

## Target Market Determination

### Bombora Special Investments Growth Fund (the “Product”)

#### 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 Cache (RE Services) Ltd (**Responsible Entity** and **Issuer**) 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 Product Disclosure Statement (**PDS**) and the associated Reference Guide (**RG**) for the Product before making a decision whether to buy this product, which can be found at <https://www.bomboragroup.com.au/for-fund-investors/>.

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.

## Target Market Summary

This product is likely to be appropriate for a consumer seeking capital growth to be used as a satellite/small allocation of their portfolio where the consumer has a long investment timeframe and very high risk/return profile.

## Fund and Issuer identifiers

<b>Issuer</b>	Cache (RE Services) Ltd	<b>ISIN Code</b>	AU60BIM84148
<b>Issuer ABN</b>	84 616 465 671	<b>Market Identifier Code</b>	N/A
<b>Issuer AFSL</b>	494886	<b>Product Exchange code</b>	N/A
<b>Fund</b>	Bombora Special Investments Growth Fund	<b>Date TMD approved</b>	20 December 2024
<b>ARSN</b>	667 101 564	<b>TMD Version</b>	1
<b>APIR Code</b>	BIM8414AU	<b>TMD Status</b>	Current

## 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
------------------	------------------------------	---------------------------------

### Instructions

In the tables below:

- **Consumer Attributes**, indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering this product.
- **TMD indicator**, indicates whether a consumer meeting the attribute 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	TMD Indicator	Product description including key attributes
Consumer’s investment objective		
Capital Growth		The Bombora Special Investments Growth Fund strategy is to invest in Pre-IPO Securities and small/microcap Listed Equities. It is targeted that 60% to 80% of the portfolio is invested in between 10 – 30 companies where Bombora Investment Management Pty Limited employees are actively involved in the governance of the entity.  The investment objective of the Fund is to achieve strong risk-adjusted returns over the medium to long term.
Capital Preservation		
Capital Guaranteed		
Income Distribution		
Consumer’s intended product use (% of Investable Assets)		
Solution/Standalone (75-100%)		At any given time, the Fund targets to hold between 20 and 60 investments, with a maximum of 8% of the Portfolio NAV held in any one position (at time of purchase).  As the typical target investment (when listed) may be classified as a 'microcap' (\$10m to \$300m market capitalization) the Fund has been classified as having Low portfolio diversification.
Core Component (25-75%)		
Satellite/small allocation (<25%)		
Consumer’s investment timeframe		
Short (≤ 2 years)		The minimum suggested timeframe for holding investments in the Fund is 3-5 years (as consistent with the Fund’s PDS). This strategy seeks to find long term investments in tomorrow’s leaders. Gearing may be used.
Medium (> 2 years)		
Long (> 8 years)		
Consumer’s Risk (ability to bear loss) and Return profile		
Low		The Fund has a risk band of 7 (Very High).
Medium		
High		
Very High		
Consumer’s need to withdraw money		
Daily		The Fund is not expected to be liquid (as defined in the Corporations Act).

Weekly		<p>In certain circumstances and depending on the Responsible Entity (at its discretion) being satisfied that the Fund has sufficient cash and other assets available to meet open redemption requests, the Responsible Entity will make monthly withdrawal offers, in which it will pay redemptions within one month of a request being submitted (with the request having to have been submitted 10 days prior to the Withdrawal Day (refer to the PDS for additional information). Currently, based on the recommendation of the Fund's Investment Manager, no redemptions are expected to be made by prior to 30 June 2024.</p> <p>In the event the Fund is determined to be liquid (as defined by the Corporations Act), should redemption requests exceed 20% of the NAV of the Fund, or at the Responsible Entities discretion, the Responsible Entity may restrict redemptions. Refer to the PDS for additional information, noting that the Fund is not currently determined to be liquid.</p>
Monthly		
Quarterly		
Annually or longer		

#### 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 the table above are likely to be suitable for consumers with the attributes identified with a green TMD Indicator.**

#### **The Consumer Target Market for this product will include:**

- 1. Those seeking Capital Growth in the Medium to Long Term with a high risk tolerance and is allocating a small or satellite allocation of investable assets**

#### **The Consumer Target Market will exclude:**

- 1. Individuals that will rely on this product to generate income to maintain their lifestyle.**
- 2. Individuals that would have a significant detriment should monthly redemptions offers not be made.**

#### Distribution conditions/restrictions

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

Distribution Condition	Distribution Condition Rationale
Suitable for distribution to consumers who have received personal advice; or	Distribution is permitted if the distribution is implemented in the course of the investor receiving personal advice from the distributor or a licensed financial adviser where the adviser best interest and other duties apply.
Suitable for consumers who meet the definition of 'Wholesale Client' under the Corporations Act 2001.	Wholesale Clients are typically better informed and better able to assess the risks involved in financial transactions <sup>1</sup> . Accordingly, they should be better able to assess whether an investment in the Fund is appropriate to their personal circumstances.

#### 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 fund strategy / 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 (ASIC) 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 6 months
Subsequent review	3 years and 6 months

<sup>1</sup> Commonwealth of Australia, Explanatory Memorandum, Financial Services Reform Bill 2001, para 2.27 (Paraphrased).

<b>Distributor reporting requirements</b> <i>This part is required under section 994B(5)(g) and (h) of the Act.</i>		
<b>Reporting requirement</b>	<b>Reporting period</b>	<b>Which distributors this requirement applies to</b>
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 the end of the calendar quarter.	All distributors

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to the Issuer using the method specified on this website: [www.fsciml.com.au/reporting](http://www.fsciml.com.au/reporting). This link also provides contact details relating to this TMD for the Issuer.

*The material contained within this TMD has been prepared by Bombora Investment Management Pty Ltd (ACN 625 413 390, authorised representative 001313065 of Cache Investment Management Ltd ACN 624 306 430 AFSL 514 360) (**Bombora**) and Cache (RE Services) Ltd (ABN 26 611 839 519, AFSL 494886) (**Cache RE**) as Issuer and Responsible Entity of the Fund.*

*The Report is not intended to provide advice to investors or take into account an individual's financial circumstances or investment objectives. This is general investment advice only and does not constitute advice to any person. Neither Cache RE nor Bombora guarantee repayment of capital or any particular rate of return from the Fund. Neither Cache RE nor Bombora gives any representation or warranty as to the reliability, completeness or accuracy of the information contained in this TMD. Investors should consult their financial adviser in relation to any material within this document. Past performance is not a reliable indicator of future performance. Investors should consider the PDS and any other material published by Cache RE or Bombora in deciding whether to acquire units in the Fund. This information is available at <https://www.bomboragroup.com.au/for-fund-investors/>.*

## Definitions

Term	Definition
<b>Consumer's investment objective</b>	
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).
<b>Consumer's intended product use (% of Investable Assets)</b>	
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).
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 Low <i>portfolio diversification</i> (see definitions below).
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.
<b>Portfolio diversification (for completing the key product attribute section of consumer's intended product use)</b>	
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".

Term	Definition
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).
<b>Consumer's intended investment timeframe</b>	
Short ( $\leq 2$ 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.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>	
<p>Issuers should undertake a comprehensive risk assessment for each product. The FSC recommends adoption of the Standard Risk Measure (<b>SRM</b>) to calculate the likely number of negative annual returns over a 20 year period, using the guidance and methodology outlined in the <b><u>Standard Risk Measure Guidance Paper For Trustees</u></b>. 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>
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>

Term	Definition
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>
<b>Consumer's need to withdraw money</b>	
<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>

Term	Definition
<b>Distributor Reporting</b>	
<b>Significant dealings</b>	<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"> <li>• they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or</li> <li>• 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>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> <li>• the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes),</li> <li>• 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>• 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).</li> </ul> <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"> <li>• it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the reporting period,</li> <li>• the consumer's intended product use is Solution / Standalone, or</li> <li>• the consumer's intended product use is Core component and the consumer's risk (ability to bear loss) and return profile is Low.</li> </ul>