

Sunsuper for life Corporate Sunsuper for life Business Super-savings account

Target Market Determination

1. About this document

This *Target Market Determination (TMD)* seeks to provide consumers, Sunsuper staff and distributors with an understanding of the class of consumers for which this product has been designed (the target market), having regard to their likely objectives, financial situation and needs.

This document is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. Consumers must refer to the relevant *Product Disclosure Statement (PDS)* and any supplementary documents for the *Sunsuper for life Corporate* or *Sunsuper for life Business* Plan from their employer's microsite when making a decision about this product, and to seek financial advice if appropriate.

Product Disclosure Statement to which this *Target Market Determination* applies

This *TMD* applies to the *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings accounts* referred to in the following *Product Disclosure Statements*:

- *Sunsuper for life Corporate Product Disclosure Statements (PDSs)* for each *Corporate Plan*.
- *Sunsuper for life Business Product Disclosure Statement (PDS)*.

2. Class of consumers that fall within this target market

A *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* is a simple accumulation style superannuation product that only allows withdrawals in limited circumstances as permitted by superannuation law. The following table describes the overall class of consumers the product is designed for.

Consumer class	Accumulating wealth	Transitioning to retirement	Working past retirement age	Insurance only consumer
Typical age range¹	Up to preservation age ² or age 60	From preservation age ² to age 65	Over 65 ³	15 - 69 ⁴
Employment status	Employed by a participating Sunsuper employer sponsor that has an agreement with Sunsuper to operate a <i>Sunsuper for life Corporate</i> or <i>Business</i> superannuation plan on behalf of its employees and are deemed eligible under the Plan rules.			
Likely objectives	Tax effective saving for retirement over the long term	Tax effective saving for retirement over the medium term	Tax effective saving for retirement or preserving retirement savings over the short to medium term	Protection against financial loss due to being incapable of working permanently or temporarily
Likely needs	<ul style="list-style-type: none"> • Ability to make all contributions permitted by superannuation law. • Ability to leverage scale and group purchasing power for competitive administration and investment fees and costs to help grow super and preserve savings in retirement. • Consolidation of multiple super accounts to save on fees and costs and maximise retirement savings. • Ability to select from a wide range of investment options to suit personal risk/return profile and investment objectives. • Ability to access super on meeting a condition of release. 			
	<ul style="list-style-type: none"> • Access to affordable and flexible insurance options that provide protection against financial loss due to death, or being permanently or temporarily incapable of working, and can be tailored to suit personal needs and circumstances. • Assistance for vulnerable consumers 			
	<ul style="list-style-type: none"> • Employer is required to make enough contributions to fund insurance premiums • No investment component required 			

1 Typical age range represents the likely ages that an individual may trigger a 'retirement' condition of release, resulting in a change in the likely objectives, financial situation and needs of consumers as they approach or transition to retirement and beyond.

2 "Preservation age" is the Government-specified age at which an individual can access superannuation benefits, provided they have permanently retired from the workforce, or take a transition to retirement income stream. Preservation age varies between 58 and 60 according to date of birth.

3 Government regulations permit individuals to access their super if they have reached the age of 65, regardless of their employment status.

4 Age range limited by insurance eligibility criteria.

Product description and key attributes

The key eligibility requirements and product attributes include:

Investment options

Consumers can choose a mix of investment options that include:

- The Lifecycle Investment Strategy;
- Actively managed and index investment options;
- Diversified (multi-asset class) and single asset class options; and
- Hedged and unhedged options.

Consumers have the ability to apply an investment strategy for their current account balance and a different investment strategy for future contributions.

Insurance options

Consumers can choose insurance cover to suit their needs, including:

- Death, total and permanent disability and income protection cover (where/if available) for those that need financial protection at an affordable price;
- Default insurance cover provided automatically to eligible consumers, or on an opt-in basis for eligible consumers under the age of 25 or with a balance of less than \$6,000;
- Tailored insurance cover options available to eligible consumers to suit personal circumstances and needs; and
- Cancelling or reducing some or all insurance cover at any time after opening an account.

The insurance benefit design has been negotiated with the employer to cater for the likely needs of its employees only.

Other product features

- Enables access to super after reaching preservation age and still employed via a *Sunsuper for life Transition to retirement income account* or on retirement via a *Sunsuper for life Retirement income account*.
- Simple financial advice to consumers about their Sunsuper accounts at no additional cost.
- Consumers with more complex advice needs, including those looking for a full financial plan may be referred to an accredited external financial adviser. Advice of this nature may incur a fee.¹ Consumers can link a registered financial adviser to their account and request the advice fee relating to their Sunsuper account(s) to be paid to their financial adviser from their account.
- Ability to nominate beneficiaries for death benefits under a preferred nomination (non-binding) or a binding nomination. Sunsuper does not offer non-lapsing binding death benefit nominations.
- Access to educational webinars, seminars, podcasts, calculators and tools at no additional cost.
- *Member Online* website and Sunsuper app to check super balance, update details or manage super and investments at consumers' convenience.
- Ability to access discounts on holidays, experiences, and everyday items through Dream Rewards.

¹ Sunsuper employees provide advice as representatives of Sunsuper Financial Services Pty Ltd (ABN 50 087 154 818 AFSL No. 227867) (SFS), wholly owned by the Sunsuper Superannuation Fund. Sunsuper has established a panel of accredited external financial advisers who are not employees of Sunsuper. Sunsuper is not responsible for the advice provided by these advisers and does not receive or pay any referral fees. These advisers will explain to you how their advice fees are determined.

Product eligibility criteria

- This product is only offered to consumers who are employees of a participating Sunsuper employer sponsor and associated employers, subject to eligibility requirements of the Plan.
- This product is only available to people receiving it in Australia. Applications from outside Australia may not be accepted.
- There is no minimum balance required to open an account.
- Persons under the age of 15 must be enrolled by their employer or the person's parent/guardian must apply on their behalf.
- Eligibility criteria for insurance cover options and when cover starts is set out in the *Sunsuper for life Corporate Insurance guide* for the relevant *Corporate* plan or the *Sunsuper for life Business Insurance guide and Plan information factsheet* for the relevant *Business* plan.

Objectives, financial situation, and needs

Investment options

The table below sets out the class of consumers that each **investment option** within the *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* has been designed for. The information below does not apply to consumers in the *Insurance only consumer* consumer class as there is no investment component.

Consumer class	Accumulating wealth	Transitioning to retirement	Working past retirement age
Typical age range	Up to preservation age or age 60	From preservation age to age 65	Over 65
Likely investment objectives	Generate wealth over the long term (10+ years)	Generate wealth over the medium (5 years) to long term (10+ years)	Generate wealth over the medium term (5 years)
Investment risk tolerance	Medium-High to High	Medium to High	Low to Medium-High
Investment horizon	10+ years	5 - 10 years	Less than 7 years
Likely suitable diversified investment options	Sunsuper's diversified investment options are designed to meet the risk/return needs of the vast majority of consumers and those who want to invest in a diversified portfolio of asset classes based on an investment strategy determined by Sunsuper.		
Lifecycle Investment Strategy	✓	✓	✓
Growth	✓	✓	✗
Balanced	✓	✓	✓
Balanced - Index	✓	✓	✗
Socially Conscious Balanced	✓	✓	✓
Retirement	✗	✓	✓
Conservative	✗	✗	✓
Single asset class options	Sunsuper's single asset class options are designed for consumers who want to build their own investment portfolio to suit their personal risk/return objectives from a range of asset classes with various investment styles:		
Shares	Australian Shares		
Australian Shares - Index	International Shares - Index (hedged)		
Emerging Markets Shares	International Shares - Index (unhedged)		
Property	Australian Property - Index		
Diversified Bonds	Diversified Bonds - Index		
Cash	Diversified Alternatives		

Sunsuper recommends that consumers seek financial advice when making any investment decision. A *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* is not designed for consumers who want to select individual assets their super is invested in (e.g. stock selection) or engage in frequent market trading/investment switching.

Refer to the *Sunsuper for life Investment guide* for further information on who the investment options have been designed for, objectives, return targets after fees and costs, strategic asset allocations and risk profiles for all investment options.

Insurance options

The table below sets out the class of consumers that the **insurance options** within a *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* has been designed for.

Consumer class	Accumulating wealth	Transitioning to retirement	Working past retirement age	Insurance only employees
Typical age range	15 - 69			
Employment status	Employed			
Likely insurance needs	<p>The amount and type of insurance cover needed by a consumer depends on a combination of factors such as their assets, liabilities, ongoing expenses, number of dependents and standard of living.</p> <p>Sunsuper's insurance cover options are designed to help consumers safeguard their and their family's financial future while providing a basic default level of insurance, through one or more of the following types of insurance cover:</p> <ul style="list-style-type: none"> • death and terminal illness cover • total and permanent disablement cover, and • income protection cover. <p>Insurance cover needs generally decline as consumers approach age 65 and financial commitments and obligations reduce. No insurance cover is available from Sunsuper from age 70.</p> <p>Employer sponsors of <i>Sunsuper for life Corporate</i> or <i>Sunsuper for life Business</i> Plans are able to negotiate customised insurance arrangements (including Death, Total & Permanent Disability, Total & Permanent Disability Assist and Income Protection as required) based on the needs of their employees.</p> <p>Sunsuper offers several insurance options to suit a consumer's personal circumstances and needs, subject to eligibility requirements.</p>			

Consumers should refer to the *Sunsuper for life Corporate Insurance guide* for the relevant *Corporate* plan or the *Sunsuper for life Business Insurance guide* and *Plan information factsheet* for the relevant *Business* plan for full details on the insurance options, including eligibility criteria, insurance premiums, terms, conditions, restrictions and exclusions.

A *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* is not designed for consumers who are seeking insurance cover within their super, but do not meet the eligibility criteria for or are excluded from either automatic or underwritten cover.

Consistency between target market and the product

A *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* that is distributed to a consumer in accordance with the *Distribution conditions* below will likely be consistent with their likely objectives, financial situation or needs for the following reasons:

Investment options

Sunsuper's investment goals are to:

- Enable consumers to achieve desired retirement outcomes by offering appropriate investment options for their needs.
- Deliver sustainably high, risk-adjusted net real returns that exceed the objectives set for each investment option.
- Improve the outcome for consumers by obtaining excellent value for money, without compromising the quality of our investment options.
- Perform strongly against our peers through the cycles to help maintain and grow the asset and consumer bases to enable us to continue to efficiently deliver a quality service for consumers.

The diversified multi-asset class options are designed to meet the risk/return needs of the vast majority of consumers. The other options are available for consumers who wish to tailor their asset allocation.

Insurance options

Sunsuper's insurance design considers the following:

- Premium structure and levels are sustainable, taking into account the impact premiums have on consumers' retirement balances.
- Product and services are designed in our collective members' best interests, are appropriate and affordable for our membership, take into account the views / feedback of members, contain innovation which is valued by a significant portion of our membership base and delivered cost effectively, are continually reviewed and updated, and are viewed as being above the industry benchmark.
- Premium cross subsidies are limited within each *Sunsuper for life Corporate* and *Sunsuper for life Business Plan* across ages and gender as far as is practicable. These Plans can access customised premiums appropriate for their overall employee profile through pooled risk arrangements.
- Consumers can easily tailor their insurance cover to meet specific needs.

Sunsuper seeks to develop and provide competitive insurance offerings which are customised for *Sunsuper for life Corporate* and *Sunsuper for life Business Plans* through flexibility in the insurance benefit design, options and premium arrangements.

Sunsuper for life Corporate and *Sunsuper for life Business Plans* provide eligible consumers with default insurance benefits which are specifically designed to take into account the needs of employees within each employer sponsored plan.

Other product attributes and features

- Sunsuper is a profit-for-members fund. Any profits made are directed back to consumers in the form of lower fees and improved services.
- Sunsuper's fee structure takes into account the demographics of the fund and the relevant *Corporate* or *Business* plan, as well as future projections with the aim to balance a low fee proposition and ongoing funding requirements:

Administration fee structure consisting of a weekly dollar-based component and a per annum percentage of account balance component has been developed with consideration of the membership structure and operating cost and results in an equitable spread of costs between lower and higher account balances.

Sunsuper does not profit from investment fees and costs.

Total fees and costs are capped at 3% of account balance if the total balance of all Sunsuper accounts held by the consumer is below \$6,000 at the end of the financial year.

No fees charged for buy-sell spreads or investment switching.

No additional fees for intra-fund advice.

Other fees and costs apply to family law splits, insurance premiums and personal advice fees where authorised by consumers.

- Sunsuper offers assistance for vulnerable consumers through translation services, phone assistance, National Relay Service (NRS), physical offices at various locations in Australia, and specialised training for Sunsuper staff.

3. How this product is to be distributed

Distribution channels

This product is designed to be distributed through the following means:

Sunsuper for life Corporate or *Sunsuper for life Business* Plans are distributed by representatives of the Sunsuper Group to employers who require a superannuation fund to meet their superannuation obligations to their employees. The terms and conditions that apply to the *Sunsuper for life Corporate* or *Sunsuper for life Business* Plan, such as fees, insurance design, and education services, are negotiated between Sunsuper and the employer prior to the offer or issue of the product to consumers.

Once a *Sunsuper for life Corporate* or *Sunsuper for life Business* Plan is available to eligible consumers, a consumer can apply for a *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* in the relevant Plan:

- By personally completing a *Membership application* form available for download from their employer's microsite. Consumers will also need to instruct their employer to pay contributions to their *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* if they want to use the account to save for retirement within the Plan.
- Via an application from the consumer's employer (who is a standard employer-sponsor) in order for the employer to satisfy its superannuation obligations to the consumer under the *Superannuation Guarantee (Administration) Act 1992*.
- Via application by a parent/guardian for a consumer under 15.
- By issue directly from Sunsuper to consumers acquiring an interest in Sunsuper due to a successor fund transfer.

Consumers can choose options on their account personally via *Member Online*, the Sunsuper app, over the phone with a Sunsuper representative or by submitting the relevant form to Sunsuper. Registered Financial Advisers may be able to transact on a consumer's account via Sunsuper's *Adviser Online* portal. Not all choices are able to be made via every channel.

Distribution conditions

This product should only be distributed under the following circumstances:

- *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings accounts* must only be issued via the *Distribution channels* stipulated above.
- This product offer is available only to people receiving it in Australia. Applications from outside Australia may not be accepted.
- Persons under the age of 15 may be enrolled by their employer. Otherwise, the person's parent/guardian must apply on their behalf by using the *Membership application* form available for download from the relevant employer's microsite.
- The product should not be distributed to a consumer who is not in the target market outlined above, unless they are eligible to join a *Sunsuper for life Corporate* or *Sunsuper for life Business* superannuation plan and have received personal financial product advice where the consumer's personal objectives, financial situation and needs have been taken into account and the best interest duty applies.

The following *Distribution conditions* apply to key attributes and features within the product:

- Consumers are limited to selecting up to 10 investment options for either current assets or future contribution directions. Investment switching may be suspended or restricted in some unfavourable market conditions or where consumers engage in frequent switching activity.
- Insurance cover is provided automatically to consumers that meet the eligibility criteria, however eligibility for automatic cover is not validated by Sunsuper unless a claim is lodged and assessed.
- Tailored insurance cover requires consumers to submit an application which is subject to acceptance by the Insurer. Consumers are required to accept any special terms, conditions, exclusions or premium loadings before tailored cover will start.
- Consumers should regularly review their insurance cover to ensure they remain eligible to maintain and claim on their cover as their life changes.
- Registered Financial Advisers can transact on a consumer's account via Sunsuper's *Adviser Online* portal only where explicitly authorised by the consumer.

Adequacy of Distribution conditions and restrictions

Sunsuper has determined that the *Distribution conditions* and restrictions outlined above are appropriate, will make it likely that consumers who acquire a *Sunsuper for life Corporate* or *Sunsuper for life Business Super-savings account* are in the target market for which it has been designed, and will assist distribution of the product being directed towards the target market for the following reasons:

- The product's eligibility criteria and permitted distribution channels restrict access to the product and make it likely that the product will be distributed to consumers in the target market for which this product is designed;
- The *Distribution conditions* and restrictions applicable to investment, insurance and other product options make it likely that the product's key attributes are consistent with the likely objectives, financial situation and needs of the consumers within the target market, and reduces the risks of potential harm to consumers exercising those options and the product being distributed to consumers outside the target market; and
- Distribution of the product to a consumer outside the target market for this product under a personal financial product advice arrangement is permitted as the financial adviser is required to take into account the personal objectives, financial situation and needs of the consumer.

4. Reporting and monitoring this Target Market Determination

We may collect the following information from our distributors in relation to this *TMD*.

Complaints

Distributors must report all complaints received in relation to the product(s) covered by this *TMD* on a quarterly basis.

This will include the substance of complaints and general feedback relating to the product and its performance.

Distributors must report complaints information within 10 business days after the end of the relevant quarter.

Significant dealings inconsistent with this *TMD*

Distributors must report if they become aware of a significant dealing in the product that is inconsistent with this *TMD* within 10 business days.

A significant dealing may include:

- A significant proportion of consumers who have acquired the product but are not in the target market, including consumers who have been specifically excluded from the target market.
- The actual or potential harm and financial loss to consumers that have acquired the product but are not in the target market.
- The nature and extent of any inconsistency of product distribution with this *TMD*.
- A significant amount of superannuation contributions paid, or funds transferred to the product from consumers outside the target market.

5. Reviewing this *Target Market Determination*

This *Target Market Determination* is **effective from 18 October 2021**. We will review this *Target Market Determination* in accordance with the below:

Initial review	By 5 October 2023
Periodic reviews	Within 24 months of last review
Review triggers or events	<p>Any event or circumstances arise that would suggest the <i>TMD</i> is no longer appropriate. This may include (but is not limited to):</p> <ul style="list-style-type: none">• A material change to the design or distribution of the product, including related documentation;• Occurrence of an ASIC reportable significant dealing;• <i>Distribution conditions</i> found to be inadequate;• External events such as persistent and materially adverse media coverage or regulatory attention;• Significant changes in metrics, including, but not limited to:<ul style="list-style-type: none">increase in investment option switching;increase in consumers exiting the product;increase in proportion of insurance cancellation rates;increase in proportion of insurance claims being denied or withdrawn;increase or persistent consumer complaints about investment options, insurance arrangements or the product in general; andpersistent underperformance of the product or its key attributes against objectives and benchmarks.• External events or a change in the underlying assets of the investment options for this product impacts their investment objectives;• A change has occurred that effects the likely objectives, financial situation or needs of the target market;• Use of Product Intervention Powers, regulator orders or directions in relation to the distribution of this product by ASIC;• Significant breach event relating to the design or distribution of this product; and• Sunsuper makes a determination for purposes of s52(9) of <i>Superannuation Industry (Supervision) Act 1993</i> that the financial interests of the consumers who hold this product are not being promoted.

Where a review trigger has occurred, this *Target Market Determination* will be reviewed within 10 business days.



What dreams are made of

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