



Target Market Determination (TMD)

Pearler Super

Issued by Equity Trustees Superannuation Limited (ETSL)
ABN 50 055 641 757 AFSL 229757

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 Equity Trustees Superannuation Limited (ABN 50 055 641 757) (**Trustee**) design and distribution arrangements for the product.

This document is not a product disclosure statement and is not to be treated as a full summary of terms and conditions applicable to Pearler Super. This document does not consider any person's individual objectives, financial situation or needs.

Consumers should carefully read the Product Disclosure Statement (**PDS**) for Pearler Super ('**product**') before deciding whether to acquire this product. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained from Pearler Investments Pty Ltd t/a Pearler ACN 625 120 649 (**Pearler**) or via pearler.com/super.

Product Disclosure Statement to which this target market determination applies

This TMD applies to the Pearler Super product. You should consider the following documents:

- o Pearler Super PDS (Part I and Part II); and
- o Pearler Investment Menu.

Fund and Issuer Identifiers

Name of Product	Pearler Super	Fund ABN	36 526 795 205
Issuer Name	Equity Trustees Superannuation Limited	USI Code	36 526 795 205 001
Issuer RSE Licence	RSE L0001458	Issuer AFSL	AFSL 229757

2. Important dates

Date from which this target market determination is effective	10 January 2025
Date when this target market determination will be next reviewed	Three years from the Effective Date, or subject to a review trigger or event

3. Product attributes

This product is designed for managing and investing a consumer's savings until their retirement. The product is designed to allow consumers to select from a range of investment options that suits them and is tailored to their individual financial objectives.

The key attributes of the Pearler Super product are:

- an accumulation account designed to invest consumers savings until they reach retirement or another condition of release.
- access to investment options/choices to enable a consumer to hold investments according to their risk profile, objectives, needs and circumstances through via the Pearler web platform or Pearler App.

4. The target market

This product is designed for consumers who are seeking a tax effective investment vehicle to save for their retirement.

Pearler Super **is** designed for consumers in Australia who:

- are eligible to contribute to a superannuation fund of their choice; and
- wish to engage with Pearler Super through the Pearler web platform or Pearler App; and
- understand that there are preservation rules which stipulates that amounts saved into superannuation cannot be withdrawn until retirement except in certain permitted scenarios; and
- can maintain minimum holding requirements for the investments which they may wish to acquire in superannuation;
- may wish to access the Pearler HomeSoon feature of Pearler Super to make additional voluntary contributions which can be used to purchase their first home; and

- are seeking consolidated, and detailed reporting for their investments and wish to access a range of approved investment options (as listed on the Pearler Investment Menu from time to time), including:
 - ASX listed Exchange Traded Funds (ETFs);
 - Listed investment companies (LICs); and
 - ASX listed Australian shares.

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

- are not eligible to choose the superannuation fund to which their superannuation contributions can be made
- are looking to obtain insurance cover through their superannuation product
- do not wish to manage their account through the Pearler web platform or Pearler App
- want a self-managed superannuation fund (SMSF)
- are born on or before 31 December 1969

Eligibility criteria

The key eligibility requirements of Pearler Super are:


- the consumer wishes to engage with Pearler Super through the Pearler web platform or Pearler App; and
- the consumer is born after 31 December 1969.

Objectives, financial situation, and needs

Consumers will be able to select investments from an approved product list (the Pearler Investment Menu). The investment options available on the Pearler Investment Menu have differing characteristics which will affect whether the investment option is generally suitable for different classes of consumers.. Consumers will be able to access general advice digitally via the Pearler web platform or Pearler App and determine which investment options may be most relevant to them, having regard to their own personal objectives, financial situation or needs.

The table below sets out the types of investments available to consumers in the broader market and their suitability for the class of consumers which Pearler Super 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	
ASX listed securities including Exchange Traded Funds, Listed Investment Companies and other similar listed fund products	
ASX listed hybrid securities and bonds	
Registered managed investment schemes	
Managed portfolios comprising the above types of products and within Approved Product List Holding Limits	
Separately managed accounts	
Other investment options including instalment warrants, investment restricted to wholesale investors and capital guaranteed options	
Longevity product options	
Capital guarantee options	

Consistency between target market and the product

This TMD 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.

5. How this product is to be distributed

Distribution channels

This product is designed to be distributed digitally by Pearler through the Pearler web platform or Pearler App. All prospective consumers must receive the PDS in Australia.

Distribution conditions

This product should only be distributed under the following circumstances:

- o a consumer must apply through the Pearler web platform or Pearler App.

Pearler Super is **not** to be distributed under the following circumstances:

- o to a direct retail consumer not applying through the Pearler web platform or Pearler App
- o default-enrolled by employers.

Adequacy of distribution conditions and restrictions

The issuer has appointed a promoter to be responsible for the promotion of Pearler Super which includes, but is not limited to, the provision of marketing materials and providing first line support to members. It has been determined that the distribution conditions and restrictions will make it likely that consumers who purchase the product are in the class of consumers for which it has been designed after considering the target market and all disclosure documentation in place for the product.

6. Reviewing this target market determination

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

Effective date	10 January 2025
Next periodic review	Three years from the Effective Date, or subject to a review trigger or event described below.
Review triggers or events	<p>Any one or more of the following situations will trigger a review of this TMD. This may include (but is not limited to):</p> <ul style="list-style-type: none"> • a material change to key product attributes, including any material 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 reportable significant dealing in the product • distribution conditions found to be inadequate • identification of significant detriment to consumers if TMD was not reviewed • external events such as adverse media coverage, regulatory attention, or regulatory changes that affect the product • the use of a Regulator’s Product Intervention Powers in relation to the product • significant changes in metrics, including, but not limited to, an unexpectedly high number of complaints about the design of the product or distribution of the product • significant increase in investment option switching • significant increase in members exiting the product • 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
- The commencement of a significant change in:
 - law or regulation; or
 - our legal interpretation of the law or regulation, that would reasonably suggest that the TMD is no longer appropriate.

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

7. Reporting and monitoring this target market determination

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

<p>Complaints</p>	<p>Pearler will be required to report to the Trustee complaints and other requested information that they receive, assisting the Trustee to assess whether its product governance arrangements are appropriate, and whether the product is 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>Pearler will report as soon as practicable but, in any case, within 10 business days after the end of 31 March and 30 September.</p>
<p>Significant dealings</p>	<p>Pearler will report if it becomes 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"> • A material 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 • A material proportion of superannuation contributions from the product from consumers outside the target market; or • Consumers outside the target market acquired the product within the reporting period.

TMD Definitions

Reporting and monitoring this target market determination

<p>Significant dealings</p>	<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 *Solution / Standalone*, or
 - the consumer's intended product use is *Core component* and the consumer's risk (ability to bear loss) and return profile is *Low*.
-

DISCLAIMER

The information contained in this target market determination is general information only and is not intended to be construed as either personal advice or a Product recommendation. You should make your own enquiries as to the suitability of this Product for your personal financial needs and circumstances and obtain and read a copy of the relevant PDS for further information on its suitability before making an investment.

This document contains general advice only. We have not taken into consideration any of your objectives, financial situation or needs or any information we hold about you when providing this general advice. Further this document does not contain, and should not be read as containing, any recommendations to you in relation to your product.

A copy of the Pearler Super PDS is available at pearler.com/super, you can have a copy sent to you at no cost by emailing help@pearler.com or calling (02) 5747 4747.

More Information

For further information, please contact Pearler directly.