

Target Market Determination

Adamas Capital Diversified Fund

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 from www.adamascapital.com.au/acdf.

Target Market Summary

This product is intended for use as a Minor or Satellite allocation for a consumer who is seeking Capital Growth and Income Distribution and has a 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 at least a 5 year investment timeframe and is unlikely to be suitable for a consumer who requires access to their capital other than in response to the five-yearly Periodic Withdrawal Opportunities.

Fund and Issuer identifiers

Issuer	One Managed Investment Funds Ltd
Fund name	The Adamas Capital Diversified Fund

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ARSN	674 039 402
APIR Code	OMF6286AU
Issuer ABN	47 117 400 987
Issuer AFSL	297042
Fund manager	Adamas Capital Investment Management Pty Ltd ACN 666 770 163
TMD contact details	DDO@oneinvestment.com.au
TMD issue date	20 February 2024
TMD Version	V1
Distribution status of fund	Available

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.

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	See Issuer's instructions	Not in target market
	Please see the 'Product description including key attributes' in the table below for Issuer instructions.	

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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](#).



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Consumer Attributes	TMD indicator	Product description including key attributes
Consumer's investment objective		
Capital Growth	In target market	<p>The investment objective of the Fund is to provide investors with positive absolute returns through exposure to a broad range of investments over a medium to long-term horizon with an aim that the portfolio of assets is optimally positioned to weather market downturns and outperform in benign market conditions. The Fund aims to provide investors with a return (including capital growth and distributions) of 9% p.a. (net of fees and costs but before tax and any performance fee), however the target return rate will be adjusted over time in accordance with market forces.</p> <p>The Fund intends to make quarterly distributions to investors (which may include either or both income or capital). However, distributions are not guaranteed and are subject to receipt of interest, distribution, dividends, rental income and other payments from underlying investments.</p> <p>The Fund is not suitable for an investor seeking its capital to be guaranteed.</p>
Capital Preservation	Not in target market	
Income Distribution	In target market	
Capital Guaranteed	Not in target market	
Consumer's intended product use (% of Investable Assets)		
Solution/Standalone (up to 100%)	Not in target market	<p>The Fund aims to achieve its investment objective by investing in a diversified portfolio of eleven asset categories in five major asset classes, including equities, real estate, fixed income, mortgage securities and cash. Once the Fund reaches scale (\$100 million), the Fund aims to hold a portfolio of between 20 and 75 investments at any given time. Therefore, the Fund's portfolio diversification is expected to be Medium to High (see diversification definitions on page 12 of this TMD).</p> <p>However, the Fund represents an investment that is concentrated within a single product managed by one fund manager and therefore it is recommended investors should use the Fund as a Minor or Satellite allocation to spread risk across a broad portfolio of products and fund managers.</p>
Major allocation (up to 75%)	Not in target market	
Core component (up to 50%)	See Issuer's instructions	
Minor allocation (up to 25%)	In target market	
Satellite allocation (up to 10%)	In target market	

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Consumer Attributes	TMD indicator	Product description including key attributes
		Investors may also use the Fund as a Core allocation where an investor has a high conviction to the Fund manager and its strategy for the Fund.
Consumer's investment timeframe		
Minimum investment timeframe	Minimum of 5 years	<p>The Fund is managed with the intention of generating returns over the Medium to Long term. The minimum suggested investment framework for holding investment in the Fund is 5 years. The Fund has rolling five-year terms, and the Issuer intends to provide a Periodic Withdrawal Opportunity at the end of each term. It may take up to 12 months to satisfy redemptions requested following the offer of a Periodic Withdrawal Opportunity.</p> <p>It is also expected that a Limited Monthly Redemption Facility will be available to investors. These are not guaranteed and requests above 3% of the Fund's net asset value will be scaled back. The Fund is therefore not suitable for investors who require access to their capital prior to the next Periodic Withdrawal Opportunity around February 2029.</p>
Consumer's Risk (ability to bear loss) and Return profile		
Low	Not in target market	<p>The Fund aims to provide investors with the target return referred to above, however, as with all investments, an investment in the Fund is subject to risks, including the risk capital invested will be lost and distributions will not be paid. See the PDS for information about the key risks of the Fund.</p> <p>The target asset allocation strategy of the Fund is designed to provide exposure to a balance of growth and income assets. The portfolio is also invested across five assets classes with differing risk profiles. For example, based on a typical asset allocation as set out in the PDS, the Fund will be invested in asset classes with varying risk profiles ('low' to 'very high').</p> <p>It is expected the Fund may experience an estimated up to 4.5 negative returns over a 20-year period (SRM 5-6) on an allocation-weighted basis.</p>
Medium	Not in target market	
High	In target market	
Very high	See Issuer's instructions	
Extremely high	Not in target market	

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Consumer Attributes	TMD indicator	Product description including key attributes
		<p>The majority of the Fund’s capital is expected to be invested in assets with up to a ‘high’ risk/return profile. Therefore, the Fund is considered suitable for investors who have a High risk/return appetite.</p> <p>The Fund may also be appropriate for investors seeking a product offering a Very high level of risk/return if it is used as a Satellite allocation.</p>
Consumer’s need to access capital		
Daily	Not in target market	<p>The Fund will remain open for investment and intends to offer both a Limited Monthly Redemption Facility each month and Periodic Withdrawal Opportunities every five years commencing February 2029. However, the ability to withdraw from the Fund is dependent on the liquidity of the Fund’s investments from time to time and is not guaranteed.</p> <p>The withdrawal mechanism described below assumes the Fund will be considered Liquid (as that term is defined in the Act). The Investment Manager expects the Fund will be Liquid at all times.</p> <p>While the Fund is Liquid, it is intended a Periodic Withdrawal Opportunity will be held every five years and this is the main mechanism for investors to redeem Units. The first Periodic Withdrawal Opportunity is expected to be held around February 2029 and every five years thereafter. Redemption requests received for a Periodic Withdrawal Opportunity are aimed to be satisfied within 12 months of the closing date of the Periodic Withdrawal Opportunity.</p> <p>While the Fund is Liquid, it is anticipated Limited Monthly Redemption Facilities will generally be held every month and these are a secondary, limited, mechanism for investors to redeem Units. It is expected that, the amount available to meet withdrawal requests in any month will be an amount up to 3% of the Fund’s net asset value in aggregate (provided the Issuer considers such an amount is appropriate, given the Fund’s future cash requirements and its ability to readily realise assets to the extent necessary to provide the necessary liquidity).</p> <p>Investors should not rely on Limited Monthly Redemption Facilities as a means of liquidity.</p>
Weekly	Not in target market	
Monthly	Not in target market	
Quarterly	Not in target market	
At issuer discretion	In target market	

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Consumer Attributes	TMD indicator	Product description including key attributes
		<p>Withdrawal requests made under the Limited Monthly Redemption Facilities may be scaled back and depending on market conditions, may not be offered.</p> <p>Therefore, the Fund is not suitable for investors who need to access capital other than in response to the next Periodic Withdrawal Opportunity expected to be around February 2029.</p>

Distribution conditions/restrictions

Distribution conditions	Distribution condition rationale	Distributors this condition applies to
<p>Retail investors who receive personal advice may invest in the Fund provided:</p> <ul style="list-style-type: none"> - the retail investor completes the on-line application form or paper based application form and confirms they have received personal advice; and - the distributor provides details of their AFS licence and confirms they have reviewed and considered the TMD in providing personal advice to the retail investor. 	<p>The provision of personal advice is excluded conduct for the purposes of taking reasonable steps in relation to distribution.</p> <p>A retail investor receiving personal financial product advice from an appropriately authorised distributor will have received advice that an investment in the Fund is appropriate having regard to their individual objectives, financial situation or needs.</p> <p>The distributor will also have been required to comply with the best interests' duty and related obligations under Pt 7.7A of the Act.</p>	<p>Distributors who are licenced to provide personal advice to retail clients.</p>
<p>The Fund is available through specified distributors or distribution channels such as investment or super platforms or wrap products (platforms).</p>	<p>The Issuer of each platform product has its own obligations as a distributor to take reasonable steps that will or are reasonably likely to result in retail</p>	<p>Distributors who are operators of investment or super platform or wrap</p>

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Distribution conditions	Distribution condition rationale	Distributors this condition applies to
	<p>product distribution conduct being consistent with this TMD.</p> <p>Clients who have not received personal advice are not able to access the Fund unless the platform or wrap provider has a process where the client is asked filtering questions relating to the TMD.</p>	<p>products.</p>
<p>Retail investors who have not received personal advice may only invest in the Fund by:</p> <ul style="list-style-type: none"> - completing the on-line application form; - completing the filtering questions; and - reading alerts, which in certain circumstances, notify the investor they may not be within the target market for the Fund and prompt the investor to seek further advice before progressing with the application. 	<p>Retail investors who apply to invest in the Fund directly must answer filtering questions relating to the TMD. The filtering questions have been designed to assist the Issuer to assess whether it is likely the investor is in the target market for the Fund.</p> <p>The Issuer will review the information provided in response to the filtering questions, assess those answers against the Fund's key attributes (set out above). Where the Issuer concludes the investor is not likely to be within the target market, the Issuer may reject the application or seek further information from the investor.</p> <p>The Issuer also uses these answers to analyze the extent of any distribution outside of the Fund's identified target market.</p>	<p>Distributors who are not licenced to provide personal advice to retail clients.</p>
<p>Wholesale investors (being those that provide relevant evidence in their application form that they are within the definition of wholesale client under section 761G(7) of the Act) may invest in the Fund by</p>	<p>The Design and Distribution Obligations and this TMD does not apply to financial products acquired by wholesale investors.</p>	<p>All distributors</p>

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Distribution conditions	Distribution condition rationale	Distributors this condition applies to
completing the on-line application form without taking any further steps.		

Review triggers

Material change to key attributes, Fund investment objective and/or fees.
Material deviation from the stated investment objective (including the target return, number of investments and assets allocations) over a sustained period of at least 12 months.
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 Fund or distribution of the Fund.
The use of Product Intervention Powers, regulator orders or directions that affects the Fund.
The Limited Monthly Redemption Facility has not been made available for two consecutive months.
A scheduled five-yearly Periodic Withdrawal Opportunity is not expected to be, or is not, offered.
Liquidity has not been provided for all investors wishing to redeem their investment within 12 months of a five-yearly Periodic Withdrawal Opportunity.

Mandatory TMD review periods

Review period	Maximum period for review
Initial review	1 Year
Subsequent review	1 Year from the date of the previous review (for whatever reason)

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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 in any case within 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 in any case within 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 One Managed Investment Funds Ltd using the method specified <https://oneinvestment.com.au/ddo/>

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Definitions

In some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Term	Definition
Consumer's investment objective	
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).
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.
Consumer's intended product use (% of Investable Assets)	
Solution/Standalone (up to 100%)	The consumer may hold the investment as up to 100% of their total <i>investable assets</i> . The consumer is likely to seek a product with <i>very high</i> portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>high</i> portfolio diversification.
Core Component (up to 50%)	The consumer may hold the investment as up to 50% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>medium</i> portfolio diversification.

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Term	Definition
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>low</i> portfolio diversification.
Satellite allocation (up to 10%)	The consumer may hold the investment as up to 10% of the total <i>investable assets</i> . The consumer may seek a product with <i>very low</i> portfolio diversification. 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.
Portfolio diversification (for completing the key product attribute section of consumer's intended product use)	
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 <u>and</u> geographic markets with limited correlation to each other.
Consumer's intended investment timeframe	
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.
Consumer's Risk (ability to bear loss) and Return profile	

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Term	Definition
	<p>This TMD uses the Standard Risk Measure (SRM) 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 <u>Standard Risk Measure Guidance Paper For Trustees</u> (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"> • has a conservative or low risk appetite, • 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 • is comfortable with a low target return profile. <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"> • has a moderate or medium risk appetite, • 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 • is comfortable with a moderate target return profile. <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"> • has a high risk appetite, • 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 • seeks high returns (typically over a medium or long timeframe). <p>The consumer typically prefers growth assets (for example, shares and property).</p>

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Term	Definition
Very high	<p>For the relevant part of the consumer’s portfolio, the consumer:</p> <ul style="list-style-type: none"> • has a very high risk appetite, • 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 • seeks to maximise returns (typically over a medium or long timeframe). <p>The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).</p>
Extremely high	<p>For the relevant part of the consumer’s portfolio, the consumer:</p> <ul style="list-style-type: none"> • has an extremely high risk appetite, • can accept significant volatility and losses, and • seeks to obtain accelerated returns (potentially in a short timeframe). <p>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	
<p>This consumer attribute addresses the likely period of time investors will be able to request 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.</p>	

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Term	Definition
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 • 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 and/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 quarter, • the consumer’s intended product use is <i>solution/standalone</i>, • 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 • the relevant product has a green rating for consumers seeking <i>extremely high risk/return</i>.

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Disclaimer

This document is issued by One Managed Investment Funds Limited (ABN 47 117 400 987) (AFSL 297042) (**OIG**) as responsible entity of the The Adamas Capital Diversified Fund ARSN 674 039 402 (**Fund**). Adamas Capital Investment Management Pty Ltd ACN 666 770 163 is the investment manager of the Fund (**Investment Manager**).

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You should obtain and carefully consider the Product Disclosure Statement (**PDS**) for the Fund before making any decision about whether to acquire, or continue to hold, an interest in the Fund. Applications for units in the Fund can only be made pursuant to the application form relevant to the Fund. A copy of the PDS dated 20 February 2024 continuous disclosure notices and relevant application form may be obtained from www.adamascapital.com.au/acdf.

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