

JBWere TARGET MARKET DETERMINATION

JBWere Investor Directed Portfolio Service (JBWere IDPS)

Determination Criteria	Description
Start Date:	16/11/2021
First and ongoing review period:	The first review, and each ongoing review, must be completed within each consecutive 12 month period from the Start Date.
Product:	JBWere Investor Directed Portfolio Service (JBWere IDPS)
Target Market	
Product description and key attributes:	<p>An investor directed portfolio service with the following key attributes through which a person may acquire a range of other financial products.</p> <ul style="list-style-type: none"> • The JBWere IDPS provides access to: <ul style="list-style-type: none"> – the JBWere Cash Account – custodial services – an investment platform alongside portfolio construction and asset allocation services that includes ongoing management of the portfolio – financial product advice and execution services on a transactional basis; and • Access to the JBWere IDPS is subject to the requirement to pay: <ul style="list-style-type: none"> – any applicable transaction and ongoing management fees – any applicable periodic advice fee – in order to acquire a particular financial product through the JBWere IDPS: <ul style="list-style-type: none"> ▪ money to settle a financial product transaction; and ▪ in respect of a product for which JBWere has prescribed a minimum investment amount, that amount.
Consumer needs and objectives:	<p>A person that may seek access to a range of investments which are centrally held through an investor director portfolio service or require access to the cash settlement facility which is made available through the JBWere IDPS.</p> <p>A person that may seek access to a range of investments held via investor directed portfolio service, including:</p> <ul style="list-style-type: none"> • cash • domestic equities • exchange-traded options • fixed income • managed funds • international securities.
Consumer financial situation:	<p>A person that will have access to sufficient funds to pay for:</p> <ul style="list-style-type: none"> • any applicable transaction and ongoing management fees • any applicable periodic advice fee; and • in order to acquire a particular financial product through the JBWere IDPS: <ul style="list-style-type: none"> – money to settle a financial product transaction; and – in respect of a product for which JBWere has prescribed a minimum investment amount, that amount.
Appropriateness statement:	JBWere has considered that the product including its key attributes is appropriate for the target market including the likely objectives, financial situation and needs of consumers in the target market.

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Distribution Conditions	
<p>Compliance: This condition applies to all conduct</p>	<p>Condition 1</p> <p>A distributor must:</p> <ul style="list-style-type: none"> • hold an appropriate Australian Financial Services Licence (AFSL) or be an authorised representative of a AFSL holder unless an exemption applies covering the provision of financial services in respect of the product; and • if the distributor is not JBWere: <ul style="list-style-type: none"> - comply with the terms and conditions of any relevant distribution agreement or arrangement with JBWere - if applicable, comply with the terms of any licensing exemption covering the provision of financial services in respect of the product. <p>A distributor must, in respect of the provision of personal financial product advice to retail clients:</p> <ul style="list-style-type: none"> • comply with the Code of Ethics; and • hold ASIC RG 146 accreditation with authority to provide financial product advice in respect of Tier 1 Products. <p>This condition is appropriate as it ensures distributors are appropriately compliant with regulatory requirements / industry codes to provide the relevant financial services.</p>
<p>General Advice including Marketing: This condition applies to general advice (including most marketing)</p>	<p>Condition 2</p> <p>A distributor may provide general advice (such as marketing) as to the product through limited public channels such as:</p> <ul style="list-style-type: none"> • advertising available on specialist periodicals related to investment (including relevant social media), brochures and other specialised marketing material • advertising through comparison sites and rating agencies • JBWere's Website; and • in person by a JBWere Adviser. <p>This condition is appropriate as the target market is relatively narrow as the product is specialised.</p> <p>It is acknowledged that these channels may be available to persons who may not at that time require an investor directed portfolio service. In those circumstances, the conditions set out in Distributions Conditions 1, 3 and 4 should assist in ensuring that those clients within the target market are likely to be issued the product.</p>
<p>Retail Product Distribution Conduct (other than General Advice): These conditions apply to all retail product distribution conduct that is not general advice</p>	<p>Condition 3</p> <p>A distributor must only engage in retail product distribution conduct (other than the provision of general advice) through:</p> <ul style="list-style-type: none"> • JBWere's Website; and • in person by a JBWere adviser. <p>This condition is appropriate as the target market for issue of this product is narrow, limited to those that understand the risks and benefits of investor director portfolio services. It is also appropriate as the issuer has distributed this product using this method, with considered risk to consumers.</p> <p>Condition 4</p> <p>A distributor must only engage in retail product distribution conduct (limited to dealing in the product) if the distributor reasonably considers that the consumer intends to holds the broader JBWere Multi-Asset Platform (of which the JBWere IDPS forms a part) and the distributor has informed the consumer of:</p>

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	<ul style="list-style-type: none"> the custodial nature of investments (which may include amendments to the voting rights ordinarily available) in respect of the investments and no access to the 14-day cooling-off period normally available to investors who invest in managed funds directly; and the risks applicable to the underlying accessible investments they may hold through the JBWere IDPS. <p>This condition is appropriate as it requires a distributor to confirm that the consumer is in the target market.</p>
Review Triggers	
Review triggers:	<p>JBWere and any Distributor of this product, must cease all retail product distribution conduct (except excluded conduct) in respect of this product within 10 business days of JBWere identifying a review trigger unless:</p> <ul style="list-style-type: none"> JBWere has determined that this Target Market Determination continues to be appropriate; or a new Target Market Determination has been made. <p>The events and circumstances described below will trigger a review of this Target Market Determination if JBWere determines it may relate to the appropriateness of the Target Market Determination having regard to JBWere's internal policies.</p> <p>JBWere will publish notice of a review on its website.</p>
Material complaints	<ul style="list-style-type: none"> Consumer complaints (in number or significance) within a three month period regarding understanding of risks, key terms, conditions or features of this product
Feedback from distributors	<ul style="list-style-type: none"> Reporting received from distributors, or consistent feedback from distributors which suggests that the target market may no longer be appropriate.
Substantial Product Change	<ul style="list-style-type: none"> JBWere makes a substantial change to the product terms, conditions or key attributes.
Product Performance	<ul style="list-style-type: none"> Evidence that customer usage is significantly different from original issuer expectations (e.g. a different product purpose) Evidence that product is no longer meeting the financial situation, needs and objectives of the target market for whom the product was designed Evidence of substantial sales outside of the Target Market.
Significant Change to the External Environment	<ul style="list-style-type: none"> Regulatory or legislative environment for this product. Economic and market conditions.
Notification from ASIC	JBWere receives a notification from ASIC requiring immediate cessation of product distribution, or particular conduct in relation to the product.
Significant Dealings	Evidence that product or distributor conduct are significantly different to the target market determination.
Reporting	
Reporting period:	<p>The reporting period for this determination is quarterly during each calendar year:</p> <ul style="list-style-type: none"> First reporting period ending on 31 March. Second reporting period ending on 30 June. Third reporting period ending on 30 September. Fourth reporting period ending on 31 December.

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Reporting information:	A distributor must provide the information in writing as soon as practicable, or within 10 business days after the reporting period.	
	Complaint Information	Complaints related to risks, key terms, conditions or features of this product including: <ul style="list-style-type: none">• the number of complaints• the nature and circumstances of the complaints• whether or not there has been or is likely to be consumer harm or detriment, and if so, the nature of the harm or detriment.
	Significant Dealings	If a distributor becomes aware of a significant dealing in the product or an issue with distributor conduct, that is not consistent with the target market determination, they must notify the issuer in writing as soon as practicable, and in any event within 10 business days after becoming aware.
	Other Information Requested by JBWere	Any other information requested in writing by JBWere from time to time subject to: <ul style="list-style-type: none">• The request being necessary to enable JBWere to meet its legal and compliance obligations; and• JBWere providing at least 30 days prior notice before the end of the Reporting Period.

This product is issued by JBWere Limited ABN 68 137 978 360, AFSL No. 341162 (JBWere). JBWere is a wholly owned subsidiary of National Australia Bank Limited ABN 12 004 044 937 AFSL and Australian Credit Licence 230686 (NAB). NAB does not guarantee the performance or obligations of JBWere or the products or services JBWere offers.