed interest and property securities through the investment cycles. This can be delivered through investing in a variety of international companies primarily listed on stock exchanges across global share markets. The higher return potential comes with higher short-term volatility of returns.
Australian Listed Securities <sup>4</sup>	7+ years	To provide a diverse range of Australian listed securities that offer varied strategies aiming to achieve higher returns than fixed interest and property through the investment cycles. This can be delivered through investing in a variety of Australian listed companies. The higher return potential comes with higher short-term volatility of returns.

1 Includes funds that provide exposure to private equity/debt securities, foreign exchange, financial derivatives (e.g. futures, options, gearing), commodities/resources, unlisted infrastructure/property assets and leveraged products including collateralised debt obligation (CDO) and collateralised loan obligation (CLO) securities.

2 Includes funds that provide exposure to high yield, ethical, geared, smaller companies and specialist investment strategies (including concentrated, gearing, short selling and derivative trading).

3 Includes funds that provide exposure to hedged, unhedged, regional, emerging / frontier markets, infrastructure, smaller companies and specialist investment strategies (including concentrated, gearing, short selling and derivative trading).

4 Access a wide range of Australian listed securities including Exchange Traded Funds, Exchange Traded Commodities, Exchange Traded Managed Funds, Listed Investment Companies and Preference Shares.

### Insurance attributes

Clients who have a financial adviser and want the convenience of retail insurance cover through their super can access the following types of retail insurance cover issued by Zurich Australia Limited through the OneCare insurance product, subject to meeting eligibility and underwriting requirements:

- Life Cover designed to provide financial protection for a personal consumer who has or expects to have dependants and wants to continue providing financial support for their dependants in the event of death or terminal illness diagnosis.
- Total and Permanent Disability (TPD) Cover that pays a lump sum if the life insured suffers a permanent disability that meets the selected or allocated TPD definition. A life insured's TPD Cover can be supplemented with cover outside of superannuation.
- Income Secure Cover that provides a monthly benefit if the life insured is unable to work solely due to an illness or injury that causes ongoing restricted capacity for longer than the waiting period. Income Secure Cover replaces some lost income, so that the life insured can concentrate on recovery without having to worry about how to cover ongoing expenses.
- Extra Care Cover designed for consumers who want additional Death cover which is limited to death resulting from an accident only (Accidental Death Cover) and/or additional Terminal Illness cover.

OneCare insurance cover is subject to individual underwriting and clients may be ineligible for cover if they do not meet the eligibility criteria. Please refer to the OneCare PDS and TMD for specific details. Factors that may generally impact eligibility include:

- age;
- employment status;
- occupation; and
- residency status.

Other OneCare insurance specific benefit exclusions may apply and are set out in the OneCare PDS. These will apply in addition to individual exclusions or restrictions the insurer may apply as a condition of acceptance of cover.

Clients should consider the OneCare PDS and TMD for further information and obtain advice from their financial adviser.

## Appropriateness of the target market

This product should be consistent with the likely objectives, financial situation and needs of the class of clients in the target market. This is based on an analysis that the key features and attributes of the Super Service:

- have previously benefited target market clients in the past and continues to do so; and
- fulfil a need for clients who are looking for a service that can be easily managed by them and their financial adviser, offers an extensive range of quality investments and can be accessed online.

The Super Service TMD will be reviewed as specified below to ensure it continues to be suitable for clients in the target market.

## Distribution Channels

This product can be distributed through financial advisers and via direct retail\*.



Direct Retail



Financial Adviser

## Distribution Conditions

\*Direct retail clients can only join via a trustee-initiated transfer.

This product can only be distributed upon receipt of a completed application form that meets all eligibility criteria.

## Appropriateness of distribution conditions

The distribution conditions and restrictions will make it likely that clients who purchase the product are in the class of clients for which the Super Service has been designed given the distribution conditions and restrictions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

## Review Period and triggers

Review period	
Issue date	1 June 2024
Version	5
Periodic review	This TMD will be reviewed at least annually and will be updated as and when appropriate.
Review triggers	
<p>The following events and circumstances would reasonably suggest the TMD should be reviewed to determine if it is no longer appropriate:</p> <ul style="list-style-type: none"> <li>• material changes to key product attributes and the terms and conditions of the product including the insurance offered through the product</li> <li>• the issuer determines via its member outcomes assessment that the financial interests of the client are not being promoted</li> <li>• significant dealing outside the TMD</li> <li>• material or unexpectedly high number of complaints about the product including in respect to the insurance offered through the product</li> <li>• the use of 'product intervention powers', regulator orders or directions that affect the product</li> <li>• regulatory changes that have a significant impact on the attributes of the product</li> <li>• a significant number of clients exiting the product</li> <li>• material change in the following metrics in relation to insurance held through the product: <ul style="list-style-type: none"> <li>– size or demographics of the insured membership (including the proportion of insured members in the fund and impacts due to lapses and cancellations)</li> <li>– the average claims handling time</li> <li>– the proportion of premiums returned to members as benefits, or</li> <li>– the proportion of insurance claims being declined or withdrawn</li> </ul> </li> <li>• the insurer makes a material change to the insurance product terms or the premium rates</li> </ul>	

## Distributor Reporting

### Significant Dealings Reporting

Distributors are required to notify the issuer if they become aware of a significant dealing in the product that is not consistent with the TMD.

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.

Dealings outside this TMD may be significant because:

- 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 client (or class of client).

In each case, the distributor should have regard to:

- the actual or potential harm to a client,
- the nature and extent of the inconsistency of distribution with the TMD (including an explanation of why the dealings occurred outside the target market),
- the date range of when the significant dealing occurred,
- the number of clients impacted by the significant dealing (i.e. the number of clients who are not in the target market (or who have been excluded from the target market) as a proportion of all clients who have acquired the product), and
- the time period in which these acquisitions outside the target market occurred.

The reporting period is as soon as practicable but no later than 10 business days after becoming aware of the significant dealing.

### Complaints Reporting

The distributor will provide details of the number and nature of complaints relating to product design, product availability and distribution, having regard to privacy.

The distributor should provide details as soon as practicable but no later than 10 business days following the end of the calendar quarter.

### Contact details for distributors

Contact details and reporting instructions are available at [ddo.ioof.com.au](http://ddo.ioof.com.au)

You can also email us at [ddo@insigniafinancial.com.au](mailto:ddo@insigniafinancial.com.au) using the FSC standard template.

## PART B - Pension

### Target Market Determination

Part B is the TMD for the Grow Wrap Pension Service.

This TMD seeks to offer clients and the distributor an understanding of the class of clients for which the Pension Service has been designed, having regard to the objectives, financial situation and needs of the target market. It applies to the Grow Wrap product referred to in the Product Disclosure Statement (PDS) available at [wrapinvest.com.au](http://wrapinvest.com.au).

It is not a PDS and is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. This document does not take into account any person's individual objectives, financial situation or needs. Clients must refer to the PDS and any supplementary documents when making a decision about the product.

### Target Market

Suitable for clients who:	Not suitable for clients who:
<ul style="list-style-type: none"> <li>• may be receiving personal financial advice</li> <li>• seek a transparent fee structure, with the added flexibility to only pay for the investment management services they need</li> <li>• like a wide range of investment choices</li> <li>• prefer to be kept informed and involved in investment decisions.</li> </ul>	<ul style="list-style-type: none"> <li>• do not have access to email or the internet</li> <li>• are looking for a default investment strategy (MySuper)</li> <li>• have not satisfied a relevant condition of release</li> <li>• wish to hold insurance through their pension account.</li> </ul>

### Likely Objectives, Financial Situation and Needs of Consumers in the Target Market

The Pension Service has been designed for clients whose likely objectives, financial situation and needs are such that they are:

- retired or have otherwise met a condition of release (and want to draw an income from super)
- looking for:
  - a service that can be easily managed by clients and their financial adviser
  - access to an extensive range of quality investments that can be tailored to meet financial objectives
  - online access to their account.

**Please note:** While the product is designed to be used with a financial adviser, direct retail clients are not excluded from continuing to hold and transact on their account in the Pension Service.

### Key Attributes

#### Product attributes

The key product attributes of the Pension Service are as follows:

- a suitably priced pension service
- an extensive range of quality investments, including managed funds, Separately Managed Accounts (SMAs), term deposits and Australian Listed Securities
- online access to their account details with simple, fast and accurate consolidated reporting
- a service that can be easily managed by clients and their financial adviser by tailoring their account to meet their financial objectives

#### Investment attributes

Clients have a choice of investment options across 16 investment strategies depending on their investment objective, preference for risk and return and investment timeframe. The types of clients for whom the different categories of investment options are intended for are broadly described below.

An individual client, however, should have regard to the information provided in the PDS for this product before making an investment selection. The client may choose to invest in multiple options (with different characteristics) to meet their investment needs. Clients should speak to their financial adviser to determine which best suits their needs (where appropriate).

### Multi-sector

Provide a multi-asset portfolio of investments based on a particular risk profile by investing in a mix of defensive and growth assets. For example, investing with a bias to defensive assets in the moderate investment options and a bias to growth assets in the growth investment options.

Investment Strategy	Minimum Time Horizon	Investment Objective
Conservative Funds	2+ years	To provide a diverse range of multi-asset defensive orientated investment options that offer varied strategies aiming to achieve relatively stable returns through the investment cycles. This can be delivered by investing in a range of mainly defensive and few growth assets, with a low level of volatility.
Moderate Funds	3+ years	To provide a diverse range of multi-asset defensive orientated investment options that offer varied strategies aiming to achieve a higher return than the conservative strategy through the investment cycles. This can be delivered by investing in a range of mainly defensive and some growth assets, with a medium level of volatility and the possibility of negative returns over short periods.
Balanced Funds	5+ years	To provide a diverse range of multi asset balanced orientated investment options that offer varied strategies aiming to achieve a higher return than the moderate strategy through the investment cycles. This can be delivered by investing in a balanced exposure to growth and defensive assets with a medium to high level of volatility and the possibility of negative returns over short periods.
Growth Funds	7+ years	To provide a diverse range of multi asset growth orientated investment options that offer varied strategies aiming to achieve a higher return than the balanced strategy through the investment cycles. This can be delivered through a diversified portfolio of mainly growth assets and some defensive assets with a high level of volatility and the possibility of negative returns over short periods.
High Growth Funds	7+ years	To provide a diverse range of multi asset growth orientated investment options that offer varied strategies aiming to achieve a higher return than the growth strategy through the investment cycles. This can be delivered through exposure to mainly growth assets with the possibility of greater volatility and the possibility of negative returns over short periods.

### Single sector

Allow clients and their adviser to construct their own investment portfolio from a wide range of single asset class investment options. Investing into a single asset class can expose clients to additional risks.

Investment Strategy	Minimum Time Horizon	Investment Objective
Cash Funds	No minimum	To provide a secure return that is consistent with the prevailing market cash rate over any time frame with minimal risk of capital loss. This can be delivered through exposure to assets that are predominantly cash and cash equivalents.
Term Deposits	Agreed term	To provide an agreed rate of return for an agreed term.
Australian Fixed Interest Funds	4+ years	To provide a diverse range of Australian fixed interest investment options that offer varied investment strategies aiming to achieve a return in excess of the cash rate through the investment cycles. This can be delivered through investing in a variety of Australian fixed interest securities. The higher return potential comes with higher short-term volatility of returns.
International Fixed Interest Funds	4+ years	To provide a diverse range of international fixed interest investment options that offer varied investment strategies aiming to achieve a return in excess of the cash rate through the investment cycles. This can be delivered through investing in a variety of international fixed interest securities. The higher return potential comes with higher short-term volatility of returns.
Diversified Fixed Interest Funds	4+ years	To provide a diverse range of fixed interest investment options that offer varied investment strategies aiming to achieve a return in excess of the cash rate through the investment cycles. This can be delivered through investing in a variety of Australian and international fixed interest securities. The higher return potential comes with higher short-term volatility of returns.



Investment Strategy	Minimum Time Horizon	Investment Objective
Diversified Credit / Hybrid Income Funds	5+ years	To provide a diverse range of global credit and hybrid income investment options that offer varied investment strategies aiming to achieve a higher return than the cash rate and traditional fixed interest securities through the investment cycles. This can be delivered through investing in a variety of diversified global credit and hybrid income securities. The higher return comes with higher short-term volatility of returns.
Alternative Funds <sup>1</sup>	5+ years	To provide a diverse range of alternative investment options that offer varied investment strategies aiming to achieve moderate absolute returns with lower correlation to traditional assets (in a risk adjusted manner) through the investment cycles. This can be delivered through investing in a wide range of alternative investment strategies.
Australian Property Funds	7+ years	To provide a diverse range of Australian property investment options that offer varied investment styles aiming to achieve a higher return than cash and fixed interest securities through the investment cycles. This can be delivered through investing in a variety of Australian listed and unlisted property and property related assets. The higher return potential comes with higher short-term volatility of returns.
International Property Funds	7+ years	To provide a diverse range of international property investment options that offer varied investment styles aiming to achieve a higher return than cash and fixed interest securities through the investment cycles. This can be delivered through investing in a variety of international listed and unlisted property and property related assets. The higher return potential comes with higher short-term volatility of returns.
Australian Share Funds <sup>2</sup>	7+ years	To provide a diverse range of Australian share investment options that offer varied investment styles aiming to achieve a higher return than fixed interest and property securities through the investment cycles. This can be delivered through investing in a variety of Australian listed or soon to be listed companies. The higher return potential comes with higher short-term volatility of returns.
International Share Funds <sup>3</sup>	7+ years	To provide a diverse range of international share investment options that offer varied investment styles aiming to achieve a higher return than fixed interest and property securities through the investment cycles. This can be delivered through investing in a variety of international companies primarily listed on stock exchanges across global share markets. The higher return potential comes with higher short-term volatility of returns.
Australian Listed Securities <sup>4</sup>	7+ years	To provide a diverse range of Australian listed securities that offer varied strategies aiming to achieve higher returns than fixed interest and property through the investment cycles. This can be delivered through investing in a variety of Australian listed companies. The higher return potential comes with higher short-term volatility of returns.

- 1 Includes funds that provide exposure to private equity/debt securities, foreign exchange, financial derivatives (e.g. futures, options, gearing), commodities/resources, unlisted infrastructure/property assets and leveraged products including collateralised debt obligation (CDO) and collateralised loan obligation (CLO) securities.
- 2 Includes funds that provide exposure to high yield, ethical, geared, smaller companies and specialist investment strategies (including concentrated, gearing, short selling and derivative trading).
- 3 Includes funds that provide exposure to hedged, unhedged, regional, emerging / frontier markets, infrastructure, smaller companies and specialist investment strategies (including concentrated, gearing, short selling and derivative trading).
- 4 Access a wide range of Australian listed securities including Exchange Traded Funds, Exchange Traded Commodities, Exchange Traded Managed Funds, Listed Investment Companies and Preference Shares.

### Appropriateness of the target market

This product should be consistent with the likely objectives, financial situation and needs of the class of clients in the target market. This is based on an analysis that the key features and attributes of the Pension Service:

- have previously benefited target market clients in the past and continues to do so; and
- fulfil a need for clients who are looking for a service that can be easily managed by them and their financial adviser, offers an extensive range of quality investments and can be accessed online.

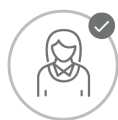
The Pension Service TMD will be reviewed as specified below to ensure it continues to be suitable for clients in the target market.

## Distribution Channels

This product can be distributed through financial advisers and via direct retail\*.



Direct Retail



Financial Adviser

## Distribution Conditions

\*Direct retail clients can only join via a trustee-initiated transfer.

This product can only be distributed upon receipt of a completed application form that meets all eligibility criteria.

## Appropriateness of distribution conditions

The distribution conditions and restrictions will make it likely that clients who purchase the product are in the class of clients for which the Pension Service has been designed given the distribution conditions and restrictions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

## Review Period and triggers

Review period	
Issue date	1 June 2024
Version	5
Periodic review	This TMD will be reviewed at least annually and will be updated as and when appropriate.
Review triggers	
<p>The following events and circumstances would reasonably suggest the TMD should be reviewed to determine if it is no longer appropriate:</p> <ul style="list-style-type: none"> <li>material changes to key product attributes and the terms and conditions of the product</li> <li>the issuer determines via its member outcomes assessment that the financial interests of the client are not being promoted</li> <li>significant dealing outside the TMD</li> <li>material or unexpectedly high number of complaints about the product</li> <li>the use of 'product intervention powers', regulator orders or directions that affect the product</li> <li>regulatory changes that have a significant impact on the attributes of the product</li> <li>significant number of clients exiting the product</li> </ul>	

## Distributor Reporting

### Significant Dealings Reporting

Distributors are required to notify the issuer if they become aware of a significant dealing in the product that is not consistent with the TMD.

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.

Dealings outside this TMD may be significant because:

- 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 client (or class of client).

In each case, the distributor should have regard to:

- the actual or potential harm to a client,
- the nature and extent of the inconsistency of distribution with the TMD (including an explanation of why the dealings occurred outside the target market),
- the date range of when the significant dealing occurred,

- the number of clients impacted by the significant dealing (i.e. the number of clients who are not in the target market (or who have been excluded from the target market) as a proportion of all clients who have acquired the product), and
- the time period in which these acquisitions outside the target market occurred.

The reporting period is as soon as practicable but no later than 10 business days after becoming aware of the significant dealing.

### **Complaints Reporting**

The distributor will provide details of the number and nature of complaints relating to product design, product availability and distribution, having regard to privacy.

The distributor should provide details as soon as practicable but no later than 10 business days following the end of the calendar quarter.

### **Contact details for distributors**

Contact details and reporting instructions are available at [ddo.ioof.com.au](http://ddo.ioof.com.au)

You can also email us at [ddo@insigniafinancial.com.au](mailto:ddo@insigniafinancial.com.au) using the FSC standard template.

OnePath Custodians Pty Limited (OPC) (ABN 12 008 508 496, AFSL 238346, RSE L0000673) is the Trustee of the Retirement Portfolio Service (RPS) (ABN 61 808 189 263) and Grow Wrap Super and Pension Service is part of the RPS.

The information in this TMD is of a general nature only and has been prepared without taking into account your objectives, financial situation or needs. Before making a decision based on this information, you should consider the appropriateness of the information, having regard to your objectives, financial situation and needs.

OPC is part of the Insignia Financial Group of companies comprising Insignia Financial Holdings Ltd (ABN 49 100 103 722) and its related bodies corporate (Insignia Financial Group).

An investment with OPC is subject to investment risk, including possible delays in repayment and loss of income and principal invested. Past performance is not an indication of future performance. The repayment of capital, the performance or any rate of return of an investment with OPC is not guaranteed by any member of the Insignia Financial Group or any other related or associated company.