

Target Market Determination

Walker Capital Fixed Income Fund ARSN 653 791 916

This Target Market Determination (TMD) sets out the class of consumers for whom units in Walker Capital Fixed Income Fund (the **Product**), including its key attributes, would likely to be suitable for given their likely objectives, financial situation and needs.

This document is **not** a Product Disclosure Statement (PDS) and is **not** a summary of the features or terms of the Product. This document does not take into account any person's individual objectives, financial situation or needs. Customers interested in acquiring the Product should carefully read the PDS before making a decision whether to acquire the product. Terms used in this TMD are defined in the TMD Definitions and capitalised terms not defined in the TMD Definitions have the meaning given to them in the PDS. The PDS can be obtained from www.walkercapital.com.au.

Target Market Summary

The Product is most likely to be appropriate for a consumer:

- seeking Capital Preservation and Income Distribution to hedge inflation with the accompanying Financial Risk
- using it as a Core Component, Satellite Component or potentially as a Standalone Solution within a portfolio;
- who has a short to Long Term investment timeframe;
- and a Medium or potentially a High risk/return profile who does not need access to capital for at least 6 months and
- Consumers wanting an investment that is not correlated with share markets;

Fund and Issuer Identifiers

Issuer	Primary Securities Ltd
Issuer ACN	089 812 635
Issuer AFSL	224107
Fund	Walker Capital Fixed Income Fund
ARSN	651 645 715

Manager	Walker Consulting (Australia)
Manager ACN	650 455 486
TMD Approved	21 February 2023
TMD Version	4.0
TMD Status	Available

Target Market Assessment

The Consumer Attributes for which the Product is likely to be appropriate have been assessed using the following TMD indicator keys:

In target market

Potentially in target market

Not considered in target

Generally, a consumer is unlikely to be in the target market for the Product if:

- one or more of their Consumer Attributes correspond to the indicator: Not considered in target market
- three or more of their Consumer Attributes correspond to the indicator: Potentially in target market

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. As such, 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 the Product (including its key attributes).

Consumer	TMD Indicator	Product Key Attributes
Consumer's investment objective		
Capital Growth	Not considered in target market	The Product's objective is for investors to receive a consistent targeted distribution of income of 5% per annum stable monthly returns via exposure to indirect investments, by investing in other funds which invest, in investment grade corporate bonds, government bonds, asset backed securities, inflation derivatives, interest rate derivatives, bank bills and negotiable certificates of deposit issued by Australian banks and other derivatives specifically to achieve fixed income investments. In addition, loans up to a maximum of 50% of the Fund's assets at the time, made for the purposes of acquiring Financial Planning Businesses, and legal and accounting practices (Financial Businesses), and for trading or investments in financial products as defined by the Corporations Act offered by ASIC Licensed Providers (Financial Product Investing). The loans are secured by a general Security Agreement or other form of security.
Income	In target market	
Capital	In target market	
Capital Guaranteed	Not considered in target market	
Consumer's intended product use		
Solution/Standalone (75-100%)	Potentially in target market	The Product provide consumers with an opportunity to access stable monthly returns via

Consumer	TMD Indicator	Product Key Attributes
Core Component	In target market	exposure to fixed income assets and loans.
Satellite / small allocation (< 25%)	In target market	
Consumer's investment timeframe		
Short (≤ 2 years)	In target market	There is no minimum investment term, however, penalties will apply to withdrawals made within the first 6 months of investing.
Medium (>2 years)	In target market	
Long (> 8 years)	In target market	
Consumer's Risk (ability to bear loss) and Return Profile		
Low	Potentially in target market	The Product is in target market for consumers of Medium and potentially in target market for consumers of High risk/return profile when applying the Standard Risk Measure guide and exists in the defensive fixed income asset class. The Product is designed to preserve capital through investing in a capital stable Fixed income producing investment grade bonds with a weighted average credit rating of no lower than BBB- assets with a high level of diversification.
Medium	In target market	
High	Potentially in target market	
Very High	Not considered in target market	
Consumer's need to withdraw money		
Daily	Not considered in target market	You can request to withdraw all or part of your investment in the Fund on a monthly basis subject to cut off times, resulting in the redemption proceeds being paid to you, by providing a redemption request in the required form to Primary Securities Limited.
Weekly	Not considered in target market	
Monthly	Not considered in target market	
Quarterly	In target market	The there is no minimum investment term, however, penalties will apply to withdrawals made within the first 6 months of investing. The minimum withdrawal amount is \$10,000 and subject to the minimum balance always being above \$100,000.
Annually or longer	In target market	
Consumer's need to withdraw money		

Consumer	TMD Indicator	Product Key Attributes
Daily	Not considered in target market	<p>You can request to withdraw all or part of your investment in the Fund on a monthly basis subject to cut off times, resulting in the redemption proceeds being paid to you, by providing a redemption request in the required form to Primary Securities Limited.</p> <p>The there is no minimum investment term, however, penalties will apply to withdrawals made within the first 6 months of investing.</p> <p>The minimum withdrawal amount is \$10,000 and subject to the minimum balance always being above \$100,000.</p>
Weekly	Not considered in target market	
Monthly	Not considered in target market	
Quarterly	In target market	
Annually or longer	In target market	

Distributor Information

The following section is for Distributors only. Distributors include AFS licensees or authorised representatives that engage in retail distribution of the Product. Distribution means 'retail product distribution conduct' in relation to a consumer, comprising dealing in the financial product, providing a disclosure document in relation to offering a financial product, providing a PDS, or providing financial product advice.

Distribution Conditions / Restrictions:

The Product is only suitable for distribution through the specified distributors:

- Walker Consulting (Australia) Pty Ltd (Walker Capital) via the website,
- Walker Capital Private Wealth Pty Ltd (Walker Capital Private Wealth) and Financial Planning Companies being Corporate Authorised Representatives of Walker Capital Private Wealth investing directly into the Fund and indirectly via Walker Capital model portfolios on Mason Stevens Limited (Mason Stevens) investing an allocation into the Fund based on personal advice being given to the consumers.

Adequacy of distribution conditions:

- The Distributor must take reasonable steps where applicable to ensure that consumers are receiving products likely to be consistent with their objectives, financial situation and needs.
- If Distributors distribute the product, including being distributed through broad channels, the Distributors must ensure the product is targeted towards consumers that fall within the Target Market Assessment as outlined earlier in this document. This can be achieved by the Distributor selecting its distribution methods so that the likelihood of consumers outside the target market taking up the Product is low.

When determining 'reasonable steps', the Distributor must consider:

- The circumstances of the interaction, including how the interaction takes place (online, in person, over the phone) and any information or advice provided to the consumer about the

specific product.

- If there is no interaction or advice provided the Distributor must ensure that the information provided to the consumers must be clearly worded so that there is no misunderstanding by the consumer to ensure they fall within the Target Market Assessment as outlined earlier in this document.

Distributors must keep complete and accurate records including records of complaints received about the Product.

Mandatory Review Periods:

The Distributor and issuer must review this TMD:

- 12 months following the issuance of this TMD or earlier if there are any review triggers
- Subsequent reviews annually Distributor Reporting Requirements:

Review Triggers:

- Material change to investment strategy, objectives, key attributes or fees.
- Material difference between actual monthly distributions and the Offered Returns published for the Product 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 about the Product or distribution of the Product.
- The use of ASIC's product intervention powers, regulator orders or directions that affects the product.

If the Review Triggers are triggered and the Distributor has notified the issuer that the TMD is no longer appropriate for that product, the Distributor must stop distributing products as soon as practical but no later than 10 days after the distributor becomes aware that the product is no longer appropriate.

Reporting requirement	Reporting period	Applicable distributors
Complaints received by a distributor relating to the product design, product availability and distribution of the Product. The distributor should provide all the data, content and details of the complaint, having regard to privacy, where appropriate.	Within 10 business days following end of calendar quarter.	All distributors

Reporting requirement	Reporting period	Applicable distributors
Actual and potential significant dealing not consistent with the target market. Examples could be a single product where an inappropriate sale results in an adverse financial impact for the consumer.	As soon as practical but no later than 10 days after the distributor becomes aware of the significant dealing.	All distributors
To the extent a distributor is aware, dealings not consistent with the target market, including reason why the acquisition is outside of target market, and whether the acquisition occurred under personal advice.	Within 10 business days following end of calendar quarter.	All distributors

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,
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).

Consumer's intended product use	
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 / small allocation (25-75%)	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).
Portfolio diversification (for analysing the key product attribute section of consumer's intended	
Low	Single asset class, single country, low or moderate holdings of securities.
Medium	1-2 asset classes, single country, broad exposure within asset class.
High	Highly diversified across either asset classes, countries or investment funds.
Consumer's intended investment timeframe	
Short (<2 years)	The consumer has a short investment timeframe and may wish to redeem
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

Consumer's Risk	
<p>The Standard Risk Measure (SRM) is an industry guide which has been used to assist in the Consumer's Risk component of this TMD. It is based on guidance from the Australian Prudential and Regulation Authority (APRA) to allow consumers to compare investment options that are expected to deliver a similar number of negative annual returns over any 20- year period. The SRM is not a complete assessment of all forms of investment risk, consumers of the Product should ensure they are comfortable with the risks and potential losses associated with their chosen investment options including the impact of fees, costs and taxes.</p>	
Low	<p>The consumer is conservative or low risk in nature and 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.</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 (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.</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>

Consumer's Risk	
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.
Consumer's need to withdraw money	
Daily / Weekly / Monthly / Quarterly 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.