

# Target Market Determination



## Legal disclaimer

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 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 Russell Investments Sustainable Global Opportunities Complex ETF (RGOS) (**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. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained by visiting <https://russellinvestments.com/au/disclosures>.

## Target Market Summary

This product is intended for use as a core component for a consumer who is seeking capital growth and has a very high risk and return profile for that portion of their investment portfolio. It is likely to be consistent with the financial situation and needs of a consumer with a 7 year investment timeframe and who is unlikely to need access to their capital on less than one week's notice.

## Fund and Issuer identifiers

Issuer	Russell Investment Management Ltd
Issuer ABN	53 068 338 974
Issuer AFSL	247 185
TMD contact details	<a href="mailto:funds_ddoreporting@russellinvestments.com">funds_ddoreporting@russellinvestments.com</a> +61 2 9229 5111
Fund	<b>Russell Investments Sustainable Global Opportunities Complex ETF (RGOS)</b>
ARSN	666379700
APIR Code	
Market Identifier Code	XASX
Product Exchange code	RGOS
TMD issue date	1 July 2025
TMD Version	2
Distribution status of fund	Available

## 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 and green rating methodology with appropriate colour coding:

In target market	Not in target market
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### 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.

Definitions of terms are in the Definitions section of this TMD or otherwise in the PDS.

### 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](#).

CONSUMER ATTRIBUTES	TMD INDICATOR	PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES
<b>Consumer's investment objective</b>	<b>TMD Indicator</b>	<b>Product description including key attributes</b>
Capital Growth	Green	The Fund aims to outperform the Fund's benchmark, before costs and tax, over the long term by providing exposure to a diversified portfolio of predominantly international shares.
Capital Preservation	Red	
Income Distribution	Red	
<b>Consumer's intended product use (% of Investable Assets)</b>	<b>TMD Indicator</b>	<b>Product description including key attributes</b>
Solution/Standalone (up to 100%)	Red	The Fund is an actively managed fund that invests predominantly in a broad range of international shares and equity-related securities that are listed on stock exchanges in developed and emerging international markets. At least 80% of the Fund's NAV will be invested in shares and equity-related securities selected by Russell Investments based on advice received from investment managers pursuing a Sustainable Strategy.  The Fund is managed in line with the climate objectives set out in the 2015 Paris Agreement adopted under the
Major Allocation (up to 75%)	Red	
Core component (up to 50%)	Green	
Minor allocation (up to 25%)	Green	
Satellite allocation (up to 10%)	Green	

United Nations Framework Convention on Climate Change. The Fund has targets in relation to:

- Carbon emissions reduction
- Net zero alignment and net zero engagement

Russell Investments utilises the Paris-Aligned Investment Initiative's Net Zero Investment Framework (the "Net Zero Investment Framework") as its primary target setting framework for measuring net zero alignment.

In addition, the Fund also has a process to exclude companies Russell Investments does not consider are sustainable in particular:

- companies which do not comply with good governance practices by international standards, being companies which have an exposure to the following activities above applicable materiality thresholds: controversial weapons; and companies with a significant involvement with oil sands, arctic oil and gas, shale energy, thermal coal, palm oil, gambling, adult entertainment and tobacco; and
- companies which do not comply with good governance practices by international standards, being the United Nations Global Compact Principles; (**Excluded Securities**).

Up to 10% of the NAV of the Fund may be held in cash.

Derivatives are used to implement the investment strategy of the Fund and to manage risk. The Fund uses Equity Index Futures to gain a material exposure to international shares in the desired country, region and/or equity markets. The Fund's notional exposure to Equity Index Futures may exceed 10% the NAV of the Fund. As such, the Fund is considered a "complex" ETF. Where the Fund invests in derivatives, including Equity Index Futures, the exclusions and net zero targets described above do not apply. Please refer to the "How the Fund invests" section of the PDS for additional information about how the Fund uses derivatives.

We may change the investment strategy for the Fund at any time at our discretion.

Please refer to the "ESG Considerations" section of the PDS for additional information about the Fund's environmental, social and governance (ESG) considerations and how they are assessed, including:

- the processes and criteria we use to assess Sustainable Strategies;
- the Net Zero Investment Framework and the Fund's targets for carbon emissions reduction, net zero alignment and net zero engagement; and
- the screens we use when determining whether a security is an Excluded Security.

Consumer's investment timeframe	TMD Indicator	Product description including key attributes
Minimum investment timeframe	7 years	The minimum suggested timeframe for holding investments in the Fund is 7 years.

Consumer's Risk (ability to bear loss) and Return profile	TMD Indicator	Product description including key attributes
Low	Red	The Fund is very high risk in nature, may have very high volatility and potential losses (SRM 6 or 7), and seeks to maximise returns over the medium or long term.
Medium	Red	
High	Red	
Very high	Green	
Extremely high	Green	
Consumer's need to access capital	TMD Indicator	Product description including key attributes
Within one week of request	Green	As an ETF, the Fund is tradeable on the ASX, under normal circumstances.
Within one month of request	Green	
Within three months of request	Green	
Within one year of request	Green	
Within 5 years of request	Green	
Within 10 years of request	Green	
10 years or more	Green	
At issuer discretion	N/A	

## Distribution conditions/restrictions

DISTRIBUTION CONDITIONS	DISTRIBUTION CONDITIONS RATIONALE
This Fund is quoted on the ASX. Consumers buy and sell units in the Fund on the ASX via a stockbroker or share trading platform.	Consumers buy or sell units in the Fund directly using a stockbroker or share trading platform.
<p>The Fund is also available to persons investing through a platform product including:</p> <ul style="list-style-type: none"> <li>an Investor Directed Portfolio Service (IDPS) or IDPS-like scheme; or</li> <li>an investment platform, superannuation wrap or master trust; or nominee or custody service; or</li> <li>any other trading platform or distributor with whom the issuer authorises distribution.</li> </ul>	The issuer of each platform product or distributor has its own obligations as a distributor to take reasonable steps that will or are reasonably likely to result in retail product distribution conduct being consistent with this TMD.
The Fund may also be available to purchase as part of a separately managed account (SMA).	The issuer of each platform product or distributor has its own obligations as a distributor to take reasonable steps that will or are reasonably likely to result in retail product distribution conduct being consistent with this TMD.

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## 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	1 July 2025
Subsequent review	3 years and 3 months

## 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.	As soon as practicable but no later than 10 business days following end of calendar quarter.	All distributors
Significant dealing outside of target market, under 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.	Not applicable

If practicable, distributors should adopt the FSC data standards for reports to the issuer. Distributors must report to Russell Investment Management Ltd using the method specified at <https://russellinvestments.com/au/ddoreporting/>.

## Important Information

This Target Market Determination (**TMD**) is made by Russell Investment Management Ltd ABN 53 068 338 974, AFS Licence 247185 (**RIM**). RIM is the responsible entity and issuer of units in the Fund.

The material provided here is for general information only and does not take account of any investor's personal financial situation or needs. The information in this material is thus not a recommendation, offer or solicitation to buy or sell any securities or to adopt any investment strategy. The opinions expressed may change as subsequent conditions vary. To the extent permitted by law, neither of RIM nor any of its respective related bodies corporate, associates, and employees, shall have any liability whatsoever (in negligence or otherwise) for any loss however arising from any use of the material or otherwise in connection with this TMD.

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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 (such as 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.
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.
<b>Portfolio diversification (for completing the key product attribute section of consumer's intended product use)</b> Note: exposures to cash and cash-like instruments may sit outside the diversification framework below.	
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).
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.



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## Consumer's intended investment timeframe

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.

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

This TMD uses the Standard Risk Measure (SRM) to estimate the likely number of negative annual returns for this product over a 20 year period, using the guidance and methodology outlined in the **Standard Risk Measure Guidance Paper For Trustees** (note the bands in the SRM guidance differ from the bands used in this TMD). However, 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 (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some products may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; 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.

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Low For the relevant part of the consumer's portfolio, the consumer:

- has a conservative or low risk appetite;
- 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
- is comfortable with a low target return profile.

The consumer typically prefers stable, defensive assets (such as cash).

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Medium For the relevant part of the consumer's portfolio, the consumer:

- has a moderate or medium risk appetite;
- 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
- is comfortable with a moderate target return profile.

The consumer typically prefers defensive assets (for example, fixed income).

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High For the relevant part of the consumer's portfolio, the consumer:

- has a high risk appetite;
- 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
- seeks high returns (typically over a medium or long timeframe).

The consumer typically prefers growth assets (for example, shares and property).

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Very high For the relevant part of the consumer's portfolio, the consumer:

- has a very high risk appetite;
- 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
- seeks to maximise returns (typically over a medium or long timeframe).

The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds and alternative investments).

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Extremely high For the relevant part of the consumer's portfolio, the consumer:

- has an extremely high risk appetite;
- can accept significant volatility and losses; and
- seeks to obtain accelerated returns (potentially in a short timeframe).

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).

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## Consumer's need to access capital

This consumer attribute addresses the likely period of time between the making of a request for a 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 should be considered.

## Distributor Reporting

**Significant dealings** 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.

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.

Dealings outside this TMD may be significant because:

- 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).

In each case, the distributor should have regard to:

- the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes);
- 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 ratings attributed to the consumer).

Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if:

- it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the quarter;
  - the consumer's intended product use is *solution/standalone*;
  - the consumer's intended product use is *core component* or higher and the consumer's risk/return profile is *low*; or
  - the relevant product has a green rating for consumers seeking *extremely high* risk / return.
-