TARGET MARKET DETERMINATION FOR SUREPLAN GOLD

A Target Market Determination (TMD) is required under Section 994B of the Corporations Act 2001 (Cth). It sets out the target market for the product, triggers to review the target market and certain other information. It forms part of Sureplan Gold's design and distribution framework for the product.

This document is **not** a product disclosure statement and is **not** a summary of Sureplan Gold's features or terms. This document does not consider any person's individual objectives, financial situation or needs. Persons interested in acquiring this product should carefully read the Product Disclosure Statement for Sureplan Gold before deciding whether to commence a policy.

Name of product	Sureplan Gold
TMD date	10 June 2026
TMD version	2
TMD end date	N/A
Product description	Sureplan Gold is a funeral bond and is used by a consumer to accumulate funds to be put towards meeting the cost of their funeral. Funeral Bond funds **cannot be accessed after the initial 30 day cooling off period** and consequently provides a benefit **only** upon the death of a bond holder.
Key product attributes	• Contributions can be made either as a lump sum, regular or ad-hoc payments, subject to a minimum of $50; • Subject to the Funeral Bond Allowable Limit, a funeral bond may be treated as an Exempt Asset by Centrelink/DVA; • If a bonus is allocated, it does not form part of a consumer's assessable taxable income; • At the time the funeral benefit is claimed from a friendly society issued funeral bond, a rebate of the tax paid over the period of the policy may be claimed and added to the funeral benefit payable; • Funds cannot be accessed after the initial 30 day cooling off period.
Issuer Name	Sureplan Friendly Society Ltd (Sureplan)
Issuer AFSL	245522
Issuer ABN	70 087 649 456

Target Market

The Target Market is the class of persons who are the type of consumer set out below, who have the needs and objectives set out below and are in the financial situation set out below.

Approach to target market

TMD indicator key

The Consumer Attributes for which the product is likely to be appropriate have been assessed using a red/amber/green rating methodology with appropriate colour coding:

In target market	Potentially in target market	Not considered in target market

Instructions

Column 1 in the tables below list various Consumer Attributes applicable for the class of consumers considering this product and Column 2 indicates Sureplan Gold's consistency according to the three indicators above.

Generally, a consumer is unlikely to be in the target market for Sureplan Gold if:

- one of more of their Consumer Attributes correspond to a red rating; or
- three or more of their Consumer Attributes correspond to an amber rating.

Type of Consumer

The consumer can be an individual or a couple.

Consumer Objectives

Sureplan Gold's target market encompasses a consumer who is willing to forsake access to their capital and who desires to make either a lump sum, regular or ad-hoc contributions to accumulate funds to be put towards the cost of their funeral by allocating funds to a funeral bond:

- As part of a funeral pre-planning process when suffering from a potentially life-threatening illness;
- As they wish to minimise the need for their family to pay for their funeral expense;
- As they wish to maximise their funeral benefit through minimising their taxation liability;
- As they wish to reduce their assessable assets to maximise their pension entitlement;
- As they wish to ensure there are sufficient funds available to pay for their funeral as they do not have family members who may be able to meet the cost;
- As they wish to have input into their funeral arrangements and make provision for the cost of their preferred funeral service.

Contribution amount limits

Amount $	Product consistency with target market	Product description including key attributes
Under $50		Minimum of $50 required per transaction. Over $15,000 requires funeral expense substantiation. Over $30,000 breaks fit-for-purpose test.
$50 to $15,000		
Over $15,000 to $30,000		
Over $30,000		

Choice of asset allocation

Consumer's desired level of choice	Product consistency with target market	Product description including key attributes
Consumer desires the ability to select asset allocation.		Sureplan Gold does not offer investment options and only invests in low-risk assets.
Consumer desires default investment strategy.		

Age at time of commencing funeral bond

Age (yrs)	Product consistency with target market	Product description including key attributes
Under 18		Is available to all ages but the average age of commencement of a Sureplan Gold policy is 76. If consumer is under 18 years of age, the application must be signed by parent or guardian.
Under 40 with elevated mortality risk		
18-40		
41-70		
Over 70		

Life expectancy at time of commencing funeral bond

Life expectancy	Product consistency with target market	Product description including key attributes
10 years or less		Average duration of Sureplan Gold policy is under 7 years.
Over 10 years to 40 years		
Over 40 years		

Access to capital

Consumer's capital access requirement	Product consistency with target market	Product description including key attributes
Consumer needs access to capital.		After the first 30-day cooling-off period, consumer does not have access to funds.
Consumer does not need access to capital.		

Number of funeral bonds held for bond to be treated as exempt asset

Number of funeral bonds held	Product consistency with target market	Product description including key attributes
Single policy		If holding more than two policies, an asset-tested pensioner has the option of nominating which two of these policies are to be assessed by Centrelink/DVA.
Two policies		
More than two policies		

Body transportation insurance option available

Consumer's desired body transportation option	Product consistency with target market	Product description including key attributes
Body transportation insurance required.		Sureplan Gold has optional body transportation insurance cover.
Body transportation insurance not required.		

Appropriateness

With consumers having an average age of 76 at the time of commencement of a Sureplan Gold policy, feedback from consumers and funeral director distributors strongly confirms the appropriateness of the low-risk, fixed interest and cash investment strategy. Consumers' prime investment concern remains the security of capital. Also, the fixed interest/cash investment strategy is consistent with the average policy term of less than 7 years. A Sureplan Gold policy holder has never suffered a capital loss as Sureplan Gold has never paid a benefit less than the amount contributed.

Approximately 90% of new business for Sureplan Gold is introduced by funeral businesses which ensures the TMD is consistent with the "funeral pre-planning" consumer objective. Of these, based on the amount of initial contribution, 10% are also looking to maximise their pension entitlement which is also consistent with the TMD.

Distribution Channels and Conditions

The distribution of the Sureplan Gold policy is limited to the following channels:

Distribution Channel	Distribution Condition
AFS licence holder	Funeral bonds are a financial product under Section 763 of the Corporations Act.
Funeral service employee	Exemption granted under reg 7.6.01(ta) of the Corporations Act.
Direct distribution	Via Sureplan's website and member recommendation. TMD related information is clearly provided in the Sureplan Gold/BTFF PDS to assist consumers in determining whether Sureplan Gold meets their needs and objectives.

Sureplan considers that the distribution conditions will make it likely that consumers who purchase a Sureplan Gold policy are in the target market because:

a) Sureplan's website content and advertising material is directed towards consumers in the target market; and
b) Of the past performance in relation to the distribution of Sureplan Gold via these established distribution channels (particularly funeral services employees).

Review Triggers

A review of the TMD is required when any of the following review triggers has occurred:

a) ASIC reportable significant dealing outside of TMD.
b) Failure to preserve member capital.
c) Transfer or re-classification of Sureplan Gold.
d) Significant or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) regarding product design, product availability or any distribution condition that suggests this TMD is no longer appropriate.
e) Material changes to the key product attributes, terms and/or conditions that reasonably suggests that this TMD is no longer appropriate.
f) The use of Product Intervention Powers, regulator orders or directions in relation to the distribution of this product which reasonably suggests that this TMD is no longer appropriate for the "pension maximisation" cohort.
g) A significant breach event relating to the design or distribution of Sureplan Gold which would reasonably suggest (i) Sureplan Gold is unsuitable for a particular cohort of consumers and/or (ii) this TMD may no longer be appropriate.

h) Centrelink/DVA ceasing to treat funeral bonds as Exempt Assets would suggest this TMD may no longer be appropriate.

Where a review trigger has occurred, or another event or circumstance has occurred, that would reasonably suggest that the determination is no longer appropriate, this TMD will be reviewed within 10 business days.

Maximum period for reviews

Review periods	Maximum period for review
Initial review	1 year and 3 months
Subsequent review	3 years and 3 months

Distributor Information Reporting Requirements

Regulated persons	Requirement	Reporting deadline
All distributors	A distributor should advise of any significant dealing outside the TMD.	Within 10 business days of distributor becoming aware of event.
All distributors	A distributor should advise of any non-significant dealing outside the TMD.	Within three months of distributor becoming aware of event.
All distributors	A distributor is aware of a complaint where the nature of the complaint refers to product design, product availability and distribution conditions.	Within 10 business days of distributor becoming aware of complaint.

Distributors to be advised to email info@sureplan.com.au with reportable TMD issue and upon receipt this will be forwarded to the Managing Director and Business Development Manager for actioning.