

Target Market Determination



CC Sage Capital Absolute Return Fund Class A & Class C

Issuer	Channel Investment Management Limited (CIML)				
AFSL	439007	ABN	22 163 234 240		
APIR Code	Class A CHN5843AU	Class C CHN5604AU			
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Manager	Sage Capital Pty Ltd (Sage)				
Authorised Representative	001276472	ABN	81 632 839 877		
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Target Market Summary

The Fund may be suitable for investors with a medium to long investment horizon (5+ years), who are seeking capital growth via exposure to a range of long and short positions in Australian shares. There is a target of no exposure to the Australian equity market and investors should be willing to accept shorter term fluctuations in market value dependent on the manager’s stock selection skills. These investors may have a medium to very high risk/return profile and may be seeking exposure to a market neutral or absolute return portfolio of Australian equities to be used as a satellite allocation or core component of their portfolio.

Target Market Determination Indicator Key

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

In target market	Potentially in target market	Not considered in target market
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Generally, a consumer is unlikely to be in the target market for the product if:

- One (1) of more of their Consumer Attributes correspond to a red rating; or
- Three (3) 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

Investment Objective		
Capital Growth	In target market	The Fund is a market neutral fund where short positions and long positions offset each other, giving investors exposure to the manager's stock selection skills while aim to eliminate exposure to the underlying equity market. The Fund seeks to distribute semi-annually where funds are available.
Capital Preservation	Potentially in target market	
Capital Guaranteed	Not considered in target market	
Income Distribution	Potentially in target market	
Product Use (% of Investable Assets)		
Solution / Standalone (75 – 100%)	Not considered in target market	The Fund invests in: <ul style="list-style-type: none"> • Australian equities (long) 0 – 200% • Australian equities (short) 0 – 200% • Australian equities (net) -15 – 15%
Core Component (25 – 75%)	In target market	
Satellite / Small allocation (< 25%)	In target market	
Investment Timeframe		
Short (≤ 2 years)	Not considered in target market	Minimum suggested investment timeframe of at least 5 years.
Medium (> 2 years)	In target market	
Long (> 8 years)	In target market	
Risk and Return Profile		
Low	Not considered in target market	High. This means there is a high risk of losing money in any year. Conversely, the Fund is likely to produce higher returns over the long term. The Fund aims to achieve positive returns in excess of the RBA Cash Rate, after fees and expenses, over the long term by taking both long positions and short positions in selected Australian shares.
Medium	Potentially in target market	
High	In target market	
Very High	In target market	
Redemption Frequency		
Daily	In target market	The product is daily priced and redemptions can be requested on business days.
Weekly	In target market	
Monthly	In target market	
Quarterly	In target market	
Annually or longer	In target market	

Distribution Conditions

Distribution Conditions		
Platform	Nil	Channel Investment Management Limited has discretion to accept lower amounts
Direct investment	Minimum investment: Class A - \$100,000 Class C - \$250,000	

Review Requirements

Review Triggers	
Material change to key attributes, fund investment objective and/or fees	
Material deviation from benchmark / objective over sustained period	
Key attributes have not performed as disclosed by a material degree and for a material period	
Determination by the issuer of an ASIC reportable Significant Dealing	
Material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the product or distribution of the product	
The use of Product Intervention Powers, regulator orders or directions that affects the product	
Review Periods	
Initial review	1 year and 3 months
Regular scheduled review	3 years and 3 months

Distributor Reporting

Regular Reporting	
Complaints relating to the product design, product availability and distribution (as defined in section 994A(1) of the Act)	Quarterly
Significant dealing outside of target market (s994F(6) of the Act) See Definitions for further detail	As soon as practicable (within 10 days)

Contact Details

For any queries in relation to this target market determination or associated products, please contact distribution@channelcapital.com.au or visit the Channel Capital website (www.channelcapital.com.au).

Disclaimer

This Target Market Determination (TMD) is required under section 994B of the Corporations Act 2001 (Cth) (the Act) and is prepared by Channel Investment Management Limited ACN 163 234 240 AFSL 439007 (CIML) as the responsible entity and issuer of units for the Fund. 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 CIML's 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 the Fund before making a decision whether to invest in this Fund.

Important terms used in this TMD are defined in the Definitions section of this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained by contacting the Distribution Team or on our website at <https://www.channelcapital.com.au/>.

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Definitions

Term	Definition
Consumer's Investment Objective	
Capital Growth	The consumer seeks to invest in a product designed to generate capital return. 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 to reduce volatility and minimise loss in a market down-turn. The consumer prefers exposure to defensive assets (such as cash or fixed income securities) that are generally lower in risk and less volatile than growth investments.
Capital Guaranteed	The consumer seeks a guarantee or protection against capital loss whilst still seeking the potential for capital growth (typically gained through a derivative arrangement). The consumer would likely understand the complexities, conditions and risks that are associated with such products.
Income Distribution	The consumer seeks to invest in a product designed to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (typically, high dividend-yielding equities, fixed income securities and money market instruments).
Consumer's Intended Product Use	
Solution /Standalone (75 – 100%)	The consumer intends to hold the investment as either a part or the majority (up to 100%) of their total investable assets (see definition below). The consumer typically prefers exposure to a product with at least High portfolio diversification (see definitions below).
Core component (25 – 75%)	The consumer intends to hold the investment as a major component, up to 75%, of their total investable assets (see definition below). The consumer typically prefers exposure to a product with at least Medium portfolio diversification (see definitions below).
Satellite (<25%)	The consumer intends to hold the investment as a smaller part of their total portfolio, as an indication it would be suitable for up to 25% of the total investable assets (see definition below). The consumer is likely to be comfortable with exposure to a product with Low portfolio diversification (see definitions below).
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)	
Low	Single asset class, single country, low or moderate holdings of securities - e.g. high conviction Aussie equities.
Medium	1-2 asset classes, single country, broad exposure within asset class, e.g. Aussie equities "All Ords".
High	Highly diversified across either asset classes, countries or investment managers, e.g. Australian multi-manager balanced fund or global multi-asset product (or global equities).
Intended Investment Timeframe	
Short (≤ 2 years)	The consumer has a short investment timeframe and may wish to redeem within two years.
Medium (> 2 years)	The consumer has a medium investment timeframe and is unlikely to redeem within two years.
Long (> 8 years)	The consumer has a long investment timeframe and is unlikely to redeem within eight years.
Consumer's Risk (Ability to Bear Loss) And Return Profile	
<p>Issuers should undertake a comprehensive risk assessment for each product. The FSC recommends adoption of the Standard Risk Measure (SRM) to calculate the likely number of negative annual returns over a 20-year period, using the guidance and methodology outlined in the Standard Risk Measure Guidance Paper For Trustees. 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 or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. Issuers may wish to supplement the SRM methodology by also considering other risk factors. For example, some products may use leverage, derivatives or short selling, may have liquidity or withdrawal limitations, 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.</p> <p>A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>	
Low	The consumer is conservative or low risk in nature, seeks to minimise 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. Consumer typically prefers defensive assets such as cash and fixed income.

Medium	The consumer is moderate or medium risk in nature, seeking to minimise potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)) and comfortable with a moderate target return profile. Consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.
High	The consumer is higher risk in nature and can accept higher potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 6)) in order to target a higher target return profile. Consumer typically prefers predominantly growth assets such as shares, property and alternative assets with only a smaller or moderate holding in defensive assets such as cash and fixed income.
Very High	The consumer has a more aggressive or very high risk appetite, seeks to maximise returns and can accept higher potential losses (e.g. has the ability to bear 6 or more negative returns over a 20 year period (SRM 7) and possibly other risk factors, such as leverage). Consumer typically prefers growth assets such as shares, property and alternative assets.
Access to Funds	
Issuers should consider in the first instance the redemption request frequency under ordinary circumstances. However, the redemption request frequency is not the only consideration when determining the ability to meet the investor's requirement to access capital. 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 completing this section.	
Daily / weekly / monthly / quarterly / annually or longer	The consumer seeks to invest in a product which permits redemption requests at this frequency under ordinary circumstances and the issuer is typically able to meet that request within a reasonable period.
Distributor Reporting	
Significant dealing	<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. 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.