



## **Target Market Determination**

**This Target Market Determination (TMD) is made by Central Victorian Investments Ltd in accordance with the design and distribution requirements relating to financial products for retail clients contained in Part 7.8A of the Corporations Act 2001.**

### **1. Target Market**

The class of consumers that comprises the target market for the CVI Notes issued by the Company (products) are consumers who want either:

- (a) a fixed interest, fixed term investment; or
- (b) a non-fixed term investment redeemable on 31 days notice,

in each case where the assets of the Company consist primarily of first mortgages over real property, and where a trustee approved under the Corporations Act 2001 has been granted security over the assets of the Company to hold for the benefit of the consumers.

The class of consumers for whom the products issued by the Company are likely to be appropriate, having regard to their likely objectives, financial situation and needs, are:

- Consumers who are prepared to commit their funds for a fixed term over a short or medium timeframe, with only a very limited opportunity to redeem their funds early in the case of hardship or the absolute discretion of the Company;
- Consumers who have a medium to high ability to bear the loss of the funds invested (risk profile). While the Trustee holds security on behalf of investors, there is no guarantee that the security will ultimately be sufficient to ensure all the monies invested with the Company are repaid.

The Company's products are not appropriate for consumers who seek, and such consumers do not form part of the target market:

- A guaranteed return of capital. While the Company is satisfied that the security held by the Trustee on behalf of consumers is reasonably likely to be sufficient to repay consumers, there is no guarantee that the assets will be sufficient to guarantee that investors will be repaid in full;
- Capital growth. Consumers will receive on the maturity of their investments only the amount invested on a dollar for dollar basis;
- Ready access to their funds. Funds are invested for a fixed term, or on the basis of a 31 day notice period before withdrawal, and can be redeemed earlier only at the discretion of the Company;
- A longer term "set and forget" investment. The terms of the investments offered by the Company are comparatively short, with a maximum of 2 years, and require consumers prior to the maturity of their investment to elect whether to have their funds redeemed or to re-invest them with the Company;
- A no-risk, or very low risk investment. The Company's products are not comparable to bank deposits, and while the Trustee holds security for the repayment of the funds invested with the Company, there is no guarantee that the security will be sufficient to ensure all investors are repaid in full.
- A product suitable as an investment to form all or the greater part of their investment and asset portfolio. The risk profile of the Company's products means that they are best suited as part of a consumer's diversified asset and investment portfolio.

The Company has offered its products through prospectuses complying with the Corporations Act and regulations issued by the Australian Securities and Investments Commission for over 27 years, and is satisfied, by the ongoing demand for its products and the repeat investments by consumers, that the Company's products reach the target market and are consistent with the likely objectives, financial situation and needs of the class of consumers that comprises the target market.

## 2. Review Triggers

The Company will monitor and review the outcomes produced by the design and distribution of its products and consider whether changes are required to the products, to the way they are distributed and to whom they are being sold.

The Company will conduct a Review:

- (a) prior to the issue of a prospectus;
- (b) prior to the issue of a supplementary prospectus;
- (c) upon determination of an ASIC reportable significant dealing (as defined in paragraphs RG 274.158 – RG 274.161 of ASIC Regulatory Guide 274 Product design and distribution obligations);
- (d) within 10 business days if:
  - (i) there is a failure by the Company to comply with the terms on which its products were issued, the provisions of the Trust Deed between the Company and Melbourne Securities Corporation Limited (**Trust Deed**), or Chapter 2L of the Corporations Act 2001;
  - (ii) an event occurs which causes or could cause the monies outstanding on the Company's products or any of them to become immediately payable or the terms of the product to become immediately enforceable, or any other right or remedy under the terms of the products or the Trust Deed to become immediately enforceable;
  - (iii) a circumstance occurs that materially prejudices the Company or any of its subsidiaries or any security or charge included in or created by the products or the Trust Deed;
  - (iv) there is a substantial change in the nature of the Company's business;
  - (v) the Company sustains a material trading or capital loss;
  - (vi) the Company elects to employ any third party distribution channel; or
  - (vii) the Company receives a complaint that concerns the design or distribution of its products

Upon becoming aware of a Review Trigger, or a potential Review Trigger, the General Manager must within ten [10] business days provide to the Board all such information necessary for the Board to determine whether this TMD is no longer appropriate.

### **3. Distribution Conditions**

The Company distributes the prospectus for its products electronically through its own website, or in hard copy in response to requests made directly to the Company.

Only select representatives of the Company who have undergone internal training and have demonstrated their competency and knowledge of the Company's products and the target market for the products are able to distribute the products.

The Company does not provide financial advice. The Company ensures that its representatives provide consumers with factual information only, and make no recommendation or suggestion that consumers invest in the Company's products or in any other investment, and that any investment should be made on the basis of the prospectus and any independent financial advice the consumer may seek.

The Company also makes copies of its prospectus available to certain financial advisers, who provide the prospectus to their clients for the purpose of implementing personal advice that they have given to the client. The Company has given such financial advisers a copy of this TMD.

The Company has entered into an agreement with each of those financial advisers under which the financial adviser agrees that:

a) they will not provide the prospectus to any person other than in the course of implementing personal advice given to the person; and

b) they will advise the Company in writing within [3] business days of receiving any complaint from a client in relation to the suitability of the Company's products for them, specifying:

- (i) subject to the client's consent, the name of the client and their contact details;
- (ii) the nature of the complaint; and
- (iii) the date the complaint was received.

The Company does not otherwise employ any third-party distribution channels.

The Company has determined that the distribution conditions and restrictions will make it likely that consumers who invest in the Company's products are in the class of consumers for who the products are designed .

The Company considers that the distribution conditions are appropriate and will assist in directing distribution towards the target market.

### **4. Periodic Review**

In addition to any Review conducted as a result of the occurrence of a Review Trigger, the Company must conduct an annual review, to finish:

- (a) for the first review, on the day which starts 6 months from the date this TMD is made; and
- (b) for each subsequent Review, on the day which starts 6 months from the day the prior Review was finished.

### **5. Complaints Reporting**

The General Manager must at the end of each quarter in a financial year report to the Board in writing:

- (a) whether the Company received complaints in relation to the Company's products during the quarter; and
- (b) the number of complaints received (if any).
- (c) Significant dealings outside the target Market

Representatives must notify the General Manager as soon as practicable ( and no later than 7 business days ) after becoming aware of a significant dealing in the Company's products that is inconsistent with this TMD.