

360 Capital Mortgage REIT – Target Market Determination

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This Target Market Determination (TMD) is issued by 360 Capital FM Limited ABN 15 090 664 396 AFSL 221 474 (Issuer). The Issuer is the responsible entity and issuer of units in the managed investment scheme referred to in this TMD. The TMD provides general information only and does not take into account an investors individual objective, financial situation, needs or circumstances. This material is not a financial product recommendation or an offer or solicitation with respect to the purchase or sale of any financial product in any jurisdiction.



360 Capital Mortgage REIT – Target Market Determination

Legal disclaimer

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (the **Act**) and is issued by 360 Capital FM Limited ABN 15 090 664 396 AFSL 221 474 (**'Issuer'**, **'our'** or **'us'**) as responsible entity of the 360 Capital Mortgage REIT ARSN 115 632 990 (**Fund**). 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 360 Capital FM Limited'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 this product should carefully read the Product Disclosure Statement (**PDS**) for 360 Capital Mortgage REIT (**Fund**) 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.

Target Market Summary

This product is likely to be appropriate for a consumer that: (1) seeks income distributions as a greater priority with little or no expectation of capital growth; (2) wishes to have ready access to their capital whether in the short, medium or longer term through the ability to sell their interests in the product on the Australian Securities Exchange assuming normal market conditions; (3) Wishes capital to be preserved in circumstances where there is expected to be low trading volatility but does not require a capital guarantee; (4) Has the ability to bear some losses consistent with a medium risk/return profile; (5) Will use the product as a satellite/small allocation of their portfolio.



Fund and Issuer identifiers

Issuer	360 Capital FM Limited
Issuer ABN	15 090 664 396
Issuer AFSL	221474
Fund	360 Capital Mortgage REIT
ARSN	115 632 990
Market Identifier Code	ASX: TCF
Date TMD approved	22 October 2021
TMD Version	2
TMD Status	Current

Distribution conditions/restrictions

This part is required under section 994B(5)(c) of the Act.

Distribution Condition	Distribution Condition Rationale	Applicable
There are no distribution conditions.	Not applicable.	Y
Only suitable for distribution to consumers who have received personal advice	-	N
Only suitable for distribution through specified distributor/s/distribution channel (if any)	-	N
Other	-	N



Description of Target Market

This part is required under section 994B(5)(b) of the Act.

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
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Instructions

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.

Definitions and guidance around important terms used in this TMD can be found in the Definitions section of this document.

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

Consumer Attributes	TMD Indicator	Product description including key attributes
Consumer's investment objective		
Capital Growth	Not in target market	<p>The Fund's Investment Objective is to achieve a Target Return of RBA Cash Rate + 4% p.a. (net of fees and costs) (Target Return), provide monthly cash income, capital preservation and portfolio diversification. The Fund seeks to achieve these objectives by investing in a portfolio of private credit opportunities with exposure to commercial real estate loans.</p> <p>Your investment objectives are to invest in a Fund that: focuses on providing regular income at a monthly frequency, aims for, but does not guarantee, capital preservation, aims to achieve the Target Return and is likely to have lower short-term fluctuations in values in average market conditions and therefore a lower chance of capital loss. Capital growth is extremely unlikely.</p>
Capital Preservation	In target market	
Income Distribution	In target market	
Consumer's intended product use (% of Investable Assets)		
Solution/Standalone (75-100%)	Not in target market	<p>The Fund provides monthly distribution income to investors and aims at capital preservation and portfolio diversification. The product is suited to form part of an investment portfolio. This investment may be held as part of a more diversified portfolio, where it is not the sole or a significant proportion of investments held (unless held in this manner for a short time while building a more diversified portfolio). The investment may be held as a core component where a portfolio is weighted towards income investments with low diversification.</p>
Core Component (25-75%)	Potentially in target market	
Satellite/small allocation (<25%)	In target market	
Consumer's investment timeframe		
Short (\leq 2 years)	In target market	<p>The Fund is suitable for all investment timeframes (short, medium and long) depending on the investor's preference as its investment objectives is to provide monthly income (Target Return of RBA Cash Rate + 4% p.a. (net of fees and costs)), capital preservation and portfolio diversification.</p>
Medium (> 2 years)		
Long (> 8 years)		



Consumer Attributes	TMD Indicator	Product description including key attributes
Consumer's Risk (ability to bear loss) and Return profile		
Low	Potentially in target market	<p>The Fund is listed and units in the Fund are quoted on the ASX and the price of units in the Fund may change and investors should expect that for periods of time, the units may trade below its stated underlying Net Asset Value (“NAV”) per unit.</p> <p>In respect of the Fund net assets, the Fund invests in private credit loan instruments (direct or indirectly) through the following strategies:</p> <ul style="list-style-type: none"> - senior secured loans which has a low risk profile; - subordinated and mezzanine loans which has a low – medium risk profile; and - enhanced return strategy which has a medium risk profile but will generate higher yields. <p>Each borrower under a loan instrument will be required to provide collateral (security) to support the loan. Collateral for loan obligations is provided in various forms and can include real property, other physical assets, company charge, shares of a company and guarantees.</p>
Medium	In target market	
High	Not in target market	<p>Investors in this product have an ability to bear capital losses. The price at which investors may sell this investment is subject to stock market fluctuations so the investment is designed for investors who can bear a decline in market value in one or more years.</p>
Very High	Not in target market	
Consumer's need to withdraw money		
Daily	In target market	



Consumer Attributes	TMD Indicator	Product description including key attributes
Weekly		Units in the Fund are quoted on the ASX. Withdrawals can only be achieved via selling units on the ASX. As the Fund is a listed investment trust, there is no regular redemption facility for units (if a unitholder no longer wishes to be invested in the Fund with respect to some or all of their units, they will not have the ability to redeem their units). 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, that such a secondary market will sustain a price representative of the NAV per Unit.
Monthly		
Quarterly		
Annually or longer		



Appropriateness

Note: This section is required under RG 274.64–66.

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.

Review Processes

This part is required under section 994B(5)(d) of the Act.

Review triggers
Material change to key attributes, fund 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 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	Approximately 1 year and 3 months from date of TMD
Subsequent review	Approximately every 3 years thereafter



Distributor Reporting

This part is required under section 994B(5)(g) and (h) of the Act.

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. 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 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
To the extent a distributor is aware, dealings outside the target market, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	Within 10 business days of the end of the calendar reporting period.	All distributors

If practicable, distributors should adopt the FSC data standards for reports and provide them via email to the Issuer at DDO@360capital.com.au



Disclaimer

This TMD has been prepared by 360 Capital FM Limited (ACN 090 664 396) (**Issuer**) as responsible entity for 360 Capital Mortgage REIT (ARSN 115 632 990) (the **Fund**). This material is a summary and does not purport to be complete. It is not intended to be relied upon as advice to investors or potential investors and does not take into account the investment objectives, financial situation or needs of any particular investor. A reader should, before making any decisions in relation to their investment or potential investment in the Fund, seek their own professional advice. This document is not an offer or invitation for subscription or purchase of securities or other financial products. The Issuer and its related bodies corporate and other affiliates and their respective directors, employees, consultants and agents make no representation or warranty as to the accuracy, completeness, timeliness or reliability of the contents of this presentation. To the maximum extent permitted by law, no member of the Issuer accepts any liability (including, without limitation, any liability arising from fault or negligence on the part of any of them) for any loss whatsoever arising from the use of this presentation or its contents or otherwise arising in connection with it. Indications of, and guidance on, future earnings and financial position and performance are “forward-looking statements”. Forward-looking statements are not guarantees of future performance and involve known and unknown risks, uncertainties and other factors, many of which are beyond the control of the Issuer, that may cause actual results to differ materially from those expressed or implied in such statements. There can be no assurance that actual outcomes will not differ materially from these statements. Except as required by law, the Issuer does not undertake any obligation to publicly update or review any forward – looking statements, whether as a result of new information or future events. This information has been made available to the recipient for information purposes only. It is not intended to be, and does not constitute a product disclosure statement, prospectus, short form prospectus or profile statement as those terms are defined in the Corporations Act 2001 (Cth). It does not constitute an offer for the issue, sale or purchase of any securities, or any recommendation in relation to investing in any asset.

This TMD is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.



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.

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Term	Definition
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 (≤ 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.
Consumer's Risk (ability to bear loss) and Return profile	
<p>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 <i>Standard Risk Measure Guidance Paper For Trustees</i>. 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.</p>	
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>



Term	Definition
	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.
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	
<p>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.</p>	
Daily/Weekly/Monthly/Quarterly/Annually or longer	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.
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"> • they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or • 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>In each case, the distributor should have regard to:</p> <ul style="list-style-type: none"> • the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes),



Term	Definition
	<ul style="list-style-type: none"> • 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 • 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>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"> • it constitutes more than half of the distributor’s total retail product distribution conduct in relation to the product over the reporting period, • the consumer’s intended product use is <i>Solution / Standalone</i>, or • 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>.