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# Opportunistic Development Fund



Target Market Determination

2 September 2024

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# Introduction

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 for the Remara Opportunistic Development Fund (**Fund**) before making a decision whether to buy 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 on request via the Fund Manager's website <https://remara.com/funds/real-estate-fund-australia/>

## Target Market Summary

**This product is intended for use as a satellite allocation of a broader portfolio for a consumer who is seeking capital growth and has a high risk return profile for that portion of their investment portfolio. It is likely to be consistent with the financial situation and needs of a consumer who has a minimum investment timeframe of 2-5 years, and will not need to withdraw their money on less than 6 months' intervals (and who can afford for withdrawals to be delayed in certain circumstances – please see section 4 of the PDS).**

## Fund and Issuer identifiers

Issuer	AMAL Fund Services Limited
Issuer ABN	658 186 488
Issuer AFSL	542056
Fund manager	Remara Investment Management Pty Ltd
Fund name	Remara Opportunistic Development Fund
ARSN	671 627 437
APIR Code	AMA9343AU
TMD issue date	2 September 2024
TMD Version	1.0
Distribution status of Fund	Available, refer to PDS



# 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 and green rating methodology:

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.

## Appropriateness

The Issuer 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 the features of this product in Column 3 of the table below are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

## Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (for example, with an intended product use of *minor allocation*). 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 balanced or moderate diversified portfolio with a minor allocation to growth assets. In this case, a product 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 product (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
<b>Consumer's investment objective</b>		
Capital Growth	In target market	The Fund is designed for investors looking for capital growth over the medium to long term. It aims to build a diversified portfolio of indirectly held residential and small-scale commercial property development assets that provide the potential for relatively high capital growth. The Fund aims to provide a total return over time of at least 15% p.a. (net of fees and expenses and before tax). While the Fund may pay income distributions, timing of distributions and distribution yields may vary significantly during the life of the Fund. The Fund has not been designed for investors with a need for regular income or who are seeking capital preservation. Refer to section 5.5 of the PDS.
Capital Preservation	Not considered in target market	
Income Distribution	Not considered in target market	
<b>Consumer's intended product use (% of Investable Assets)</b>		
Solution/Standalone (up to 100%)	Not considered in target market	The Fund will provide indirect exposure to Australian real estate developments in both residential and small-scale commercial properties. This involves investments in a range of assets such as duplex developments, townhouse developments, apartment developments, land sub-divisions and small-scale commercial developments.
Major Allocation (up to 75%)	Not considered in target market	
Core Component (up to 50%)	Not considered in target market	Though the Fund's portfolio is designed to be diversified across a number of developments in terms of size, development format and geography, the Fund's portfolio diversification is Low. This Fund may be suitable for investors seeking exposure to Australian real estate developments as part of a broader portfolio. Investors should use the Fund as a Satellite allocation to reduce investment risk through diversification, and to invest an appropriate portion of their available investment capital into the Fund.
Minor allocation (up to 25%)	Not considered in target market	
Satellite allocation (up to 10%)	In target market	
<b>Consumer's investment timeframe</b>		
Minimum investment timeframe	2-5 years	The minimum suggested time frame for holding investments in the Fund is between 2–5 years (medium to long term investment) and the Fund is therefore likely to be appropriate for a consumer who has a medium to long investment timeframe.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>		
Low	Not considered in target market	The Fund is expected to have a High risk/return profile. Refer to section 7 of the PDS for more information on applicable investment risks.
Medium	Not considered in target market	
High	In target market	
Very high	In target market	



Extremely high	In target market	
<b>Consumer's need to access capital</b>		
Within one week of request	Not considered in target market	The Fund assets are expected to generally have low liquidity. Subject to the limitations on redemptions set out in section 4.2 and 4.3 of the PDS, including an initial 12 month lock up, the Units in the Fund can generally be redeemed on a semi-annual basis.
Within one month of request	Not considered in target market	
Within three months of request	Not considered in target market	
Within six months of request	In target market	Until the Fund reaches the required scale, which, as at the date of the PDS, is expected to be AUD\$10,000,000 in net assets, there is a risk the Fund will not have sufficient liquidity to satisfy withdrawal requests within the intended semi-annual redemption windows.
Within one year of request	In target market	
Within 5 years of request	In target market	
Within 10 years of request	In target market	
Within 10 years or more	In target market	Please refer to the PDS for more information.

## Distribution conditions/restrictions

Distribution conditions	Distribution condition rationale	Distributors this condition applies to
<p><b>Direct Distribution:</b></p> <p>Distributors may only distribute to direct retail clients where the distributor is:</p> <ul style="list-style-type: none"> <li>providing personal advice in relation to the product; or</li> <li>reasonably satisfied that distribution is necessary to implement personal advice given to the consumer; or</li> <li>otherwise reasonably satisfied the consumer is within the target market.</li> </ul>	<p>The Issuer considers that the distribution condition will make it likely that consumers who acquire the product will be in the target market for the product, or the product will otherwise be appropriate for them.</p>	<p>All distributors excluding platform providers</p>
<p><b>Platform Distribution:</b></p> <p>Platform providers approved to distribute the product must have suitable controls in place that is likely to result in consumers accessing the product via the platform who are within the target market.</p>	<p>Investors may access the product indirectly via a platform. Platform providers must be able to reasonably assume the investor is within the target market prior to making the product available to them.</p>	<p>Approved platform providers</p>



# 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.

# Mandatory reporting requirements

Review period	Maximum period for review
Initial review	1 year from the date of issue
Subsequent review	At least annually following the initial review.

# 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



# Disclaimer

This TMD is issued by AMAL Fund Services Limited ACN 658 186 488 AFSL No. 542056 in its capacity as the responsible entity and issuer for the purpose of satisfying requirements under section 994B of the Corporations Act 2001 (Cth). This TMD includes general information only and does not take into account your individual objectives, financial situation, needs or circumstances. Before making any investment decision, you should assess whether the material is appropriate for you and read the product disclosure statement for the product. The PDS can be obtained on request via <https://remara.com/funds/real-estate-fund-australia/>

To the maximum extent permitted by law, no liability is accepted for any loss or damage as a result of any reliance on this information. This TMD does not constitute a financial product recommendation or an offer or solicitation with respect to the purchase or sale of the product in any jurisdiction. This material is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation

# Definitions

In some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Term	Definition
<b>Consumer’s investment objective</b>	
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).
<b>Consumer’s intended product use (% of Investable Assets)</b>	
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 investable assets. The consumer may seek a product with very low portfolio diversification. Products classified as extremely high risk are likely to meet this category only.
<i>Investable Assets</i>	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 (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).
Low	The product provides exposure to a small number of holdings (for example, fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, 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 (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).
High	The product provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asset classes, sectors or geographic markets (for example, global equities).
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 intended 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.
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**Consumer’s Risk (ability to bear loss) and Return profile**

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.





Low	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a conservative or low risk appetite,</li> <li>• 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 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</li> <li>• is comfortable with a low target return profile.</li> </ul> <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"> <li>• has a moderate or medium risk appetite,</li> <li>• 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</li> <li>• is comfortable with a moderate target return profile.</li> </ul> <p>The consumer typically prefers defensive assets (for example, fixed income).</p>
High	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a high risk appetite</li> <li>• 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</li> <li>• seeks high returns (typically over a medium or long timeframe).</li> </ul> <p>The consumer typically prefers growth assets (for example, 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"> <li>• has a very high risk appetite</li> <li>• 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</li> <li>• seeks to maximise returns (typically over a medium or long timeframe).</li> </ul> <p>The consumer typically prefers high growth assets (such as 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"> <li>• has an extremely high risk appetite,</li> <li>• can accept significant volatility and losses, and</li> <li>• seeks to obtain accelerated returns (potentially in a short timeframe).</li> </ul> <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 (for example, crypto-assets or collectibles).</p>

**Consumer's need to access capital**

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.



## Distributor Reporting

### Significant dealings

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.

Dealings outside this TMD may be significant because:

- 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).

In each case, the distributor should have regard to:

- 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 ratings attributed to the consumer).

Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if:

- 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.



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