

Target Market Determination Walker Capital Australia Alternative Fund – Alternative Trust ARSN 646 309 631

Legal disclaimer

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 (being an interest in the Walker Capital Australia Alternative Fund – Alternative Trust), 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 **Gleneagle Asset Management Limited (ABN 29 103 162 278, AFSL 226199) (GAML)** 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**) prepared for the Class of the Walker Capital Australia Alternative Fund known as "Alternative Trust" before making a decision about whether to invest in 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 online via www.walkercapital.com.au or by contacting Walker Capital on +61 2 8076 2210.

The Walker Capital Australia Alternative Fund has more than one Class. This TMD is only for the Class known as the Alternative Trust.

Target Market Summary

This product is **likely** to be appropriate for a consumer seeking capital growth and income distributions and can be used as a satellite/ small allocation investment within a portfolio where the consumer has a minimum investment timeframe of at least six months, a very high risk/return profile and will not need daily access to capital but assurances that their funds can be withdrawn on a monthly basis within 21 days of receipt of a redemption request.

Fund and Issuer identifiers

Issuer	Gleneagle Asset Management Limited	ISIN Code	AU60TIM67095
Issuer ABN	29 103 162 278	Market Identifier Code	N/A
Issuer AFSL	226199	Product Exchange Code	N/A
Fund	Walker Capital Australia Alternative Fund – Alternative Trust	Date TMD approved	1/08/2022
ARSN	646 309 631	TMD Version	V.2
APIR Code	TIM6709AU	TMD Status	Current

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 with appropriate colour coding:

In target Market	Potentially in target market	Not considered 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.

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

One 'Not considered in target market' rating does not always mean a consumer is outside of the target market. For example, 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 relatively conservative overall 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	TMD Indicator	Product description including key attributes
Consumer's investment objective		
Capital Growth	Green	The investment objective of the Fund is to achieve an average of 2% growth per month before taking into account the fees and expenses. If available, income distributions for the Fund will be made on the least day of each financial year. Income Distribution is not guaranteed and GAML, by notice, may change the distribution times.
Capital Preservation	Orange	
Capital Guaranteed	Red	
Income Distribution	Green	
Consumer's intended product use (% of Investable Assets)		
Solution / Standalone (75%-100%)	Red	The Fund is suitable as a Satellite investment for investors who: <ul style="list-style-type: none"> are seeking short to medium term growth achieved by investing in the Foreign Exchange market; have a short to medium term investment horizon of at least 6 months to 2 years, but may be suitable for investment for longer timeframes; are seeking to access to a professional investment manager; and want a fund that is audited annually. <u>Features:</u> <ul style="list-style-type: none"> There are two investment strategies used to trade the foreign exchange market in the Alternative Trust, being: <ul style="list-style-type: none"> Swing Trading Strategies designed to generate consistent returns over lower volatility; and Day Trading Strategies designed to perform in market volatility and difficult conditions.
Core Component (25%-75%)	Orange	
Satellite / Small allocation (<25%)	Green	
Consumer's investment timeframe		
Short (\leq 2 years)	Green	The Fund is suitable for investors with short to medium investment horizons of at least six months to two years long, but may also be suitable for an investor with a longer investment timeframe.
Medium (> 2 years)	Green	
Long (> 8 years)	Orange	
Consumer's Risk (ability to bear loss) and Return profile		
Low	Red	<u>Risk:</u> <ul style="list-style-type: none"> The Fund is suited to investors with a high to very high risk profile and risk tolerance. The performance of the fund is subject to a number of different risks including the risks associated with general investment, the market, timing, politics, liquidity, changes in demand for particular sectors, portfolio investment, derivatives, foreign-exchange based fluctuations, investment manager risk, counterparty risk and fund risk.
Medium	Red	
High	Orange	

Consumer Attributes	TMD Indicator	Product description including key attributes
Very High		<u>Return:</u> The Fund is suitable for investors who accept that returns can be volatile and can expect drawdowns in excess of 40% in any month and that returns may also be negative
Consumer's need to withdraw money		
Daily		The minimum withdrawal amount is \$10,000, subject to the discretion of Responsible Entity and subject to the minimum balance always being above \$50,000.
Weekly		An investor can withdraw all or part of their investment in the Fund by contacting Walker Capital to obtain a Redemption Form or by writing to Walker Capital.
Monthly		The Fund processes withdrawals generally on a monthly basis following the first monthly Valuation Date provided the withdrawal request is received before the Designated Time.
Quarterly		
Annually or Longer		Under the Fund's Constitution, Walker Capital must, within 21 days of receipt of a redemption request, redeem the number or value of units specified in the withdrawal request by payment from the assets at the withdrawal price.
		Note: GAML may suspend withdrawals in certain circumstances (such as if GAML considers suspension of withdrawals to be in the interests of the unitholders as a whole, or if sufficient interests in the underlying investments cannot be realised or it is not reasonable practicable to determine the redemption price).

Appropriateness

GAML 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 as described above, as the features of this product in Column 3 of the table above are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Distribution conditions/restrictions

Distribution Condition	Distribution Condition Rationale
The Fund can be distributed to a consumer directly through Walker Consulting (Australia) Pty Ltd (Walker Capital), the investment manager or indirectly through an IDPS Operator.	<p>This product is only suitable for distribution:</p> <ul style="list-style-type: none"> directly through Walker Capital, who will assess electronic application forms which are validly executed and supported by required documentation. Assessment of application by an experienced and professional investment manager will ensure that only investors who fall within the target market for the product acquire the product; indirectly through an IDPS Operator who has obtained GAML's authorisation to use the funds PDS. This authorisation process ensures that GAML has the ability to monitor and supervise the activities of any distributors of the Fund. <p>Each of the distribution channels for the Fund have expertise in the complex nature of the Fund and are subject to a legal requirement to provide financial services efficiently, honestly and fairly. This ensures that the product will only be issued to investors who fall within the target market.</p>

Review triggers

This part is required under section 994B(5)(d) of the Act.

Material change to key attributes, fund investment objective and/or fees.

Material negative 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 GAML 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.

Mandatory review periods

This part is required under Section 994B(5)(e) and (f) of the Act.

Review Period	Maximum period for review
Initial review	1 August 2023
Subsequent review	Every 12 months

Distributor reporting requirements

This part is required under section 994B(5)(g) and (h) of the Act.

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Act) relating to the product design, product availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	Within 10 business days following end of calendar quarter.	All distributors
Significant dealing outside of target market, under s994F(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
To the extent a distributor is aware, dealings outside the target market, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	Within 10 business days following end of calendar quarter.	All distributors

If practicable, distributors should adopt the FSC data standards for reports to GAML. Distributors must report to Walker Capital or GAML by emailing admin@walkercapital.com.au or funds@gleneagle.com.au. This email can also be used to provide contact details relating to this TMD for GAML.

Disclaimer

Issued by Gleneagle Asset Management Limited AFSL 226199 (**GAML**). GAML is the Responsible Entity and issuer of units in the managed investment scheme referred to in this material. This document does not take into account your investment objectives, financial situation or particular needs. If you are interested in acquiring this product you should carefully read and consider the PDS for the product, and consider obtaining professional investment advice tailored to your specific circumstances before making a decision whether to invest in this product.

A copy of the relevant PDS relating to this product may be obtained online via www.walkercapital.com.au or by contacting Walker Capital on +61 2 8076 2210.

No person guarantees the future performance of the Fund, the amount or timing of any return from it, that asset allocations will be met, that it will be able to implement its investment strategy or that its investment objectives will be achieved. GAML will not be responsible or liable for any losses arising from your use or reliance upon any part of the information contained in this TMD.

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 (% of Investable Assets)	
Solution/Standalone (75-100%)	The consumer intends to hold the investment as either a part or the majority (up to 100%) of their total <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least High <i>portfolio diversification</i> (see definitions below).
Core Component (25-75%)	The consumer intends to hold the investment as a major component, up to 75%, of their total <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least Medium <i>portfolio diversification</i> (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 <i>investable assets</i> (see definition below). The consumer is likely to be comfortable with exposure to a product with Low <i>portfolio diversification</i> (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).
Consumer's 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.

Term	Definition
Consumer's Risk (ability to bear loss) and Return profile	
Issuers should undertake a comprehensive risk assessment for each product.	
A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.	
Low	<p>The consumer is conservative or low risk in nature, seeks to minimise potential losses and is comfortable with a low target return profile.</p> <p>Consumer typically prefers defensive assets such as cash and fixed income.</p>
Medium	<p>The consumer is moderate or medium risk in nature, seeking to minimise potential losses and comfortable with a moderate target return profile.</p> <p>Consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.</p>
High	<p>The consumer is higher risk in nature and can accept higher potential losses in order to target a higher target return profile.</p> <p>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.</p>
Very high	<p>The consumer has a more aggressive or very high risk appetite, seeks to maximise returns and can accept higher potential losses.</p> <p>Consumer typically prefers growth assets such as shares, property and alternative assets.</p>
Consumer's need to withdraw money	
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 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).

Term	Definition
	<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>.