

TARGET MARKET DETERMINATION

Butler McIntyre Investments Ltd
ACN 091 407 046
responsible entity for the Butler McIntyre Mortgage Fund

Target Market Determination – Butler McIntyre Mortgage Fund (Product)

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**Corporations 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 Butler McIntyre Investment Ltd ACN 091 407 046 (**BMI**)'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 the Product should carefully read the Product Disclosure Statement (**PDS**) for the Product before making a decision whether to buy the Product.

Target Market Summary

The Product is likely to be appropriate for a consumer seeking regular income to be used within a portfolio where the consumer has a short to medium investment timeframe, low to moderate risk/return profile and needs 90 day access to capital.

Product details

Issuer	Butler McIntyre Investments Ltd
Issuer ACN	091 407 046
Issuer AFSL	241380
Fund	Butler McIntyre Mortgage Fund
ARSN	094 635 720
Date TMD approved	8 September 2021

Description of Target Market

Consumer Attribute		Product Key Attribute
Investment objective:	<p>Capital Preservation <i>The consumer seeks to invest in a product to reduce volatility and minimise loss in a market down-turn. The consumer prefers defensive assets.</i></p> <p>Regular Income <i>The consumer seeks to invest in a product designed to generate regular investor income. The consumer prefers income-generating assets.</i></p>	<p>The Product seeks to provide consumers with regular returns by investing funds raised in loans secured by mortgages over real property situated in Tasmania. The Product is a pooled mortgage scheme which means consumers' funds are 'pooled' and invested collectively in loans.</p>
Intended product use:	Satellite/small allocation (< 25%)	<p>This Product is not appropriate as a standalone investment as it has minimal portfolio diversification. The Fund only invests in loans secured by mortgages over real property situated in Tasmania.</p> <p>This Product is suitable for a consumer who intends to hold the Product as a smaller part of their total portfolio as an indication it would be suitable for up to 25% of their total liquid funds to invest and the consumer is looking for a loan portfolio investment as part of their investment portfolio.</p>
Investment time frame:	<p>Short (less than 2 years)</p> <p>Medium (6 years or less)</p>	<p>The recommended investment time frame is at least 12 months with investors typically holding their investment in the Product for a longer medium term period.</p>
Risk and return profile:	Low to moderate	BMI seeks to protect the value of consumers' capital

	<p>while achieving sound investment returns. BMI has historically concentrated on moderate, sensible growth to avoid problems that may arise with rapid expansion. The Product is therefore low to moderate risk in nature.</p>
<p>Withdrawal needs: Quarterly</p>	<p>Consumers may, at any time, while the Product is liquid make an application to redeem all or part of their interest. Whilst the Product's constitution provides redemption requests must be processed by BMI within 90 days of receipt of the request, redemption requests may be processed earlier at the discretion of BMI and if the liquidity position of the Product allows this to occur. If the Product is at any time not liquid, then consumers will not be able to make redemption requests unless BMI makes a withdrawal offer to all consumers.</p>

Appropriateness

BMI 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.

Distribution conditions/restrictions

There are no distribution conditions. Potential investors approach BMI direct via non-BMI related word-of-mouth channels.

Review triggers

- Material change to key attributes, Product investment objective and/or fees.
- Material deviation from benchmark/objective over sustained period.

- Key attributes have not performed as disclosed by a material degree and for a material period.
- Determination by BMI of an ASIC reportable significant dealing.
- Material or unexpectedly high number of complaints (as defined in section 994A(1) of the Corporations Act) about the Product or distribution of the Product.
- The use of product intervention powers, regulator orders or directions that affects the Product.

BMI will review this TMD within 10 business days of the occurrence of any review trigger.

Mandatory review periods

Review period	Maximum period for review
Initial review	1 year and 3 months
Subsequent review	3 years and 3 months

Distributor reporting requirements

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Corporations Act) relating to the Product's design, 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 Corporations Act.	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 of dealings outside the target market these should be reported to BMI, 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

Record keeping

BMI will maintain records of the reasonable steps taken to ensure that this Product is sold in a manner consistent with this TMD.

BMI will also prepare and maintain complete and accurate records of its decisions, and the reasons for those decisions, in relation to:

- All target market determination for this Product;
- Identifying and tracking review triggers;
- Setting review periods; and
- The matters documented in this TMD.