

Signature Managed Account

Target Market Determination

1 November 2024

Issued by Colonial First State Investments Limited (CFSIL, Issuer, we, us, or our)

This Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). This TMD describes the class of consumers that comprises the target market for the financial product and matters relevant to the product's distribution and review (specifically, distribution conditions, review triggers and periods, and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the product being consistent with the most recent TMD (unless the distribution is excluded conduct).

This document is not a product disclosure statement (PDS) and is **not** a complete 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 PDS and other disclosure documents for the product and consider obtaining financial advice before making a decision whether to acquire 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 by accessing cfs.com.au/managed-accounts.

Target market summary

Signature Managed Account is offered out of a non-unitised registered managed investment scheme. This product is only available for investment through one of the following financial products:

- CFS Edge Investments, issued and operated by CFSIL
- CFS Edge Super, issued by Avanteos Investments Limited ABN 20 096 259 979, AFSL 245531 (**AIL**) as trustee for the Avanteos Superannuation Trust ABN 38 876 896 681
- CFS Edge Pension, issued by AIL as trustee for the Avanteos Superannuation Trust

(the **Investment or Super and Pension Service**).

This product is intended for use by a consumer who:

- is seeking to have investment access to a range of managed account portfolios, which are each designed, monitored and advised on by a portfolio manager that has been selected by the Issuer
- either:
 - has engaged, and continues to engage, a financial adviser that has been approved to distribute this product, to implement an investment strategy which selects one or more managed account portfolios offered through the product that suits the consumer's individual objectives, financial situation and needs; or
 - is an existing investor in the Investment or Super and Pension Service who does not have a financial adviser that has been approved to distribute this product (**Direct Investor**), is approved to be eligible to invest in this product despite not having an approved financial adviser, and is seeking a diversified portfolio of investments selected from a more limited menu of managed account portfolios (as compared to the menu of managed account portfolios available to a consumer with an approved financial adviser); or
- is an internal staff member of the Colonial First State group that has met certain predetermined criteria, such as satisfying a minimum individual gross income requirement, which reasonably evidence that:
 - the staff member has previous experience in using financial services and investing in financial products that allows the staff member to assess the merits and value of

the product and the risks associated with holding the product; and

- the product is likely to be consistent with the staff member's likely objectives, financial situation and needs;
- has an investment objective of Capital growth, Capital preservation and/or Income distribution that aligns with one or more of the managed account portfolios offered through the product;
- is intending to use the managed account portfolios offered through the product as:
 - in the case of a consumer **other than** a Direct Investor, a Solution/standalone, Major allocation, Core component, Minor allocation or Satellite allocation allocation of their total Investable Assets; or
 - in the case of a consumer who is a Direct Investor, a solution/standalone, major allocation or core component of their total Investable Assets;
- is seeking to invest their capital:
 - in the case of a consumer **other than** a Direct Investor, for a minimum timeframe of 2 to 10 years; or
 - in the case of a consumer who is a Direct Investor, for a minimum timeframe of 3 to 7 years;
- has a Low, Medium, High or Very high risk and return profile that aligns with one or more of the managed account portfolios offered through the product;
- is unlikely to need to withdraw their money on less than one week's notice;
- wishes to have the ability to customise the underlying investments in their portfolio held within the product;
- wishes to have visibility and transparency of their underlying holdings in the product and their trading activity within the product; and
- wishes to have the flexibility to personalise the management of the tax outcomes of their investments within the product.

Managed Account and Issuer identifiers

Issuer	Colonial First State Investments Limited
Issuer ABN	98 002 348 352
Issuer AFSL	232468

Managed account name	Signature Managed Account
Managed investment scheme name	Colonial First State Separately Managed Account
ARSN	618 390 051
TMD issue date	1 November 2024
TMD Version	1
Distribution status of managed account	Available

Description of Target Market

TMD indicator key

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

In target market	See issuer instructions	Not in target market
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Instructions

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.

Investment products and diversification

A consumer (or class of consumer) may intend to hold a managed account as part of a diversified portfolio (for example, with an intended product use of minor allocation). In such circumstances, the managed account 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 balanced or moderate diversified portfolio with a minor allocation to growth assets. In this case, a managed account with a High risk/return profile may be consistent with the consumer's objectives for that minor allocation notwithstanding that the risk/return profile of the consumer as a whole is Medium. In making this assessment, distributors should consider all features of a managed account (including its key attributes).

The FSC has provided more detailed guidance on how to take this portfolio view for diversification, available on the [FSC website](#).

Consumer attributes	TMD indicator	Product description including key attributes
Consumer's investment objective		
Capital growth	In target market	The product provides access to a range of managed account portfolios. The Issuer has appointed portfolio managers to provide portfolio management services in respect of the managed account portfolios, which may include managing the investment allocation and target weights of the portfolios and determining the investment strategy and underlying investments of the portfolios. The managed account portfolios available through the product include portfolios that have been designed to be likely to suit a consumer who has one or more of the following investment objectives: <ul style="list-style-type: none">• Capital Growth• Capital Preservation• Income Distribution.
Capital preservation	In target market	
Income distribution	In target market	
Consumer's intended product use (as a percentage of Investable Assets)		
Solution/standalone (up to 100%)	In target market	Through the product, a consumer can choose to invest a portion of their total Investable Assets into one or more managed account portfolios.
Major allocation (up to 75%)	In target market	
Core component (up to 50%)	In target market	In target market
Minor allocation (up to 25%)	See issuer instructions	The product makes available a broad range of managed account portfolios that are likely to be suitable as either: <ul style="list-style-type: none">• in the case of a consumer other than a Direct Investor, a Solution/Standalone, Major allocation, Core component, Minor allocation or Satellite allocation of a consumer's Investable Assets; or• in the case of a consumer who is a Direct Investor, a Solution/Standalone, Major allocation or Core component of a consumer's Investable Assets. Not in target market The product makes available a broad range of managed account portfolios that are not likely to be suitable as: <ul style="list-style-type: none">• in the case of a consumer who is a Direct Investor, a Minor allocation or Satellite allocation of a consumer's Investable Assets.
Satellite allocation (up to 10%)	See issuer instructions	
Consumer's investment timeframe		
Minimum investment timeframe	Consumers other than Direct Investors: 2–10 years Direct Investors: 3–7 years	The product makes available a broad range of managed account portfolios with different minimum suggested investment timeframes. Generally, the minimum suggested investment timeframe of the managed account portfolios accessible via the product: <ul style="list-style-type: none">• for consumers other than Direct Investors, range from 2 to 10 years; or• for Direct Investors, range from 3 to 7 years. Consumers should refer to the PDS for the product to determine if the minimum investment timeframe for a managed account portfolio aligns with them.
Consumer's risk (ability to bear loss) and return profile		
Low	In target market	The product makes available a broad range of managed account portfolios which have been designed with different risk and return profiles.
Medium	In target market	
High	In target market	

Consumer attributes	TMD indicator	Product description including key attributes
Very high	In target market	The risk profile of a managed account portfolio is calculated using the Standard Risk Measure (SRM) to estimate the likely number of negative annual returns over a 20-year period. Generally, the risk profile of the managed account portfolios available via the product range from Low to Very High. Please refer to the 'Definitions' section below for further information regarding the SRM. Consumers should refer to the PDS for the product to determine if the risk profile for the relevant managed account portfolio(s) aligns with their risk tolerance.
Extremely high	Not in target market	
Consumer's need to access capital		
Within one week of request	In target market	The product makes available a broad range of managed account portfolios with different liquidity timeframes.
Within one month of request	In target market	
Within three months of request	In target market	Withdrawals are normally processed within two working days of receiving a withdrawal request; however, longer processing periods may apply from time to time. In extraordinary circumstances (which may include where the underlying investment(s) in a portfolio becomes or is illiquid), there may be a suspension of withdrawals or restriction(s) on the ability to withdraw.
Within one year of request	In target market	
Within five years of request	In target market	Unless an underlying investment is suspended, restricted or unavailable, consumers typically may make a withdrawal from a managed account portfolio and from the product in accordance with normal processes.
Within 10 years of request	In target market	
Ten years or more	In target market	
At issuer discretion	Not in target market	
Consumer's other objectives/needs		
Timely adjustment of portfolio	In target market	The asset allocations and target weights of each managed account portfolio available through the product are monitored by the portfolio managers and the Issuer on an ongoing basis. A managed account portfolio may be rebalanced by the Issuer on instruction from the portfolio manager, to achieve the desired weightings in line with the objective and strategy of the relevant managed account portfolio, to take advantage of opportunities arising from market movements or in other circumstances the portfolio manager believes appropriate. Consumers should refer to the PDS for further information regarding rebalancing.
Management of tax position	In target market	All income, dividends, distributions, capital gains and capital losses and their tax consequences accrue directly to the consumer. Through the Investment or Super and Pension Service, consumers may be provided a more personalised tax outcome when compared to other investments. Investment Service consumers beneficially own, and Super and Pension Service consumers have a beneficial interest in, underlying investments providing direct access to any dividends and franking credits from listed Australian or international shares. The consumer, together with their adviser, may specify their parcel selection method for the purposes of calculating capital gains tax on underlying investments via the Investment or Super and Pension Service.
Visibility of investments in portfolio	In target market	Through the online investor portal maintained for the Investment or Super and Pension Service, consumers have visibility and transparency of underlying holdings in the product and trading activity.
Customisation of portfolio	In target market	When a consumer chooses to invest in a managed account portfolio, the underlying investments are chosen by the portfolio manager on their behalf. However, through the Investment or Super

Consumer attributes	TMD indicator	Product description including key attributes
		and Pension Service, consumers have the ability to customise a managed account portfolio by applying client-specific investment or income preferences. Consumers should refer to the PDS for further information regarding the application of client preferences.
Transfer of existing investment to portfolio	In target market	Through the Investment or Super and Pension Service, consumers have the ability to transfer certain existing assets into or out of a managed account portfolio that is available in the product. Underlying investments which are not available for in-specie transfer out may be converted into cash upon transfer out of the managed account portfolio.

Distribution conditions/restrictions

Distribution conditions	Distribution condition rationale	Distributors this condition applies to
<p>Only for distribution through dealing:</p> <ul style="list-style-type: none"> through the Investment or Super and Pension Service; and if distributor is reasonably satisfied that distribution is necessary to implement personal advice given to the consumer. 	<p>The product is suitable for distribution to retail consumers who are invested in the Investment or Super and Pension Service and who have received personal financial product advice from, and continue to be a client of, financial advisers who (i) are registered with the applicable issuer of the Investment or Super and Pension Service through a dealer group that has agreed to the issuer's terms, and (ii) meet the issuer's minimum criteria, which includes an array of internal and external checks, including the professional standards as outlined by the Australian Securities and Investments Commission, because:</p> <ul style="list-style-type: none"> the features and attributes of the product are relatively complex in nature; and minimum criteria has therefore been put in place for determining when to approve a relevant distributor to distribute the product; and financial advisers and/or a dealer group will therefore only be approved to distribute the product if they satisfy the applicable criteria and are considered suitable to distribute the product. 	Financial advisers who are registered with, and approved by, the applicable issuer of the Investment or Super and Pension Service.
Only for distribution through dealing by the applicable issuer of the Investment or Super and Pension Service to an approved Direct Consumer who is invested in the Investment or Super and Pension Service.	The product is suitable for distribution to retail consumers who are Direct Investors invested in the Investment or Super and Pension Service and who are approved to be eligible to invest in the product, because specific processes have been put in place to limit the investment menu available for Direct Investors to offer a range of managed account portfolios which may be appropriate for use for these consumers.	The applicable issuer of the Investment or Super and Pension Service.
Only for distribution through dealing by the applicable issuer of the Investment or Super and Pension Service to an internal staff member of the Colonial First State group who is invested in the Investment or Super and Pension Service.	<p>The product is suitable for distribution to retail consumers who are invested in the Investment or Super and Pension Service and who are an internal staff member of the Colonial First State group, because procedures have been put in place to ensure that each staff member who wishes to acquire an interest in the product must meet certain predetermined criteria, such as satisfying a minimum individual gross income requirement, which evidence to the reasonable satisfaction of the applicable issuer of the Investment or Super and Pension Service that:</p> <ul style="list-style-type: none"> the staff member has previous experience in using financial services and investing in financial products that allows the 	The applicable issuer of the Investment or Super and Pension Service.

Distribution conditions	Distribution condition rationale	Distributors this condition applies to
	<ul style="list-style-type: none"> staff member to assess the merits and value of the product and the risks associated with holding the product; and the product is likely to be consistent with the staff member's likely objectives, financial situation and needs. 	

Review triggers

- The use of product intervention powers, regulator orders or directions that affects the product
- Material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the product or distribution of the product
- Determination by the Issuer of an ASIC reportable significant dealing
- Material deviation from benchmark/objective over sustained period
- Material change to key product features or attributes, managed account portfolio investment objective, fees or terms and conditions
- Key attributes have not performed as disclosed by a material degree and for a material period
- Material change to the liquidity of the product such that the Issuer is no longer able to offer investment switching or withdrawals as per the PDS for the product
- Significant increase in product outflows
- Change to legislation which materially impacts upon the design or distribution of the product.

Mandatory TMD review dates

Review date	Maximum date for review
Initial review	1 November 2025
Subsequent review	1 November 2026

Distributor reporting requirements

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Act) relating to the product. The distributor should provide all the content of the complaint, having regard to privacy.	As soon as practicable but no later than 10 business days following end of calendar quarter.	All distributors
Significant dealing outside of target market, under section 994F(6) of the Act. See Definitions for further detail.	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	All distributors

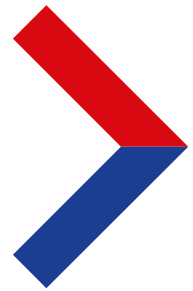
If practicable, distributors should adopt the FSC data standards for reports to the Issuer. Distributors must report to the Issuer using the method specified below:

- for complaints relating to the product – by email to membercare@cfs.com.au
- for significant dealings outside of the target market – by email to cfsppdo@cfs.com.au.

Disclaimer

The product and this TMD are issued by Colonial First State Investments Limited (ABN 98 002 348 352, AFSL 232468) as responsible entity of the Colonial First State Separately Managed Account (ARSN 618 390 051). CFSIL disclaims to the maximum extent permitted by law any liability associated with use, adoption and/or reliance of this document (including information inserted for illustrative purposes only).

Target Market Determination Definitions



This document should be read in conjunction with the Target Market Determination (TMD), available at cfs.com.au/tmd. For the avoidance of doubt, this document forms a part of the TMD.

Term	Definition
Consumer's investment objective	
Capital growth	The consumer seeks to invest in a product designed or expected to generate capital return over the investment timeframe. 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 designed or expected to have low volatility and minimise capital loss. The consumer prefers exposure to defensive assets that are generally lower in risk and less volatile than growth investments (this may include cash or fixed income securities).
Income distribution	The consumer seeks to invest in a product designed or expected to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (this may include high-dividend yielding equities, fixed income securities and money market instruments).
Consumer's intended product use (as a percentage of investable assets)	
Solution/standalone (up to 100%)	The consumer may hold the investment as up to 100% of their total <i>investable assets</i> . The consumer is likely to seek a product with <i>very high</i> portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>high</i> portfolio diversification.
Core component (up to 50%)	The consumer may hold the investment as up to 50% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>medium</i> portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>low</i> portfolio diversification.
Satellite allocation (up to 10%)	The consumer may hold the investment as up to 10% of the total <i>investable assets</i> . The consumer may seek a product with <i>very low</i> portfolio diversification. Products classified as <i>extremely high</i> risk are likely to meet this category only.
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)	
Note: exposures to cash and cash-like instruments may sit outside the diversification framework below.	
Very Low	The product provides exposure to a single asset (e.g. a commercial property) or a niche asset class (e.g. minor commodities, crypto-assets or collectibles).
Low	The product provides exposure to a small number of holdings (e.g. fewer than 25 securities) or a narrow asset class, sector or geographic market (e.g. a single major commodity (e.g. gold) or equities from a single emerging market economy).
Medium	The product provides exposure to a moderate number of holdings (e.g. up to 50 securities) in at least one broad asset class, sector and/or geographic market (e.g. Australian fixed income securities, Australian equities or Global equities).

Term	Definition
High	The product provides exposure to a large number of holdings (e.g. over 50 securities) in at least two broad asset classes.
Very high	The product provides exposure to a large number of holdings across a broad range of asset classes, sectors and geographic markets with limited correlation to each other.
Consumer's investment timeframe	
Minimum	The minimum suggested timeframe for holding the product. Typically, this is the rolling period over which the investment objective of the product is likely to be achieved.
Consumer's risk (ability to bear loss) and return profile	
<p>This TMD uses the Standard Risk Measure (SRM) to estimate the likely number of negative annual returns for this product over a 20 year period, using the guidance and methodology outlined in the Standard Risk Measure Guidance Paper For Trustees (note the bands in the SRM guidance differ from the bands used in this TMD). However, 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 (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some products may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating. A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>	
Low	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a conservative or low risk appetite, • seeks to minimise volatility and 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>The consumer typically prefers stable, defensive assets (such as cash).</p>
Medium	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a moderate or medium risk appetite, • seeks low volatility and potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)), and • is comfortable with a moderate target return profile. <p>The consumer typically prefers defensive assets (e.g. fixed income).</p>
High	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a high risk appetite, • can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)), and • seeks high returns (typically over a medium or long timeframe). <p>The consumer typically prefers growth assets (e.g. shares and property).</p>
Very high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a very high risk appetite, • can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)), and • seeks to maximise returns (typically over a medium or long timeframe). <p>The consumer typically prefers high growth assets (e.g. high conviction portfolios, hedge funds and alternative investments).</p>
Extremely high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> • has an extremely high risk appetite, • can accept significant volatility and losses, and • seeks to obtain accelerated returns (potentially in a short timeframe). <p>The consumer seeks extremely high risk, speculative or complex products which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes (e.g. crypto-assets or collectibles).</p>

Term	Definition
Consumer's need to access capital	
<p>This consumer attribute addresses the likely period of time between the making of a request for redemption/withdrawal (or access to investment proceeds more generally) and the receipt of proceeds from this request under ordinary circumstances. Issuers should consider both the frequency for accepting the request and the length of time to accept, process and distribute the proceeds of such a request. To the extent that the liquidity of the underlying investments or possible liquidity constraints (e.g. ability to stagger or delay redemptions) could impact this, this is to be taken into consideration in aligning the product to the consumer's need to access capital. Where a product is held on investment platforms, distributors also need to factor in the length of time platforms take to process requests for redemption for underlying investments. Where access to investment proceeds from the product is likely to occur through a secondary market, the liquidity of the market for the product should be considered.</p>	
Consumer's other objectives	
Timely adjustment of portfolio	The consumer seeks a product that enables a directly held portfolio to be monitored and adjusted in a timely and efficient manner by an investment adviser.
Management of tax position	The consumer seeks a product that enables the tax position of the consumer to be optimised or actively managed. This could for example include the selective realisation of gains and losses in a portfolio to reduce capital gains tax (CGT) liabilities, and the quarantining of the consumer's tax position from the tax position of other investors in the same product.
Visibility of investments in portfolio	The consumer seeks a product that provides the consumer with visibility of the investments in the portfolio.
Customisation of portfolio	The consumer seeks a product that provides the flexibility to add or remove investments from the portfolio. The customer or adviser may include or exclude investments (or categories of investment) for example to implement Environmental, Social and Governance (ESG) filtering, for tax reasons, for changing the regularity of income, or to accommodate existing investments.
Transfer of existing investment into portfolio	The consumer seeks a product that permits existing investments to be in specie transferred into the product, with the retention of direct ownership. These prior investments would then be managed inside the product in accord with the management of the whole managed account. The consumer may seek this option to reduce tax, brokerage and other transaction costs.
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.</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 and/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 quarter, • the consumer's intended product use is solution/standalone, • the consumer's intended product use is core component or higher and the consumer's risk/return profile is low, or • the relevant product has a green rating for consumers seeking extremely high risk/return.