



# Antares Elite Opportunities Fund

## Target Market Determination

### Introduction

This Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth) (Corporations Act). This TMD describes the class of investors 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 available at [mlcam.com.au/TMD](http://mlcam.com.au/TMD). Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained by visiting our website at [antareshcapital.com.au/home/resource-library/fund-documents](http://antareshcapital.com.au/home/resource-library/fund-documents) or by contacting Client Services on **1300 738 355**.

### Target Market Summary

The Fund is designed for investors who:

- seek capital growth by investing in a Fund that aims to outperform the S&P/ASX 200 Total Return Index (after fees) over rolling five year periods;
- want a Fund that invests in an actively managed concentrated portfolio of equities listed (or expected to be listed) on the Australian share market;
- intend to use an investment in the Fund as a core or at least a satellite component of an investor's broader portfolio of investments (0-50%);
- accept that the risk and return profile of the Fund is very high;
- can tolerate fluctuations of income and the risk of capital loss;
- can invest for a minimum of 5 years; and
- are looking for an investment that processes withdrawals each business day.

### Fund and Issuer identifiers

Issuer	MLC Investments Limited (referred to as 'MLC', 'we', 'us' or 'our') ABN 30 002 641 661 AFSL 230705
Investment manager	Antares Capital Partners Ltd (Antares)
TMD contact details	<a href="mailto:ddoreporting_am@mlcam.com.au">ddoreporting_am@mlcam.com.au</a>
Fund name	Antares Elite Opportunities Fund (Fund) ARSN 102 675 641 APIR PPL0115AU
TMD issue date	19 December 2024
TMD Version	4
Distribution status of Fund	Available

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### Description of Target Market

#### Table Instructions

In the table below:

- Column 1, Investor Attributes, indicates a description of the likely objectives, financial situation and needs of the class of investors that are considering this product.
- Column 2, TMD indicator, indicates whether an investor meeting the attribute in column 1 is likely to be in the target market for this product.
- Column 3, Product description including key attributes, outlines features of the product which are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

#### TMD indicator key

The investor attributes for which the product is likely to be appropriate have been assessed using a green and red rating methodology:

In target market

Not in target market

#### Investor attribute definitions

Investors should refer to the 'TMD definitions' available at [mlcam.com.au/TMD](http://mlcam.com.au/TMD) for the definitions of the investor attributes (that is, the terms used in the 'Investor attributes' column in the table below).

#### 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 investors in the target market as described below. The attributes of the product in the 'Product description including key attributes' column of the table below are consistent with the corresponding investor attributes identified with a green rating in the 'TMD indicator' column.

#### Investment products and diversification

An investor (or class of investor) 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 investor's attributes for the relevant portion of the portfolio, rather than the investor's portfolio as a whole. For example, an investor 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 investor's objectives for that *minor allocation* notwithstanding that the risk/return profile of the investor as a whole is *medium*. In making this assessment, distributors should consider all features of a product (including its key attributes). Please note that an 'Investor's intended product use', which sets out the percentage of Investable Assets, is defined as based on all of the assets that the investor has available for investment (excluding the residential home). It is not intended to be limited to only, for example, the relevant portion of assets the investor is currently intending to invest.

Investor Attributes	TMD indicator	Product description including key attributes
<b>Investor's investment objective</b>		
Capital Growth	In target market	The Fund is an actively managed concentrated portfolio of equities listed (or expected to be listed) on the Australian share market.
Capital Preservation	Not in target market	The Fund's primary objective is to outperform the S&P/ASX 200 Total Return Index (after fees) over rolling five year periods.
Income Distribution	Not in target market	The Fund is a concentrated portfolio of Australian listed equities containing only Antares' highest conviction investment ideas. The Fund isn't constrained by the Benchmark's industry or company weights, giving Antares the flexibility to invest in their best investment ideas. Investment approach Antares follows a bottom-up investment process, which means investment decisions are made by undertaking in-depth proprietary research and analysis of individual companies and equities.  In general, Antares aims to invest in companies where the current share price does not fully reflect its view of the potential value of each company's business. Through company contact and detailed financial and non-financial analysis, Antares' research analysts seek to gain a thorough understanding of Australian companies and the industries in which they operate.
<b>Investor's intended product use (% of Investable Assets)</b>		
Solution/Standalone (up to 100%)	Not in target market	The Fund has medium portfolio diversification. The asset allocation ranges of the Fund are:
Major allocation (up to 75%)	Not in target market	<ul style="list-style-type: none"> <li>Australian equities: 95 - 100%</li> <li>Cash and cash equivalents: 0 - 5%</li> </ul>
Core component (up to 50%)	In target market	
Minor allocation (up to 25%)	In target market	Diversification is achieved by providing exposure to a variety of investments within the asset classes.
Satellite allocation (up to 10%)	In target market	
<b>Investor's investment timeframe</b>		
Minimum investment timeframe	5 years	The Fund is designed for investors who are looking to make a medium to long-term investment, with at least a 5 year timeframe.

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Investor's Risk (ability to bear loss) and Return profile for the relevant portion of the investor's portfolio		
Low	Not in target market	The risk and return profile is 'very high'.
Medium	Not in target market	The Fund is likely to be suitable for clients who, in respect of the relevant portion of their portfolio:
High	Not in target market	<ul style="list-style-type: none"> <li>• have a very high tolerance of the risks associated with investing;</li> <li>• can sustain the potential losses arising from a very high risk product (e.g. has the ability to bear 6 or more negative returns over a 20 year period); and</li> <li>• seek a very high potential level of return that is offered by the Fund.</li> </ul>
Very high	In target market	
Extremely high	Not in target market	<p>The Fund generally uses derivatives for the purpose of cash management and to minimise investment risk. The Fund can invest in a range of derivatives, typically exchange traded options or Share Price Index (SPI) contracts. These are futures contracts that provide exposure to Australia's top 200 companies without having to buy or sell shares in every company in the Index. Derivatives will not be used within the Fund for gearing purposes.</p> <p>For more information, refer to the PDS.</p>

Investor's need to access capital		
Within one week of request	In target market	Direct investors can generally request to redeem all or part of their investment in the Fund by 3:00pm (Melbourne time) on a Business Day. Redemption proceeds will generally be paid within 3 Business Days after we accept the redemption request. If there are abnormal circumstances such as a suspension of redemptions or where we believe that it is not in the best interests of investors, withdrawals may be delayed. For further information, refer to the PDS.
Within one month of request	In target market	
Within three months of request	In target market	
Within one year of request	In target market	Investing via an IDPS or master trust may result in different timeframes for payments of redemption requests compared to direct investors. Investors should contact their financial adviser or IDPS operator for further information.
Within 5 years of request	In target market	
Within 10 years of request	In target market	
10 years or more	In target market	

### Distribution conditions/restrictions

Channel	Distribution conditions	Distribution condition rationale
Direct (non-advised)	<p>By application to us, provided the amount to be invested (and maintained) is at least \$20,000. We may accept lower amounts at our discretion.</p> <p>The investor will acquire the product directly via the Issuer's website, <a href="http://antareshcapital.com.au">antareshcapital.com.au</a>, by completing the Initial Application Form in accordance with the PDS. The investor completing the Initial Application Form will be asked a series of questions to assist the Issuer in understanding whether the investor is within the target market.</p>	It has been determined that the distribution conditions and restrictions will make it likely that investors who acquire the product are in the class of investors for which it has been designed. We consider that the distribution conditions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.
Advisers	<p>This product may be distributed to investors by a Licensee or its Authorised Representative (as defined in the Act) (known as a financial adviser) who provides personal advice. The Initial Application Form includes a series of questions to assist the Issuer in understanding whether the investor is within the target market.</p> <p>Financial advisers have their own legal obligations that must be satisfied in the provision of personal advice.</p>	<p>The Issuer considers the distribution condition will make it likely that investors who acquire the product will be in target market for the product, or the product will otherwise be appropriate for them because the financial adviser providing personal advice must:</p> <ul style="list-style-type: none"> <li>• take into account the investor's personal objectives, financial situation and needs, and</li> <li>• comply with the best interests duty and related obligations under Pt 7.7A of the Act.</li> </ul>

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Platform providers	This product is available to persons investing through investment or super platforms, wrap products, IDPS, IDPS-like schemes, a nominee or custody service or any other trading platform (platform) as authorised by the Responsible Entity.	<p>The Issuer considers the distribution condition will make it more likely that the consumers who acquire the product are in the target market because the platform provider has an arrangement with the Issuer governing their relationship with the Issuer noting that platform providers, as distributors, are required to take reasonable steps that will, or are likely to, result in distribution of the product being consistent with the TMD. The Issuer seeks confirmation twice a year from platform providers confirming that they have taken reasonable steps to ensure distribution is consistent with the TMD.</p> <p>In addition, 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 product distribution conduct being consistent with the TMD. Reasonable steps includes undertaking due diligence of platform providers, methods of distribution and controls.</p>
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Review triggers

The parameters for each review trigger listed below are set by the Issuer and may vary from time to time. The Product is assessed against these parameters on a quarterly basis. Please note, in some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Material change to key attributes, Fund investment objective and/or fees. For example, changes to the Fund profile within the PDS.
Material deviation from benchmark/objective over sustained period. For example, the Fund's performance has not met the Issuer's threshold over a period specific to the Fund.
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 affect the product.
Regulatory or legislative changes which govern the Fund such as changes to tax legislation.
Significant breach of financial services law where the breach relates to the design or distribution of the Fund.

Mandatory TMD review periods

Review period	Maximum period for review
Initial review	Within 18 months after the issue date. (Complete)
Subsequent review	After initial review, within every 27 months. (March 2027)

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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 design, product availability and distribution of the Fund. The distributor should provide all the content of the complaint, having regard to privacy.	As soon as practicable but no later than 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 at <a href="http://mlcam.com.au/TMD">mlcam.com.au/TMD</a> for further detail.	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	All distributors
Other information requested by us	Other information reasonably requested by us to meet our legal obligations, with appropriate notice given to the Distributor such as: <ul style="list-style-type: none"> <li>a summary of the steps taken to ensure the Distributor's conduct is consistent with this TMD (as required under section 994E(3) of the Corporations Act); and</li> <li>feedback on investor experience with the Fund which suggests that the TMD may no longer be appropriate.</li> </ul>	All distributors

Distributors must report to the Issuer using the method specified at [mlcam.com.au/ddoreporting](http://mlcam.com.au/ddoreporting)

This TMD is issued by MLC Investments Limited (MLC) ABN 30 002 641 661 AFSL 230705 as responsible entity for the Fund and is part of the group of companies comprising Insignia Financial Ltd ABN 49 100 103 722 and its related bodies corporate (IFL Group).

MLC is the issuer of units in the Fund or product defined in this TMD. The information in this TMD is general information only and not intended to provide financial advice or take into account an individual's objectives, situation or needs. The TMD may, therefore, not be applicable to an individual's situation. Before making an investment decision, investors should consider with a financial adviser their circumstances, the PDS and whether the TMD is suitable to their situation. Investors can access the PDS at [antarescapital.com.au/home/resource-library/fund-documents](http://antarescapital.com.au/home/resource-library/fund-documents) or by contacting Client Services on 1300 738 355.

Past performance is not a reliable indicator of future performance. The value of an investment may rise or fall with the changes in the market.

To the extent permitted by law, no liability is accepted by any member of the IFL Group for any loss or damage as a result of any reliance on this information.