



Super Simplifier

Target Market Determination

For Super Simplifier (the Fund) a Division of the DIY Master Plan, Superannuation Product

Issued by Diversa Trustees Limited ABN 49 006 421 638, AFSL 235153, RSEL L0000635

1. 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 Diversa Trustees Limited (ABN 49 006 421 638) (Trustee) 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 this product should carefully read the Product Disclosure Statement (PDS) for Super Simplifier 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 from your Financial Adviser or via www.supersimplifier.com.au

Product Disclosure Statement to which this target market determination applies

This TMD applies to the Super Simplifier referred to in the following Product Disclosure Statement, Member Guide and Application Form <https://supersimplifier.com.au/documents/>

Other documents to which this target market determination applies

This TMD applies to the Super Simplifier referred to in the following relevant documents:

- Super Simplifier Approved Product List in the PDS and Member Guide <https://supersimplifier.com.au/documents/>
- Super Simplifier Managed Funds Approved Product List <https://supersimplifier.com.au/documents/>

2. Important dates

Date from which this target market determination is effective	5 October 2021
Date when this target market determination was last reviewed	5 October 2021
Date when this target market determination will be next reviewed	1 November 2022

3. Class of consumers that fall within this target market

The information below summarises the overall class of consumers that fall within the target market for Super Simplifier.

Super Simplifier is designed for consumers who:

- are eligible to contribute to a superannuation fund of their choice;
- are receiving personal financial advice from a licensed financial adviser authorised to provide advice on Super Simplifier;
- have any one or more of the following short term and long-term objectives:
 - to accumulate capital/wealth for retirement
 - to hold capital/wealth during retirement
 - to provide a source of income during retirement
 - to provide an environment for concessional taxation of savings;
- at any life stage who are over the age of 18 but have not yet reached retirement age, who typically have a superannuation balance of \$5,000 or more and are able to meet any minimum holding requirements for the investments and insurances which they may wish to acquire in superannuation on the recommendation of their financial adviser;
- seek more transparency over the investments held in their superannuation;
- wish to access to the following type of products on the investment menu in implementing personal financial advice from the consumer's financial adviser, which may or may not be included in a model portfolio:
 - ASX listed Australian shares;
 - ASX listed Exchange Traded Funds (ETFs) and Exchange Traded Commodities (ETCs);
 - ASX listed hybrid securities and bonds;
 - Listed investment companies (LICs);
 - ASX listed real estate investment trusts (A-REITs);
 - Registered managed investment schemes (including hedge funds and cash management trusts); and
 - Deposits with an Australian deposit-taking institution (term deposits and at call accounts); and
- to hold of a diversified range of investment options from an approved product list; and
- wish to gain access to death cover, total and permanent disability insurance (either separately or jointly with death cover) and income protection cover to assist the consumer with financial or financial-in-kind commitments that will not otherwise be satisfied in the event of death or terminal illness, total and permanent disability or other disability in retail insurance policies that will be approved by the Trustee.

Super Simplifier is **not** designed for consumers who:

- are not able to choose the superannuation fund to which their superannuation contributions can be made;
- are not receiving personal financial advice from a financial adviser that is authorised to advise on Super Simplifier;
- cannot roll over more than \$5,000 in order to establish their superannuation account balance;
- are not engaged with their superannuation or wish to manage their superannuation without any financial advice;
- want a self-managed superannuation fund (SMSF);
- do not seek transparency over the investments held in their superannuation;
- require a group life insurance policy or have specific insurance requirements that cannot be supported through a retail insurance policy arrangement or in products that will not be approved by the Trustee.

Product description and key attributes

The key eligibility requirements and product attributes of Super Simplifier are:

- the consumer is eligible to contribute to a superannuation fund of their choice;
- the consumer is receiving personal financial advice from a financial adviser authorised to provide advice on Super Simplifier;
- the consumer understands preservation rules which define that amounts saved into superannuation cannot be withdrawn until retirement except in certain permitted scenarios;
- access to range of investment options/choices to enable a consumer to determine the investments for their superannuation portfolio according to the risk profile of the consumer and objectives, needs and circumstances of the consumer, in conjunction with a financial adviser;
- the ability for a financial adviser to determine an appropriate model portfolio suitable for the consumer and to manage this portfolio for the consumer;
- an approved product list consisting of investments including Australian shares, ASX listed Exchange Traded Fund (ETFs), ASX listed Exchange Traded Commodities (ETCs), ASX listed hybrid securities and bonds, Listed Investment Companies (LICs), ASX listed Real Estate Investment trusts (REITs), managed funds registered by ASIC (including hedge funds and cash management trusts);
- the requirement for a Cash Management Account (CMA), stockbroking account with an approved stockbroker, account with an approved term deposit provider and a uXchange account (an investment administration platform that allows Members to purchase and sell investments in unlisted managed funds, record and facilitate the payment of distributions from underlying managed funds to the consumers linked CMA and provides holding, transaction and distribution reporting);
- visibility/transparency of all portfolio holdings;
- a technology-enabled interface which allows the consumer's financial adviser to process transactions effectively and for the consumer to view the transactions and their portfolio valuation online;
- access to death cover only (including terminal illness cover), Death and Total and Permanent Disability (TPD) cover and income protection insurance in retail policies that must be approved by the Trustee.

Objectives, financial situation, and needs

Consumers will be able to select investments from an approved product list in consultation with their financial adviser, which is incorporated into the personal financial advice provided to the consumer by their financial adviser. The investment options available on the approved product list have differing characteristics which will affect whether the investment option is suitable for that individual consumer. The suitability of the investment option for the consumer will be assessed by the financial adviser as part of the process of giving personal financial advice.

The table below sets out the types of investments available to consumers in the broader market and their suitability for the class of customers Super Simplifier has been designed for. The TMD Suitability column below uses a red/ amber/ green rating methodology with appropriate colour coding.

In target market	Potentially in target market	Not considered in target market
Consumer Investment Need	TMD Suitability	
Cash Management Account		
Term deposit options with maturity dates within 31 days		
ASX listed securities including Exchange Traded Funds, Exchange Trade Commodities, Listed Investment Companies and Real Estate Investment Trusts (A-REITs)		

ASX listed hybrid securities and bonds	Green
Registered managed investment schemes	Green
Separately managed accounts	Red
Model portfolios comprising the above types of products and within Approved Product List Holding Limits	Red
Other investment options including instalment warrants, investment restricted to wholesale investors and capital guaranteed options	Red
Term deposit options with maturity dates beyond 31 days	Red
Longevity product options	Red
Capital guarantee options	Red

Consumers will be able to access retail insurance policies in consultation with their financial adviser, which is incorporated into the personal financial advice provided to the consumer by their financial adviser. Any policy to be implemented will also require the approval of the Trustee. The insurance options available have differing characteristics which will affect whether the insurance is suitable for that individual consumer. The suitability of the insurance for the consumer will be assessed by the financial adviser as part of the process of giving personal financial advice.

The table below sets out the types of insurance and their suitability for the class of customers Super Simplifier has been designed for. The TMD Suitability column below uses a red/ amber/ green rating methodology with appropriate colour coding.

In target market	Potentially in target market	Not considered in target market
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Consumer Insurance Need	TMD Suitability
Life Cover Group Policy	Yellow
Total and Permanent Disability Cover Group Policy	Yellow
Income Protection Group Policy	Yellow
Life Cover Retail Policy	Green
Total and Permanent Disability Cover Retail Policy	Green
Income Protection Retail Policy	Green

Consistency between target market and the product

This is based on an analysis of the key terms, features and attributes of the product and a finding that these are consistent with the identified class of consumers. This includes consideration of expected increases in the cost of products and whether the target market is appropriate if product costs increase.

4. How this product is to be distributed

Distribution channels

This product is designed to be distributed online through financial advisers approved to use Super Simplifier.

Distribution conditions

This product should only be distributed under the following circumstances:

- a consumer must receive and continue to receive personal advice from a financial adviser (or otherwise authorised by an AFS licensee) to provide financial product advice and dealing services in respect of the product
- the product may be distributed under a robo-advised model where a consumer receives and continue to receive personal advice from a financial adviser (or otherwise authorised by an AFS licensee) to provide financial product advice and dealing services in respect of the product.

Super Simplifier is not to be distributed under the following circumstances:

- Direct retail
- General advice
- Default-enrolled by employers.

Adequacy of distribution conditions and restrictions

The issuer has appointed a promoter to be responsible for the promotion of Super Simplifier which includes but is not limited to the provision of marketing materials, training of financial advisers and overall relationship management with AFS licensees and financial advisers of AFS licensees that are authorised to provide advice on Super Simplifier. It has been determined that the distribution conditions and restrictions will make it likely that customers who purchase the product are in the class of customers for which it has been designed after considering the target market and all disclosure documentation in place for the product.

5. Reviewing this target market determination

We will review this target market determination in accordance with the below:

Initial review	5 October 2021
Next periodic review	1 November 2022
Review triggers or events	<p>Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but is not limited to):</p> <ul style="list-style-type: none">• a material change to key product attributes, terms and/or conditions where the product issuer considers this reasonably suggests that this TMD is no longer appropriate, including a significant update to the Product Disclosure Statement and/or the issue of a Significant Event Notice;• occurrence of a significant dealing;• distribution conditions found to be inadequate;• identification of significant detriment to consumers if TMD was not reviewed;• external events such as adverse media coverage or regulatory attention;• significant changes in metrics, including, but not limited to, complaints;• significant increase in investment option switching;• significant increase in members exiting the product;• significant proportion of insurance cancellation rates;• significant proportion of insurance claims being denied or withdrawn;

- persistent member complaints about investment options or product;
- suspicious adverse results from market or different returns from those expected from the market;
- significant change in exposure in products, such as developments in international markets where the product may be overweight;
- sale or acquisition of an asset that was/is an important part of the investment holdings of a particular investment option;
- a change has occurred that effects the objectives of the target market

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

6. Reporting and monitoring this target market determination

We will collect the following information from our distributors in relation to this TMD.

Complaints	<p>Distributors will be required to report to issuers, complaints and other requested information that they receive, assisting issuers to assess whether their product governance arrangements are appropriate, and their products are meeting the needs of consumers.</p> <p>This will include the substance of complaints and general feedback relating to the product and its performance.</p> <p>Distributors will report as soon as practicable but, in any case, within 10 business days after the end of each quarter, ending on 31 March, 30 June, 30 September, and 31 December.</p>
Significant dealings	<p>Distributors will report if they become aware of a significant dealing in relation to this TMD within 10 business days.</p> <p>A significant dealing includes:</p> <ul style="list-style-type: none"> • Specific proportion of consumers who have acquired the product but are not in the target market, including the proportion of consumers who are part of a class of consumers that have been specifically excluded from the target market; • Potential/actual harm to consumers if consumers outside the target market acquire the product; • Inconsistency of distribution conditions with the TMD; • Proportion of superannuation contributions from the product from consumers outside the target market; • Time period when consumers outside the target market acquired the product

TMD Definitions

Reporting and monitoring this target market determination	
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 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 reporting period, • the consumer’s intended product use is <i>Solution / Standalone</i>, or • the consumer’s intended product use is <i>Core component</i> and the consumer’s risk (ability to bear loss) and return profile is <i>Low</i>.