

Target market determination

Ruffer Total Return International – Australia Fund



JANUARY 2022

TARGET MARKET SUMMARY

This product is likely to be appropriate for a consumer seeking capital growth and capital preservation to be used as a core or satellite component within a portfolio where the consumer has a minimum five year investment timeframe, medium to high risk/return profile and needs weekly access to capital.

IDENTIFIERS

Issuer	The Trust Company (RE Services) Limited		
Issuer ABN	45003278831	Issuer AFSL	235150
ARSN	643278693	APIR code	PIM1038AU
ISIN	AU60PIM10382		
Fund name	Ruffer Total Return International – Australia Fund		
TMD status	Current	TMD version	2
TMD approved date	28 January 2022		
PDS link	ruffer.co.uk/rtri-au		

DISTRIBUTION CONDITIONS/RESTRICTIONS

DISTRIBUTION CONDITION	APPLICABLE	RATIONALE
There are no distribution conditions.	Yes	Not applicable
Only suitable for distribution to consumers who have received personal advice.	No	–
Only suitable for distribution through the following specified distributors or distribution channels (if any).	No	–
Other	No	–

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 in target market

INSTRUCTIONS

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

Definitions and guidance around important terms used in this TMD can be found in the Definitions section of this document.

INVESTMENT PRODUCTS AND DIVERSIFICATION

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 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 a product (including its key attributes).

TMD INDICATOR PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES

CONSUMER'S INVESTMENT OBJECTIVE

CONSUMER ATTRIBUTES	TMD INDICATOR	PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES
Capital growth	●	The investment objective of Ruffer Total Return International – Australia Fund is to achieve positive returns with low volatility from an actively managed portfolio. The Fund may have exposure to the following asset classes: cash, debt securities of any type (including government and corporate debt), equities and equity related securities and commodities (including precious metals). Overriding this objective is a fundamental philosophy of capital preservation.
Capital preservation	●	
Capital guaranteed	●	
Income distribution	●	

CONSUMER'S INTENDED PRODUCT USE

CONSUMER ATTRIBUTES	TMD INDICATOR	PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES
Solution/standalone (75-100%)	●	The Fund may be suitable for investors who see collective investment schemes as a convenient way of participating in investment markets. It may be suitable for investors wishing to achieve the defined investment objectives. Investors must be able to accept some risk to their capital, thus the Fund may be suitable for investors who are looking to set aside their capital for at least five years.
Core component (25-75%)	●	
Satellite/small allocation (<25%)	●	

INVESTMENT TIMEFRAME

CONSUMER ATTRIBUTES	TMD INDICATOR	PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES
Short (≤ 2 years)	●	The Fund may be suitable for investors who are looking to set aside their capital for at least five years.
Medium (> 2 years ≤ 8 years)	●	
Long (> 8 years)	●	

CONSUMER'S RISK (ABILITY TO BEAR LOSS) AND RETURN PROFILE

CONSUMER ATTRIBUTES	TMD INDICATOR	PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES
Low	●	The Fund seeks low volatility returns and has an underlying philosophy of capital preservation.
Medium	●	
High	●	
Very high	●	

CONSUMER'S NEED TO WITHDRAW MONEY

CONSUMER ATTRIBUTES	TMD INDICATOR	PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES
Daily	●	The consumer seeks to invest in a product which permits redemption requests weekly.
Weekly	●	
Monthly	●	
Quarterly	●	
Annually or longer	●	

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 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. Based on the issuer's assessment of the product, there are no specific distribution conditions required.

REVIEW PROCESSES

REVIEW TRIGGERS

- 1 Material change to key attributes, fund investment objective and/or fees.
- 2 Material deviation from benchmark / objective over sustained period.
- 3 Key attributes have not performed as disclosed by a material degree and for a material period.
- 4 Determination by the issuer of an ASIC reportable Significant Dealing.
- 5 Material or unexpectedly high number of complaints

(as defined in section 994A(1) of the Act) about the product or distribution of the product.

- 6 The use of Product Intervention Powers, regulator orders or directions that affects the product.

MANDATORY REVIEW PERIODS

Review period	Maximum period for review
Initial review	12 months after TMD date
Subsequent review	15 months

DISTRIBUTOR REPORTING REQUIREMENTS

If practicable, Distributors should adopt the FSC data standards for reports and provide them via email to the Issuer at DDO@perpetual.com.au and to the Investment Manager at product@ruffer.co.uk

REPORTING REQUIREMENT	REPORTING PERIOD	APPLICABILITY
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.	Reports are to be sent quarterly, within 10 business days of the end of the calendar period.	Yes
Significant dealing outside of target market, under s994F(6) of the Act. See definitions for further details.	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	Yes
To the extent a distributor is aware of dealings outside the target market these should be reported to the issuer, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	Reports are to be sent quarterly, within 10 business days of the end of the calendar period.	Yes

DISCLAIMER

This Target Market Determination (TMD) has been produced by the Issuer identified in this document solely for the purpose of meeting the requirements under section 994B of the Corporations Act 2001 (Cth). This TMD sets out the class of consumers for which this product, including its key attributes, would likely be consistent with their likely objectives, financial situation and needs. It also outlines the distribution conditions and restrictions imposed on distribution of the product, as well as reporting requirements for distributors. The Issuer has elected to adopt the TMD template established through the Financial Services Council (FSC). If you have any queries regarding the contents of the TMD or would like to request a copy of a prior version, please contact the Issuer on 02 9229 9000 or DDO@perpetual.com.au or call the Investment Manager on 02 9229 9000. This document is not a Product Disclosure Statement and does not provide a

full summary of the product features or terms of the product. This TMD is not to be used except for the purpose of a regulated person complying with their obligations under Part 7.8A of the Corporations Act 2001 (Cth). To the extent permitted by law, no liability is accepted for any loss or damage as a result of any reliance on this information. This document is not intended to provide you with financial advice or take into account your objectives, financial situation or needs. You should consider whether the information is suitable for your circumstances. Before making any investment decision in respect of the product, you should consider obtaining financial advice. The Product Disclosure Statement (PDS) for the product should be considered before deciding whether to acquire, or to continue to hold, the product. To obtain a copy of the PDS please visit ruffer.co.uk/rtri-au or contact the Investment Manager on 02 9229 9000.

DEFINITIONS

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 downturn. 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 investable assets (see definition below). The consumer typically prefers exposure to a product with at least High portfolio diversification (see definitions below).
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 (<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 investable assets (see definition below). The consumer is likely to be comfortable with exposure to a product with Low portfolio diversification (see definitions below).
Investable assets	Those assets that the investor has available for investment, excluding the residential home.

PORTFOLIO DIVERSIFICATION (for completing key product attribute section of consumer's intended product use)

Low	Single asset class, single country, low or moderate holdings of securities – eg high conviction Aussie equities.
Medium	1-2 asset classes, single country, broad exposure within asset class, eg Aussie equities 'All Ords'.
High	Highly diversified across either asset classes, countries or investment managers, eg Australian multimanager 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 ≤8 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.

DEFINITIONS

CONSUMER'S RISK (ABILITY TO BEAR LOSS) AND RETURN PROFILE

Issuers should undertake a comprehensive risk assessment for each product. The FSC strongly recommends adoption of the Standard Risk Measure (SRM) to calculate the likely number of negative annual returns over a 20 year period, using the guidance and methodology outlined in the Standard Risk Measure Guidance Paper For Trustees. 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 or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. Issuers may wish to supplement the SRM methodology by also considering other risk factors. For example, some products may use leverage, derivatives or short selling, may have liquidity or withdrawal limitations, 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	The consumer is conservative or low risk in nature, seeks to minimise potential losses (eg has the ability to bear up to one negative return over a 20 year period (SRM 1 to 2)) and is comfortable with a low target return profile. Consumer typically prefers defensive assets such as cash and fixed income.
Medium	The consumer is moderate or medium risk in nature, seeking to minimise potential losses (eg has the ability to bear up to four negative returns over a 20 year period (SRM 3 to 5)) and comfortable with a moderate target return profile. Consumer typically prefers a balance of growth assets such as shares, property and alternative assets and defensive assets such as cash and fixed income.
High	The consumer is higher risk in nature and can accept higher potential losses (eg has the ability to bear up to six 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 (eg has the ability to bear six 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

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 (eg 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.
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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 or amber 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 reporting period
- the consumer's intended product use is Solution/Standalone or
- the consumer's intended product use is Core component and the consumer's risk (ability to bear loss) and return profile is Low.