

## TARGET MARKET DETERMINATION

<b>Issuer</b>	Yarra Funds Management Limited		
<b>Issuer ABN</b>	63 005 885 567	<b>Issuer AFSL</b>	230 251
<b>Fund</b>	<b>ARK Global Disruptive Innovation Fund</b>	<b>TMD Contact Details</b>	<a href="mailto:ddo@yarracm.com">ddo@yarracm.com</a>
<b>ARSN</b>	627 341 744	<b>APIR Code</b>	NIK1854AU
<b>TMD issue date</b>	9 December 2024	<b>TMD Version</b>	5.0
<b>Distribution status of fund</b>	Available		

### Target Market Summary

This product is intended for use as a **satellite allocation** for a consumer who is seeking **capital growth** and has an **extremely high** risk and return profile for that portion of their investment portfolio. It is likely to be consistent with the financial situation and needs of a consumer with a **7+ year** investment timeframe and who is unlikely to need to withdraw their money on less than **10 business days'** notice.

### 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 product 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 by contacting our Investor Services team on 1800 034 494 or from our website at [www.yarracm.com/pdsupdates](http://www.yarracm.com/pdsupdates).

## 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:



### 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	G	The Fund is designed for investors who seek a global equity portfolio that provides long-term capital growth via exposure to disruptive innovation, but who accept the risk of significant price fluctuations. Due to the capital growth style of this Fund it is expected annual income distributions will be minimal or nil at times.
Capital Preservation	R	
Income Distribution	R	
<b>Consumer's intended product use (% of Investable Assets)</b>		
Solution/Standalone (up to 100%)	R	The Fund provides access to a global equity portfolio that offers thematic exposure to disruptive innovation across a number of sectors, economies, geographies and companies. This includes access to early-stage and emerging companies through listed global equity markets, which offer high growth potential without the high costs and illiquidity typically associated with similar investments accessed via venture capital funds. The Fund has <i>medium</i> portfolio diversification.
Major allocation (up to 75%)	R	
Core component (up to 50%)	R	
Minor allocation (up to 25%)	R	
Satellite allocation (up to 10%)	G	
<b>Consumer's investment timeframe</b>		
Minimum investment timeframe	7+ years	The suggested minimum investment time frame is 7+ years.

Consumer Attributes	TMD indicator	Product description including key attributes
<b>Consumer's Risk (ability to bear loss) and Return profile</b>		
Low	R	The likelihood of the value of your investment going down over the short-term is extremely high compared to investments in funds investing in other types of assets such as fixed interest or cash.
Medium	R	
High	R	
Very high	R	
Extremely high	G	
<b>Consumer's need to access capital</b>		
Within 5 business days of request	R	Withdrawal requests received before or on 2pm Sydney time on a Business Day will generally be processed using the withdrawal price calculated as at the close of business on that day, if accepted. Withdrawal requests received after this time, or on a non-Business Day, will generally be processed using the withdrawal price applicable for the next Business Day, if accepted.
Within 10 business days of request	G	
Within one month of request	G	Withdrawal proceeds are usually paid within ten Business Days of receiving your withdrawal request, although the Fund's constitution allows up to 180 days to process withdrawal requests and 21 days to pay the proceeds thereafter.
Within one year of request	G	
One year or more of request	G	

## Distribution conditions/restrictions

Distribution conditions	Distribution condition rationale
The product can only be distributed through the Adviser channel.	This product pursues an active investment strategy and only consumers with an extremely high risk profile should consider to invest.
Distributors may only engage in retail product distribution conduct if: <ul style="list-style-type: none"><li>• they are providing personal advice in relation to the product, or</li><li>• they are reasonably satisfied that distribution is necessary to implement personal advice given to the consumer.</li></ul>	Yarra 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, because persons providing personal advice must consider the consumer's individual circumstances and comply with the best interests' duty and related obligations under Pt 7.7A of the Corporations Act 2001 (Cth).

## 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 TMD review periods

Review period	Maximum period for review
Initial review	1 year and 3 months
Subsequent review	3 years and 3 months

## 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

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to Yarra Funds Management Limited using [ddo@yarracm.com](mailto:ddo@yarracm.com).

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## 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> .
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total <i>investable assets</i> .
Core component (up to 50%)	The consumer may hold the investment as up to 50% of their total <i>investable assets</i> .
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total <i>investable assets</i> .
Satellite allocation (up to 10%)	The consumer may hold the investment as up to 10% of the total <i>investable assets</i> . Products classified as <i>extremely high</i> 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.



Term	Definition
<b>Portfolio diversification (for completing the key product attribute section of consumer's intended product use)</b> 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.
<b>Consumer's intended investment timeframe</b>	
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.

Term	Definition
<p><b>Consumer's Risk (ability to bear loss) and Return profile</b></p> <p>This TMD uses the Standard Risk Measure (<b>SRM</b>) 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 <i>Standard Risk Measure Guidance Paper For Trustees</i> (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.</p> <p>A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>	
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</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>

Term	Definition
Very high	<p data-bbox="645 248 1317 271">For the relevant part of the consumer’s portfolio, the consumer:</p> <ul data-bbox="707 296 2096 430" style="list-style-type: none"> <li data-bbox="707 296 1048 319">• has a very high risk appetite,</li> <li data-bbox="707 331 2096 392">• 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 data-bbox="707 405 1487 430">• seeks to maximise returns (typically over a medium or long timeframe).</li> </ul> <p data-bbox="645 450 1980 475">The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).</p>
Extremely high	<p data-bbox="645 488 1317 510">For the relevant part of the consumer’s portfolio, the consumer:</p> <ul data-bbox="707 529 1514 628" style="list-style-type: none"> <li data-bbox="707 529 1164 552">• has an extremely high risk appetite,</li> <li data-bbox="707 564 1272 587">• can accept significant volatility and losses, and</li> <li data-bbox="707 600 1514 628">• seeks to obtain accelerated returns (potentially in a short timeframe).</li> </ul> <p data-bbox="645 647 2056 705">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.

Term	Definition
<b>Distributor Reporting</b>	
Significant dealings	<p data-bbox="580 309 2110 368">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 data-bbox="580 389 2110 448">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 data-bbox="580 469 1144 489">Dealings outside this TMD may be significant because:</p> <ul data-bbox="629 510 2110 619" style="list-style-type: none"> <li data-bbox="629 510 2018 531">• they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or</li> <li data-bbox="629 552 2110 619">• 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).</li> </ul> <p data-bbox="580 639 1111 660">In each case, the distributor should have regard to:</p> <ul data-bbox="629 681 2110 866" style="list-style-type: none"> <li data-bbox="629 681 1928 702">• the nature and risk profile of the product (which may be indicated by the product’s risk rating or withdrawal timeframes),</li> <li data-bbox="629 722 2110 782">• 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</li> <li data-bbox="629 802 2110 866">• 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).</li> </ul> <p data-bbox="580 887 1682 908">Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if:</p> <ul data-bbox="629 928 2033 1093" style="list-style-type: none"> <li data-bbox="629 928 2033 949">• it constitutes more than half of the distributor’s total retail product distribution conduct in relation to the product over the quarter,</li> <li data-bbox="629 970 1301 991">• the consumer’s intended product use is <i>solution/standalone</i>,</li> <li data-bbox="629 1011 1854 1032">• the consumer’s intended product use is <i>core component</i> or higher and the consumer’s risk/return profile is <i>low</i>, or</li> <li data-bbox="629 1053 1599 1093">• the relevant product has a green rating for consumers seeking <i>extremely high</i> risk/return.</li> </ul>