

# Target Market Determination

## KAPSTREAM INVESTMENT TRUST

### 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 (being units (**Units**) in the Kapstream Investment Trust (**Fund**)) 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 at the end of this document. Capitalised terms have the meaning given to them in the product's current PDS, unless otherwise defined. The PDS can be obtained by accessing [www.asx.com.au](http://www.asx.com.au), or [www.kapstream.com.au/asxkit](http://www.kapstream.com.au/asxkit).

Target Market Summary	This product is intended for use as a Satellite Allocation for a consumer who is seeking Income Distribution and has a 'Medium' to 'Very high' risk and return profile for that portion of their investment portfolio. Although the aim of the Fund is to distribute income, this is a target only and may not be achieved. This product is likely to be consistent with the financial situation and needs of a consumer with at least a 3 year investment timeframe but who wants the flexibility to potentially access their capital within this period by selling the Units in the Fund on the ASX (subject to an active trading market developing) or through any limited buy-back offer made by the Issuer.
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### FUND AND ISSUER IDENTIFIERS

Issuer	Equity Trustees Limited	ISIN Code	
Issuer ABN	46 004 031 298	Market Identifier Code	ASX
Issuer AFSL	240975	Product Exchange code	KIT
Fund manager	Kapstream Capital Pty Ltd and Mantis Funds Pty Ltd	TMD issue date	16.02.2026
TMD contact details	<a href="mailto:DDOCCompliance@eqt.com.au">DDOCCompliance@eqt.com.au</a>	TMD Version	1
Fund name	Kapstream Investment Trust	Distribution status of Fund	Available / Current until the end of the Offer Period as specified in the product's current PDS.
ARSN	691 029 124		
APIR Code			

### 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**

**Not 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.

#### 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](#). This guidance only applies where a product is held as part of a diversified portfolio.



Consumer Attributes	TMD Indicator	Product description including key attributes
<b>Consumer's investment objective</b>		
Capital Growth	Not in target market	Investors should note: <ul style="list-style-type: none"> <li>the Units in the Fund include terms and features as described in the PDS;</li> <li>the Fund's investment objective is to meet the target return of RBA Cash Rate +3.50% p.a. (pre-tax, net of management fees and costs). This is a target only and may not be achieved;</li> <li>payment of income is not guaranteed as the Issuer's ability to pay a distribution is contingent on the income the Fund receives from investments; and</li> <li>the Units are not designed to provide capital growth.</li> </ul>
Capital Preservation	Not in target market	
Income Distribution	In target market	
<b>Consumer's intended product use (% of Investable Assets)</b>		
Solution/Standalone (up to 100%)	Not in target market	The Fund invests predominantly in a diversified portfolio of Investment Grade Australian and global Fixed Income Securities as well as Australian private Asset Backed Securities typically in the form of Warehouse Financing. The Fund may also hold Cash on a temporary or limited basis.
Major Allocation (up to 75%)	Not in target market	
Core Component (up to 50%)	Not in target market	
Minor Allocation (up to 25%)	Not in target market	
Satellite Allocation (up to 10%)	In target market	The Issuer considers the Units suitable for a satellite allocation as the Units are considered to have an overall low diversification given the focus on a narrow asset class ie debt and credit investments.
<b>Consumer's investment timeframe</b>		
Minimum investment timeframe	3 years	The minimum suggested timeframe for holding investments in the Fund is 3 years.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>		
Low	Not in target market	The Fund is suitable for investors who have a ' <i>medium</i> ' to ' <i>very high</i> ' risk and return profile. The target return is not guaranteed and is subject to market conditions, conflict of interest risk, liquidity risk, private debt asset risk (including credit and default risk, and interest rate risk), leverage risk, and other risks disclosed in the PDS at section 12 that may result in a reduction in the value of the investment. Investors in the Fund should be willing to accept that:
Medium	In target market	
High	In target market	
Very high	In target market	
Extremely high	Not in target market	
<b>Consumer's need to access capital</b>		
Within one week of request	In target market	The product may be sold on the ASX and sale proceeds are usually settled by the transacting broker two business days after the sale. Although liquidity is generally expected to exist in this secondary market, there are no guarantees that an active trading market with sufficient liquidity will develop, or that such a secondary market will sustain a price representative of the net asset value of the Fund.
Within one month of request	In target market	
Within three months of request	In target market	
Within one year of request	In target market	
Within 5 years of request	In target market	
Within 10 years of request	In target market	
10 years or more	In target market	
At issuer discretion	Not in target market	N/A

## Distribution conditions/ restrictions for retail product distribution conduct

Distribution conditions	Distribution condition rationale
<b>Authorisation and appointment of distributors</b>	
<b>Condition 1</b> A distributor must: <ul style="list-style-type: none"> <li>hold an appropriate Australian Financial Services Licence ("AFSL") or be an authorised representative of a AFSL holder unless an AFSL exemption applies covering the provision of financial services in respect of Units in the Fund;</li> <li>comply with the terms and conditions of any relevant distribution agreement or arrangement with the Issuer; and</li> <li>if applicable, comply with the terms of any AFSL exemption covering the provision of financial services in respect of Units in the Fund.</li> </ul>	This condition is appropriate as it requires distributors to have the requisite licence to provide the relevant regulated financial services and requires distributors to comply with the commercial terms agreed between the distributor and the Issuer.
<b>Condition 2</b> A distributor must only engage in retail product distribution conduct in respect of Units in the Fund if: <ul style="list-style-type: none"> <li>a TMD has been made and published for the product and has not been withdrawn;</li> <li>the distributor complies with the terms of the TMD for the product;</li> <li>ASIC has not issued a product intervention order restricting the distribution of the product for the distributor; and</li> <li>the distributor complies with Conditions 3 and 4 below.</li> </ul>	This condition is appropriate as it requires distributors only to engage in retail product distribution conduct in accordance with a TMD that has been made by the Issuer and has not been withdrawn.
<b>Distribution via Brokers</b>	
<b>Condition 3</b> Units in the Fund can only be issued pursuant to applications submitted through a "Broker", being a Joint Lead Arranger ("JLAs") or Joint Lead Manager ("JLMs") as described in the PDS, together with affiliated retail brokers of the JLAs and JLMs and any other brokers appointed by the JLAs and JLMs following consultation with the Issuer.	This condition is appropriate because: <ul style="list-style-type: none"> <li>if the Issuer only issues Units in the Fund to retail investors who have submitted their applications through the Brokers, it is more likely that Units will be distributed to such investors within the target market as the Broker has its own obligation to take reasonable steps that will or are reasonably likely to result in retail product distribution conduct being consistent with this TMD; and</li> <li>if Units are issued in accordance with personal financial product advice received by a retail investor, the third party's standard advice documentation process (i.e. the provision of a statement of advice to the consumer) will be followed.</li> </ul>
<b>Condition 4</b> Brokers are engaged having regard to their credentials and standing in the market for securities of this kind and are subject to contractual requirements to take reasonable steps to distribute Units in the Fund to retail clients in compliance with this TMD.	This condition is appropriate because it ensures that: <ul style="list-style-type: none"> <li>checks are conducted on matters like credentials and good standing for persons involved in the distribution of Units in the Fund; and</li> <li>distributors are subject to contractual obligations which will make it likely that Units in the Fund are only distributed to investors who are retail clients if those investors are in the target market because each distributor is subject to obligations as a distributor to take reasonable steps that will, or are reasonably likely to, result in retail product distribution conduct being consistent with this TMD.</li> </ul>
<b>Condition 5</b> Units in the Fund can only be issued to retail investors as defined in Part 7.1 of the <i>Corporations Act 2001</i> (Cth) where the distributor is reasonably satisfied that the investor has obtained personal advice which is consistent with distribution of the Units to the investor.	This condition is appropriate because it ensures that: <ul style="list-style-type: none"> <li>if the Issuer only issues Units in the Fund to retail investors who have obtained personal advice, it is more likely that Units will be distributed to retail investors within the target market because persons providing personal financial product advice to acquire Units must consider the consumer's individual circumstances and comply with the best interests duty and related obligations under Pt 7.7A of the <i>Corporations Act 2001</i> (Cth).</li> </ul>

## Review triggers

Determination by the Issuer of an ASIC reportable Significant Dealing.

Material or unexpectedly high number of complaints (as defined in section 994A(2) of the Act) about the product or distribution of the product.

Significant change to the legal and/or regulatory environment which materially affects the product.

Any significant feedback received from a regulator or distributor, or consistent feedback from distributors or regulators, which reasonably suggests to the Issuer that the target market or product attributes are not appropriate.

The use of Product Intervention Powers, regulatory orders or directions that affects the product.

There is a material change to the product's key attributes that make it no longer consistent with the likely objectives, financial situation and needs of customers in the target market.

## Mandatory TMD review periods

Review Period	Maximum period for review
Initial review	N/A
Subsequent review	N/A

## Distributor reporting requirements

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(2) 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 no later than 10 business days following the end of the Offer Period as specified in the product's current PDS.	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 no later than 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 the Issuer using the method specified on this website: [www.egt.com.au/DDOreporting](http://www.egt.com.au/DDOreporting). Distributors must report to the Issuer by contacting [DDOCompliance@egt.com.au](mailto:DDOCompliance@egt.com.au).

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# Definitions

Term	Definition
<b>Consumer's investment objective</b>	
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).
<b>Consumer's intended product use (% of Investable Assets)</b>	
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.
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 and money needed for daily living expenses such as bills and mortgage repayments.
<b>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.</b>	
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).

Term	Definition
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.
<b>Consumer's intended investment timeframe</b>	
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.
<b>Consumer's Risk (ability to bear loss) and Return profile</b>	
<p>This TMD may use the Standard Risk Measure (SRM) as an input to the assessment of the risk and return profile of the product, but may not necessarily be the only input used. The SRM estimates the likely number of negative annual returns for a product over a 20 year period. The SRM may be supplemented by other risk factors, such as the potential size of a negative or positive return, liquidity or withdrawal limitations, underlying investments with valuation risks or risks of capital loss, the use of leverage or short selling, or otherwise may have complex structures.</p> <p>A consumer's desired product return profile will 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"> <li>• has a conservative or low risk appetite,</li> <li>• 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</li> <li>• is comfortable with a low target return profile.</li> </ul> <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"> <li>• has a moderate or medium risk appetite,</li> <li>• 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</li> <li>• is comfortable with a moderate target return profile.</li> </ul> <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"> <li>• has a high risk appetite,</li> <li>• 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</li> <li>• seeks high returns (typically over a medium or long timeframe).</li> </ul> <p>The consumer typically prefers growth assets (for example, shares and property).</p>
Very high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has a very high risk appetite,</li> <li>• 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</li> <li>• seeks very high returns (typically over a medium or long timeframe).</li> </ul> <p>The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).</p>

Term	Definition
Extremely high	<p>For the relevant part of the consumer's portfolio, the consumer:</p> <ul style="list-style-type: none"> <li>• has an extremely high risk appetite,</li> <li>• can accept extremely high volatility and potential losses (eg. has the ability to bear more than 7 negative returns over a 20 year period), and</li> <li>• seeks to maximise returns (potentially in a short timeframe).</li> </ul> <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>
<b>Consumer's need to access capital</b>	
<p>This consumer attribute addresses the likely period of time between the making of a request for 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 and likely realisable value on market should be considered, including in times of market stress.</p>	
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"> <li>• they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or</li> <li>• 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).</li> </ul> <p>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> <li>• the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes),</li> <li>• 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> <li>• 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).</li> </ul> <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"> <li>• it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the quarter,</li> <li>• the consumer's intended product use is <i>solution/standalone</i>,</li> <li>• the consumer's intended product use is core component or higher and the consumer's risk/return profile is <i>low</i>, or</li> <li>• the relevant product has a green rating for consumers seeking <i>extremely high</i> risk/return.</li> </ul>