

Target Market Determination

VanEck Benthams Global Capital Securities Active ETF (Managed Fund) (ASX Code: GCAP)

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 VanEck Investments Limited's (VanEck) 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) for the VanEck Benthams Global Capital Securities Active ETF (Managed Fund) (GCAP) 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 at www.vanek.com.au/regulatory-documents.

Target Market Summary

This product is likely to be appropriate for a consumer seeking income distributions to be used as a satellite component within a portfolio where the consumer has a medium or long investment timeframe, high or very high risk/return profile and needs daily access to capital.

GCAP is an exchange traded product and is generally only available to consumers through the ASX.

Fund and Issuer Identifiers

Issuer	VanEck Investments Limited	ISIN Code	AU0000163230
Issuer ABN	22 146 596 116	Market Identifier Code	XASX
Issuer AFSL	416 755	Product Exchange code	GCAP
Fund	VanEck Benthams Global Capital Securities Active ETF (Managed Fund)	Date TMD approved	8 September 2022
ARSN	649 884 631	TMD Version	2
APIR Code	Not applicable	TMD Status	Current

Description of Target Market

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, 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.

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		GCAP's investment objective is to earn an after fee return in excess of the RBA cash rate + 3% per annum (Benchmark) over the long term. GCAP invests predominantly in global Capital Securities which include a range of different subordinated debt securities similar to 'hybrids' (i.e. securities which combine both 'equity like' and 'debt like' characteristics).
Capital Preservation		
Capital Guaranteed		As GCAP is an actively managed strategy that seeks to provide an investment return above the current inflation rate,
Income Distribution		GCAP is likely to be appropriate for consumers who are seeking capital growth. Further, as GCAP generally pays dividends on a monthly basis and invests predominantly in global Capital Securities, by virtue of the nature of these assets being 'hybrid' securities, it is also likely to be appropriate for consumers who are seeking income distribution
Consumer's intended product use (% of Investable Assets)		
Solution/Standalone (75-100%)		As GCAP is an actively managed strategy investing predominantly in global Capital Securities, the portfolio diversification of GCAP is low. Therefore GCAP is likely to be appropriate as a core or satellite component of a consumer's portfolio.
Core Component (25-75%)		
Satellite/small allocation (<25%)		
Consumer's investment timeframe		
Short (≤ 2 years)		GCAP is likely to be appropriate for consumers who are comfortable with short and medium term fluctuations in capital value either because they have an investment timeframe of at least five years or because they are seeking a shorter-term tactical exposure to those fluctuations.
Medium (> 2 years)		
Long (> 8 years)		
Consumer's Risk (ability to bear loss) and Return profile		
Low		GCAP's investment objective is to earn an after fee return in excess of the Benchmark over the long term. Due to the nature of GCAP's investment strategy, the level of investment risk is considered high to very high. GCAP targets a higher return profile and has a potential for higher losses. Therefore GCAP is likely to be appropriate for consumers who are higher risk in nature, can accept higher potential losses in order to target a higher return or have a more aggressive or very high risk appetite, can accept higher potential losses and seek to maximise returns.
Medium		
High		
Very High		
Consumer's need to withdraw money		
Daily		Under ordinary circumstances consumers can buy and sell units in GCAP on ASX on any day that ASX is open. GCAP is therefore likely to be appropriate for consumers who need the ability to withdraw their money on any given business day.
Weekly		
Monthly		
Quarterly		
Annually or longer		

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 described above, as the features of this product in Column 3 of the table above are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Distribution Conditions/Restrictions

Distribution Condition	Distribution Condition Rationale
There are no distribution conditions.	Not applicable.

Review triggers

Material change to key attributes, fund investment objective and/or fees.
Material deviation from investment 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 orders or directions that affects the product.

Mandatory review periods

Review period	Maximum period for review
Initial review	One year
Subsequent review	Three years

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.	Within 10 business days following end of calendar quarter.	All distributors

Reports are to be emailed to ddo@vaneck.com.au.

Definitions

Term	Definition
Consumer's investment objective	
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).
Consumer's intended product use (% of Investable Assets)	
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.
Portfolio diversification (for completing the key product attribute section of consumer's intended product use)	
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".
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).
Consumer's intended investment timeframe	
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.

Term	Definition
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Consumer's Risk (ability to bear loss) and Return profile

Issuers should undertake a comprehensive risk assessment for each product. The FSC recommends adoption of the Standard Risk Measure (SRM) to calculate the likely number of negative annual returns over a 20 year period, using the guidance and methodology outlined in the *Standard Risk Measure Guidance Paper For Trustees*. 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.

A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.

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>
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>

Consumer's need to withdraw money

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.

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>
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Term	Definition
Distributor Reporting	
Significant dealings	<p data-bbox="464 271 1444 394">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 data-bbox="464 409 1422 501">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 data-bbox="464 517 1054 546">Dealings outside this TMD may be significant because:</p> <ul data-bbox="464 562 1430 689" style="list-style-type: none"> <li data-bbox="464 562 1430 618">• they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or <li data-bbox="464 629 1430 689">• 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 data-bbox="464 707 1018 736">In each case, the distributor should have regard to:</p> <ul data-bbox="464 752 1441 956" style="list-style-type: none"> <li data-bbox="464 752 1441 813">• the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes), <li data-bbox="464 824 1441 884">• 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 data-bbox="464 896 1441 956">• 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). <p data-bbox="464 974 1444 1034">Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if:</p> <ul data-bbox="464 1050 1366 1227" style="list-style-type: none"> <li data-bbox="464 1050 1366 1111">• it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the reporting period, <li data-bbox="464 1122 1187 1151">• the consumer's intended product use is <i>Solution / Standalone</i>, or <li data-bbox="464 1162 1366 1227">• the consumer's intended product use is <i>Core component</i> and the consumer's risk (ability to bear loss) and return profile is <i>Low</i>.

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Important Information

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