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Target Market Determination

For Australia Pacific Income Fund ARSN 159 529 530

How to use this document

The purpose of this document is to provide guidance on completing a Target Market Determination (TMD) to meet the requirements of the Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Bill.

In using this document consider the nature of the product, including any product variations, and the distribution approach when creating TMD.

[Download the document here](#)

1. About this document

This target market determination (TMD) seeks to offer consumers, distributors and staff with an



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Statement (PDS) and any supplementary documents which outline the relevant terms and conditions under the product when making a decision about this product.

Australia Pacific Mortgage Fund Pty Ltd, AFSL No. 416441, ACL 463964, ACN 140 213 690 is the responsible entity of the Australia Pacific Income Fund.

The Australia Pacific Income Fund (APIF) Product Disclosure Statement is to which this target market determination applies.

This TMD applies to the APIF referred to in the following :

- APIF - Product Disclosure Statement

Date from which this target market determination is effective

November 7th 2025

2. Class of consumers that fall within this target market

The information below summarises the overall class of consumers that fall within the target market for APIF, based on the product key attributes and the objectives, financial situation and needs that it has been designed to meet.

This product has been designed for consumers whose likely objectives, financial situation and needs (as listed below) are aligned with the product (including the key attributes).

Disclaimer

The borrowing component of this product is for those who:

- Seek debt funding for residential and commercial property that meet its credit criteria.



- Borrowers will typically be companies. Security for the loans will primarily be non-coded residential investment and commercial properties and land.

Product description and key attributes

The key eligibility requirements and product attributes of APIF are:

For investors:

Both Wholesale and retail investors may invest in APIF. Minimum investment in the Fund is \$5,000. Investors join by applying for Units of the Fund. Members have rights to receive income or capital distributions in which they are an Investor in proportion to their share of contribution to the Fund.

To maintain a stable and secure investment all monies are invested only on mortgage securities in Australia and do not exceed set LVRs. The income earned by the Fund in a Mortgage Investment will vary to reflect the risk of return, for example:

- the type of security property;
- the location of the security property;
- the priority of the mortgage security;
- the loan to value ratio of the loan;
- the term of the investment; and
- the likelihood of early repayment by the borrower.

For borrowers:

The Fund will not provide funding to related parties.

- Maximum loan terms of 2 years, interest repayments are monthly interest only in advance, establishment fees range from 1.00% to 1.50% + GST. Valuation, legal and quantity surveyor fees are charged at cost.
- The Responsible Entity approves and packages Mortgages for the Fund. Each Mortgage



The Fund will occasionally provide loans for residential zoned vacant land or residential zoned broad acre land or subdivision whereby the Investment Committee see a secure low risk opportunity.

Examples of principal property types include:

- Non-coded residential investment houses, townhouses and apartments;
- Residential zoned vacant land with town planning approval;
- Residential zoned broad acre vacant land;
- Retail/sub-regional shopping centres with a major anchor tenant and supporting specialty shops
- Single or a series of "strip" shops in major locations;
- Office buildings in CBD or other major residential and commercial areas; and
- Industrial-small industrial complexes generally located in transport corridors.
- Small to medium density majority residential developments.

Objectives, financial situation, and needs

This product has been designed for individuals who:

For investors:

To invest in a medium risk managed investment scheme and receive fixed income yields from mortgage security secured by the Fund's registration over real estate throughout Australia.

To provide stable income and a level of capital security. The Fund packages mortgage securities to suit the Investors in the Fund. Each mortgage security pays a defined and clear fixed income yield to the Fund. The mortgage is registered in the Fund's name and the Fund has legal or beneficial title to the security property.

For borrowers:

Require debt funding for residential, construction/development, vacant land and commercial property.



Consistency between target market and the product

For investors:

Given that this is a contributory fund investing in short term loans there will generally be a wide target market of investors. That noted, the fund still seeks to attract investors who may invest significant sums to ensure that there remains sufficient pools of funds to meet borrower demand.

For borrowers:

The target industry sectors are residential, residential zoned vacant land, commercial, retail, offices and industrial properties and aimed at business purpose lending only with no owner-occupied home loans. This is based on an analysis of the key terms, features and attributes of the product and a finding that these are consistent with the identified class of consumers.

3. How this product is to be distributed

Distribution channels

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

- Online marketing, authorised representatives and word of mouth for both investors and borrowers.

Distribution conditions

This product should only be distributed under the following circumstances:

- To individuals and/or companies that meet the eligibility requirements; individuals that have the appropriate capacity and in accordance with lending guidelines; by third party distributors authorised by us to distribute the products.

Adequacy of distribution conditions and restrictions

Distribution is based on an assessment of the distribution conditions and restrictions and that



Loan applications with exceptions to the Fund's Standard Credit Criteria must be approved unanimously by the Investment Committee.

4. Reviewing this target market determination

We will review this target market determination in accordance with the below:

Initial review
Annually from the effective date.
Periodic reviews
Annually from the initial review.
<p>Review triggers or events</p> <p>Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited):</p> <ul style="list-style-type: none"> • a material change to the design or distribution of the product, including related documentation; • the occurrence of a significant dealing; • distribution conditions found to be inadequate; • external events such as adverse media coverage or regulatory attention; and • Significant regulatory changes negatively impacting the capability of the responsible entity to adequately and efficiently maintain the product or target market • Inability to obtain sufficient insurance at reasonable cost

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

5. Reporting and monitoring this target market determination



Distributors will report all complaints in relation to the product(s) covered by this TMD as required. This will include written details of the complaints.			
Significant dealings			
Distributors will report if they become aware of a significant dealing in relation to this TMD within 10 business days.			
Other information required			
Sitemap	Additional Information	About us	Contact us
N/a		We seek to	For all enquiries

Borrowers			
Corporate Overview	Terms of Use	maximise your total return and provide capital stability by investing in a portfolio of variable rate, first ranking registered mortgages on commercial and/or residential property.	please call us on 03 8621 8400 or enter your details on our enquiry form .
Investors	Privacy Policy		
Bond Prices	Target Market Determination - APIF		
Contact Us	Target Market Determination - APPF		
	Complaints Process		
	Disclaimer		