

# Target Market Determination

## Russell Investments GSS Active 70/30 Fund

APIR code NET0013AU | ARSN 150 915 816

30 August 2024

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**Issuer/responsible entity:**

Netwealth Investments  
Limited

ABN 85 090 569 109  
AFSL 230975

## About this document

This Target Market Determination ('TMD') for the **Russell Investments GSS Active 70/30 Fund** ('Fund'), is issued by Netwealth Investments Limited ABN 85 090 569 109, AFSL 230975. This TMD seeks to provide distributors with an understanding of the class of consumers for which the Fund has been designed. This document is not a summary of the product features or terms of the Fund. The information in this document is general advice only, and the TMD has been prepared without taking into account any persons' objectives, financial situation or needs. Persons interested in acquiring this product should read the Product Disclosure Statement ('PDS') for the Fund before making a decision whether to buy this product.

Important terms used in this TMD are defined in the **TMD Definitions** document which supplement this document. The PDS and the TMD Definitions document can be obtained on our website [netwealth.com.au](http://netwealth.com.au).

## Description of target market

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.

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



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

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

## Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (typically with an intended product use of satellite/small allocation or core component). 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 conservative portfolio with a satellite/small allocation to growth assets. In this case, it may be likely that a product with a High or Very High risk/return profile is consistent with the consumer's objectives for that allocation notwithstanding that the risk/return profile of the consumer as a whole is Low or Medium. In making this assessment, distributors should consider all features of a product (including its key attributes).

## Consumer attributes

### Target market summary

This product is likely to be appropriate for a consumer seeking **capital growth**. The Fund is highly diversified and designed for a consumer with a minimum 6 year investment timeframe and **high** risk/return profile.

Consumer's investment objective	TMD Indicator	Product description including key attributes
Capital Growth	●	The investment strategy of the Fund is to invest in a mix of assets across various traditional and alternative asset classes, with a neutral exposure of 70% to growth assets such as shares, property and alternative investments and 30% exposure to defensive assets such as cash and fixed interest. Asset class exposures are actively managed as the manager seeks to protect against risk or benefit from investment opportunities. The Fund invests in income-generating assets and any distributions are generally determined at the end of each calendar quarter.  The investment return objective of the Fund is to generate a rate of return that exceeds the Consumer Price Index by at least 3.5% per annum over rolling 7-year periods.
Capital Preservation	●	
Income Distribution	●	
Consumer's intended product use	TMD Indicator	Product description including key attributes
Whole portfolio (up to 100%)	●	The Fund has <b>very high</b> portfolio diversification across multiple asset classes, investment strategies, investment managers and styles.
Major allocation (up to 75%)	●	
Core allocation (up to 50%)	●	
Minor allocation (up to 25%)	●	
Satellite allocation (up to 10%)	●	
Consumer's investment timeframe	TMD Indicator	Product description including key attributes
Minimum investment timeframe	6 Years	The minimum suggested investment timeframe for holding the Fund is 6 years.
Consumer's Risk (ability to bear loss) and Return profile	TMD Indicator	Product description including key attributes
Very high	●	Netwealth estimates negative annual returns in 4- 6 years out of every 20 years. The Fund has a diversified allocation across asset classes and exposure to defensive assets.
High	●	
Medium	●	
Low	●	

Consumer's need to access capital	TMD Indicator	Product description including key attributes
Within one week of request	●	Under normal circumstances, withdrawal requests may be made on any business day and normally processed from the Fund to a platform cash account within three business days from receipt of a withdrawal request.  In the event that most of the Fund's investment in an Underlying Fund or Underlying Funds cannot be withdrawn, there would be a freeze on withdrawals from the Fund and the ability to withdraw within the usual period would be suspended. Given the nature of the investments, this is unlikely to occur except in very unusual circumstances.
Within one month of request	●	
Within three months of request	●	
Within one year of request	●	

## Appropriateness

Netwealth 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. Netwealth has formed this view as the features of this product in the 'Product description including key attributes' sections are likely to be suitable for consumers with the attributes identified with a green TMD Indicator.

### Distribution conditions/restrictions:

All prospective consumers must receive the Product Disclosure Statement in Australia.

Distribution Condition	Distribution Condition Rationale
<p>Only available for distribution by:</p> <ul style="list-style-type: none"> <li>Netwealth Investments Limited; or</li> <li>Financial advisers and AFS Licensees who have an agreement with Netwealth through the Netwealth Wrap Service and the Netwealth Superannuation Master Fund.</li> </ul>	<p>These distributors are regulated financial service providers and AFSL holders and have the competence, resources and internal controls to distribute the product in a manner consistent with the TMD.</p>

## Review triggers

Any one or more of the following events and circumstances will trigger a review of this TMD:

1. Material change to key attributes, fund investment objective and/or fees.
2. Material deviation from benchmark / objective over sustained period.
3. Key attributes have not performed as disclosed by a material degree and for a material period.
4. Determination by Netwealth that there has been a reportable significant dealing in the Fund.
5. Material or unexpectedly high number of complaints about the product or distribution of the product.
6. Material actions by regulators in relation to deficiencies in the product or its distribution.

## Mandatory review periods

Review period	Maximum period for completion of review
Date from which this TMD is effective	30 August 2024
Subsequent review	1 year and 3 months from the effective date of the revised TMD.
The next scheduled review of this TMD will be completed by	30 November 2025

## Distributor reporting requirements

Reporting requirement	Reporting period	Which distributors this requirement applies to
<ul style="list-style-type: none"> <li><b>Complaints</b> (as defined in section 994A(1) of the Act) relating to the product. The distributor must provide full details of each complaint received (including Account Number, if relevant).</li> </ul>	As soon as reasonably practicable, but in any event within 10 business days following end of calendar quarter	AFS Licensees who engage in retail product distribution in relation to the product.
<p><b>Significant dealing</b> outside of target market, under s994F(6) of the Act. See TMD Definitions for further detail.</p>	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	AFS Licensees who engage in retail distribution in relation to the product

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Information on the FSC data standards is available at <https://www.fsc.org.au/resources/target-market-determination-templates>. Distributors can report complaints by emailing [complaints@netwealth.com.au](mailto:complaints@netwealth.com.au). Issued by Netwealth Investments Limited ABN 85 090 569 109 AFSL 230975 (Issuer). Netwealth is the responsible entity and issuer of units in the managed investment scheme referred to in this TMD. This TMD provides general information only and does not take into account your individual objectives, financial situation, needs or circumstances. Before making any investment decision, you should assess whether the material is appropriate for you and read the PDS, available at [netwealth.com.au](http://netwealth.com.au). Consider obtaining financial advice tailored to you having regard to your individual objectives, financial situation, needs and circumstances. This material is not a financial product recommendation or an offer or solicitation with respect to the purchase or sale of any financial product in any jurisdiction.

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