



ECP Global Growth Fund (Aust)

Target Market Determination

Legal Disclaimer

This Target Market Determination (TMD) is required under section 994B of the Corporations Act 2001 (Cth) (the Act). It sets out the class of consumers for whom the product, including its key attributes, would likely be consistent with their likely objectives, financial situation and needs. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of the Issuer's design and distribution arrangements for the product.

This document is **not** a product disclosure statement and is **not** a 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 latest information memorandum before making a decision whether to buy this product.

Target Market Summary

This product is likely to be appropriate for a consumer seeking long term capital growth and income via an actively managed portfolio of global growth companies, to be used as a small allocation within a portfolio where the consumer has a medium to long term investment timeframe, medium risk/return profile and who may require reasonable access to the invested capital.

Entity identifiers

Issuer	EC Pohl & Co RE Ltd
Issuer ABN	41 671 793 365
Product	ECP Global Growth Fund (Aust)
ARSN	679 892 285
APIR Code	ECP6796AU
Market Identifier Code	N/A
Date TMD approved	11/03/2026
TMD Version	4.1
<i>TMD Status</i>	<i>Current</i>
TMD end date	11/06/2029

Description of Target Market

This part is required under section 994B(5)(b) of the Act.

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 considered in target market
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Instructions to Distributor

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.

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.

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).

Consumer Attributes <i>[A description of the likely objectives, financial situation and needs of the class of consumers in the target market]</i>	TMD Indicator	Product description including key attributes <i>[A description of the product, including its key attributes, i.e., product terms, features and attributes that affect the TMD]</i>
Consumer's investment objective		
Capital Growth	In target market	<p>The ECP Global Growth Fund (Aust) (ECPGGFAU) is a registered managed fund with exposure to diversified global investments. ECPGGFAU aims to increase investors wealth by achieving capital growth over the medium to long term.</p> <p>The investment philosophy is based on the belief that the economics of business drives long-term investment returns. ECPGGFAU believes that investing in high-quality businesses in their growth stage of their lifecycle, that demonstrate the ability to generate predictable, above-average economic returns, will produce superior investment performance over the long-term.</p> <p>The Fund aims to outperform the MSCI World Index in AUD by 2-4% over a rolling five-year time frame.</p> <p>Suitable investors include:</p> <ul style="list-style-type: none"> • Investors seeking capital growth through a diversified exposure to global companies. • Investors seeking an active investment approach. • Those with an investment horizon of five years or more
Capital Preservation	Potentially in target market	
Capital Guaranteed	Not considered in target market	
Income Distribution	Not considered in target market	
Consumer's intended product use (% of Investable Assets)		
Solution/Standalone (75-100%)	Not considered in target market	<p>ECPGGFAU is designed for use as a satellite component of an investor's broader portfolio of investments, up to 25% of their total investable assets.</p> <p>ECPGGFAU invests in 12 – 40 listed global companies, maintaining 0-20% cash in the portfolio.</p>
Core Component (25-75%)	Not considered in target market	
Satellite/small allocation (<25%)	In target market	

Consumer Attributes <i>[A description of the likely objectives, financial situation and needs of the class of consumers in the target market]</i>	TMD Indicator	Product description including key attributes <i>[A description of the product, including its key attributes, i.e., product terms, features and attributes that affect the TMD]</i>
Consumer's investment timeframe		
Short (≤ 2 years)	Not considered in target market	An investment in ECPGGFAU should be made with a 5-year minimum time horizon.
Medium (> 2 years)	Potentially in target market	
Long (> 5 years)	In target market	
Consumer's Risk (ability to bear loss) and Return profile		
Low	Not considered in target market	The likelihood of an investment in ECPGGFAU going down in the short term is moderate to high compared to direct investments in fixed interest or cash. The investor 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.
Medium	Potentially in target market	
High	In target market	
Very High	Potentially in target market	
Consumer's need to withdraw money		
Daily	In target market	Units in ECPGGFAU can be redeemed daily subject to the redemption terms.
Weekly	In target market	
Monthly	In target market	
Quarterly	In target market	
Annually or longer	In target market	

Appropriateness

Note: This section is required under RG 274.64–66.

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.

Distribution conditions/restrictions

This part is required under section 994B(5)(c) of the Act.

Distributors this condition applies to	Distribution Conditions	Distribution condition rationale
Issuer - Direct Channels	<p>Financial Product Advice or Target Market Determination questionnaire Consumers applying to invest directly in the Fund must either:</p> <ol style="list-style-type: none"> 1. Have received personal financial product advice to acquire the Fund, or; 2. Successfully complete the Target Market Determination questionnaire contained within the application process to assess their investor suitability. This questionnaire must screen the consumer's self-assessed risk profile, investment timeframe, and product use (% of investable assets) against the corresponding attributes specified in the relevant Fund's TMD. 	<p>Personal Advice: This ensures that persons providing personal financial product advice comply with the best interests duty and related obligations, which requires consideration of the consumer's individual objectives, financial situation, and needs.</p> <p>Target Market Determination questionnaire: This is a key and robust non-reliance step that provides the Issuer with an immediate, specific control to screen consumers. It assists the Issuer in identifying where a consumer's attributes (particularly risk tolerance) align with the specific fund's target market and helps to prevent acquisition by consumers likely to experience harm.</p>
	<p>Product and DDO Training The Issuer's distribution marketing staff are required to undergo training on the principles of the DDO regime and the requirement to prevent distribution inconsistent with the TMD.:</p>	<p>Product and DDO Training This condition makes it highly likely that the Issuer's staff are equipped with the knowledge necessary to identify consumers who are outside the target market for the Fund.</p>

	<p>Marketing, Advertising & Promotion No marketing, advertising, or promotional materials relating to the Fund may be disseminated by the Issuer until a review has been completed under the relevant policies.</p>	<p>Marketing, Advertising & Promotion This ensures that promotional messaging is consistent with the risk profile and target market of the underlying product, preventing misrepresentation or inadvertently directing marketing efforts towards consumers whose risk/return profile would be incompatible with the fund being promoted</p>
<p>Third-Party Distribution (e.g., Platforms)</p>	<p>Legal Obligations All third-party distributors, including investment platform operators, must meet all ongoing regulatory and disclosure obligations applicable to their operations and any other relevant legislation or standards.</p> <p>Financial advisers accessing the Fund via a platform must hold an Australian Financial Services License (AFSL) or be an authorised representative of an AFSL holder. They must also comply with any onboarding, due diligence, and accreditation requirements set by the Issuer.</p> <p>Where distribution occurs through a platform, the platform operator must ensure that:</p> <ul style="list-style-type: none"> • the Fund is made available only to investors who meet the relevant platform eligibility criteria and TMD-related conditions; and • required product and TMD information provided by the Issuer is made available to advisers and retail clients. 	<p>Legal Obligations In relation to investment platforms, custodians, and financial advisers, the Issuer has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because:</p> <ul style="list-style-type: none"> • Each platform provider, custodian, or other intermediary acting as a distributor has its own obligations to take reasonable steps to ensure retail product distribution conduct is consistent with this TMD. • Where the Fund is issued as part of personal financial product advice, the financial adviser's standard advice process ensures suitability is assessed having regard to the client's objectives, financial situation, and needs. • Where investments are made without personal advice, platform providers generally require clients to complete filtering or investor-declaration questions that assist in determining whether the consumer falls within the target market. • The Issuer's periodic review of platform distribution activity, significant dealing reports, and complaints data provides assurance that platform distribution remains consistent with the TMD.
	<p>Marketing Material Consistency Third-party distributors, including those operating under the Issuer's banner, must exclusively use or adapt marketing, advertising, and promotional materials that are consistent with the latest version of the Issuer's pre-approved external communications.</p>	<p>Marketing Material Consistency This prevents inconsistent or misleading promotional activity by third parties that could lead to distribution outside of the intended target market, maintaining a singular, compliant message across all distribution channels.</p>

Review triggers
This part is required under section 994B(5)(d) of the Act.
Material change to key attributes, fund investment objective and/or fees.
Material deviation from 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 review periods	
This part is required under section 994B(5)(e) and (f) of the Act.	
Review period	Maximum period for review
Initial review	1 year and 3 months
Subsequent review	3 years and 3 months

Distributor reporting requirements		
This part is required under section 994B(5)(g) and (h) of the Act.		
Reporting requirement	Reporting period	Which distributors this requirement applies to
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.	Within 10 business days following end of calendar quarter.	All distributors
Significant dealing outside of target market, under s994F(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

To the extent a distributor is aware, dealings outside the target market, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	Within 10 business days following end of calendar quarter.	All distributors
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If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to the Issuer using the agreed methodology. Contact details relating to this TMD are: fund-admin@ecpohl.com

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, 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 <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least High <i>portfolio diversification</i> (see definitions below).
Core Component (25-75%)	The consumer intends to hold the investment as a major component, up to 75%, of their total <i>investable assets</i> (see definition below). The consumer typically prefers exposure to a product with at least Medium <i>portfolio diversification</i> (see definitions below).

Term	Definition
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 <i>investable assets</i> (see definition below). The consumer is likely to be comfortable with exposure to a product with <i>Low portfolio diversification</i> (see definitions below).
Investable Assets	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)	
Low	Single asset class, single country, low or moderate holdings of securities - e.g. high conviction Aussie equities.
Medium	1-2 asset classes, single country, broad exposure within asset class, e.g. Aussie equities "All Ords".
High	Highly diversified across either asset classes, countries or investment managers, e.g. Australian multi-manager 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)	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.
Consumer's Risk (ability to bear loss) and Return profile	
<p>Issuers should undertake a comprehensive risk assessment for each product. It is recommended to adopt 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 <u>Standard Risk Measure Guidance Paper For Trustees</u>. 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.</p> <p>A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.</p>	
Low	<p>The consumer is conservative or low risk in nature, 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>

Term	Definition
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>
High	<p>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.</p> <p>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.</p>
Very high	<p>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).</p> <p>Consumer typically prefers growth assets such as shares, property and alternative assets.</p>
Consumer's need to withdraw money	
<p>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 (e.g. ability to stagger or delay redemptions) could impact this, this is to be taken into consideration in completing this section.</p>	
Daily/Weekly/Monthly/Quarterly/Annually or longer	<p>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.</p>
Distributor Reporting	
Significant dealings	<p>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>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>Dealings outside this TMD may be significant because:</p> <ul style="list-style-type: none"> • they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or

Term	Definition
	<ul style="list-style-type: none"> • 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). <p>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> • 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). <p>Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if:</p> <ul style="list-style-type: none"> • 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 <i>Solution / Standalone</i>, or • the consumer’s intended product use is <i>Core component</i> and the consumer’s risk (ability to bear loss) and return profile is <i>Low</i>.