



Target Market Determination – GDA Diversified Property Trust

Legal disclaimer

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). 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 GDA Securities Ltd's (**GDA**) 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 the GDA Diversified Property Trust (**Trust**) 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 contacting our office on (03) 6234 4413 or on our website at www.gdagroup.com.au/property-funds/dpt.

Target Market Summary

This product is likely to be appropriate for a consumer seeking income with the potential for capital growth and to be used as a core component within a portfolio where the consumer has a medium or long investment timeframe and a medium risk/return profile.

Trust and Issuer identifiers

Issuer	GDA Securities Ltd
Issuer ABN	58 105 612 600
Issuer AFSL	233 013
Trust	GDA Diversified Property Trust
ARSN	108 321 651

APIR Code	GDA0001AU
ISIN Code	AU60GDA00016
Date TMD approved	25 July 2025
TMD Version	2.0
<i>TMD Status</i>	Current

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/amber/green rating methodology with appropriate colour coding:

In target market	See Issuer's Instructions*	Not in target market
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** Please see the 'Product description including key attributes' in the table below of Issuer's instructions*

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, or
- **three or more** of their Consumer Attributes correspond to an **amber** rating.

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	TMD Indicator	Product description including key attributes
Consumer’s investment objective		
Capital Growth	In target market	The Trust aims to provide investors with a monthly tax-advantaged income combined with the potential for long-term capital growth by investing primarily in Australian property assets, diversified across geography, sector, type and tenant, that meet the Trust’s investment criteria.
Capital Preservation	See Issuer’s instructions	
Capital Guaranteed	Not in target market	The Trust is designed and expected to have low volatility and capital growth over the recommended investment term of not less than five years however, the value of the Trust is subject to movements in the value of its real property. The Trust may be suitable for an investor who seeks to preserve their capital but who accepts there is a risk they may lose some or all of their money. The Trust is not suitable for an investor who cannot accept any loss of their capital. The Trust uses gearing which increases the potential for capital losses (and gains). Investors should therefore have a higher risk tolerance than if the Trust did not use gearing. The Trust is not capital guaranteed.
Income Distribution	In target market	
Consumer’s intended product use (% of Investable Assets)		
Whole portfolio (up to 100%)	Not in target market	The Trust primarily invests in a portfolio of Australian property assets diversified across geography, sector, type and tenant. The Trust will invest in Australian property assets both directly and indirectly, by investing in Property Trusts where those Property Trusts invest in Australian properties. The Trust may also invest in more liquid assets, including listed property securities (e.g. A-REITs), cash and cash equivalent products. The Trust’s exposure to these assets is intended to provide an income source on any surplus capital not immediately required for investment or while direct property assets are being sourced.
Major allocation (up to 75%)	Not in target market	
Core allocation (up to 50%)	Not in target market	
Minor allocation (up to 25%)	See Issuer’s instructions	
Satellite allocation (up to 10%)	In target market	The Trust is suitable for investors seeking income, with the potential for long-term capital growth who have a medium to long-term investment horizon. Therefore, the Trust’s portfolio diversification is Low to Medium. Investors should use the Trust as a Satellite allocation to reduce investment risk through diversification across an appropriate portfolio of investments. Investors may consider using the Trust as a Minor allocation where an investor has a high conviction to the Trust’s strategy and has at least a High risk/return profile.

Consumer Attributes	TMD Indicator	Product description including key attributes
Consumer's investment timeframe		
Short (≤ 2 years)	Not in target market	The Trust is managed having regard to an investment term of not less than five years. The Issuer intends to offer Liquidity Events every five years and they are the main mechanism for investors to partially or fully redeem Units. The next Liquidity Event will be held in, or around, June 2030 and then every five years thereafter. During the relevant five-year terms between Liquidity Events, the Issuer intends to offer Limited Withdrawal Offers every three months during the Trust term, subject to the Trust having available liquid assets. These Limited Withdrawal Offers are a secondary, limited, mechanism for investors to redeem Units and should not be relied upon to provide liquidity. Limited Withdrawal Offers will not be held while a Liquidity Event is in progress. The Trust is therefore not suitable for investors who require access to their capital prior to the next Liquidity Event.
Medium (2 - 5 years)	Not in target market	
Long (> 5 years)	In target market	
Consumer's Risk (ability to bear loss) and Return profile		
Low	Not in target market	The Trust's objective is to provide investors with monthly tax-advantaged income combined with the potential for long-term capital growth. However, there are risks involved in the Trust as disclosed in the PDS, which may include the following: <ul style="list-style-type: none">• The Trust may not have sufficient liquid assets to offer any liquidity opportunities to investors in the future. If it is necessary for the Trust to dispose of assets to fund redemptions, there is a risk that the Trust may not be able to realise sufficient assets in a timely manner or at an optimal sale price. This may affect the ability to return capital to investors and may reduce the Unit Price.• The value of the Trust's investments may decline, which may result in a fall in the value of an investment in the Trust.• The Trust may borrow up to 55% of the value of its assets (on a look-through basis) which may amplify capital losses (or gains).• The Trust may not make regular distributions, or at all, as the income available for distribution is dependent on a variety of risks associated with an investment in property (such as risks that the tenants may default on the terms of their leases). It is expected the Trust may experience an estimated 2 to less than 3 negative returns over a 20 year period (SRM 3) (Medium risk).
Medium	In target market	
High	In target market	
Very High	See Issuer's instructions	
Extremely High	See Issuer's instructions	

Consumer Attributes	TMD Indicator	Product description including key attributes
		The Trust is suitable for investors with a Medium or High risk and return profile. The Trust may also be suitable for an investor with a Very High or Extremely High risk and return profile where the investor considers the moderate to high return objective for the Trust is an acceptable level of return for the investor. Investors seeking very high or extremely high returns will not be in the target market for the Trust.
Consumer's need to withdraw money		
Daily	Not in target market	GDA intends to offer Investors the opportunity to partially or fully redeem Units through Five-Year Liquidity Events (Liquidity Event) and Limited Three-Monthly Withdrawal Offers (Limited Withdrawal Offers).
Weekly	Not in target market	
Monthly	Not in target market	
Quarterly	Not in target market	
Before the next Liquidity Event expected in June 2030	Not in target market	Liquidity Events are held every five years and they are the main mechanism for Investors to partially or fully redeem Units. GDA will aim to satisfy accepted withdrawal requests made in response to a Liquidity Event within 365 days of the closing date of the Liquidity Event.
At the next Liquidity Event expected in June 2030 or longer	In target market	<p>During the relevant five-year terms between Liquidity Events, GDA intends to offer Limited Withdrawal Offers every three months during the Trust term, subject to the Trust having available liquid assets. These Limited Withdrawal Offers are a secondary, limited, mechanism for Investors to redeem Units and should not be relied upon to provide liquidity. Limited Withdrawal Offers will not be held while a Liquidity Event is in progress.</p> <p>The Trust has no fixed termination date however, Liquidity Events are intended to be offered every five years and they are the main mechanism for investors to partially or fully redeem Units. The next Liquidity Event will be held in, or around, June 2030, and then every five years thereafter. The Trust seeks to satisfy redemption requests within 365 days of the closing date of the Liquidity Event. This may mean redemption requests are satisfied in one or more instalments and may not be fully paid until June 2031.</p> <p>In addition, during the relevant five-year terms between Liquidity Events, the Issuer intends to offer Limited Withdrawal Offers every three months during the Trust term, subject to the Trust having available liquid assets. These Limited Withdrawal Offers are a</p>

Consumer Attributes	TMD Indicator	Product description including key attributes
		<p>secondary, limited, mechanism for investors to redeem Units and should not be relied upon to provide liquidity. Limited Withdrawal Offers will not be held while a Liquidity Event is in progress.</p> <p>Withdrawals from the Trust may be cancelled, deferred, brought forward, scaled back or suspended by the Issuer in exceptional circumstances such as where it is impracticable to offer liquidity or it would not be in the best interests of remaining investors for liquidity to be offered at the relevant time.</p>

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 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.

The Issuer considers that the distribution conditions will make it more likely that the investors who acquire Units in the Trust are in the target market on the basis of:

- the Trust's advertisements and website content is directed towards consumers in the Trust's target market;
- the online and paper application forms for the Trust include specific questions and alerts relating to this TMD and relevant to the distribution conditions;
- the distributors' past performance in relation to the distribution of financial products, about which the Issuer is aware; and
- any other relevant information about a distributor, about which the Issuer is aware.

Distribution conditions/restrictions

Distribution Condition	Distribution Condition Rationale
Direct	<ul style="list-style-type: none"> • Direct investors who are wholesale or sophisticated investors can invest in the Trust. • Retail investors are asked to complete an online or paper application form, including filtering questions relating to the TMD. The Issuer will review the information provided in response to the filtering questions, assess those answers against the Trust's key attributes (set out above). Where the Issuer concludes the investor is not likely to be within the target market, the Issuer may reject the application or seek further information from the investor.
Platform/Wrap	<ul style="list-style-type: none"> • Additional steps are not required for advised clients beyond consideration of the issuer's TMD by the adviser.

Distribution Condition	Distribution Condition Rationale
	<ul style="list-style-type: none"> Unadvised clients may not be able to access the Trust unless the platform provider has a process where the client is asked to complete basic filtering questions relating to the TMD.
Adviser	<ul style="list-style-type: none"> Investor to confirm in the online or paper application form that they are financially advised. Financial advisers to provide details of their AFS licence and confirm that they have reviewed and considered the TMD in providing personal advice to the investor.

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.
Where the Issuer is unable to provide liquidity for all investors wishing to redeem their investment within 12 months of a Five-Year Liquidity Event.
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	Complete
Subsequent review	At least once every year since the date of the last review of the TMD (for whatever reason).

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 design, product availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	As soon as practicable but in any case 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 in any case within 10 business days after distributor becomes aware of the significant dealing.	All distributors
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If practicable, distributors should adopt the FSC data standards for reports to the Issuer. Distributors must report to the Issuer using the method specified below.

Complaints

Distributors can report complaints to GDA Securities Ltd via email at investor@gdas.com.au.

Significant Dealings

Distributors can report Significant Dealings to GDA Securities Ltd via email at investor@gdas.com.au.

Disclaimer

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This material 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)	
Whole portfolio (up to 100%)	The consumer may hold the investment as up to 100% of their total investable assets. The consumer is likely to seek a product with high portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total investable assets. The consumer is likely to seek a product with medium to high portfolio diversification.
Core allocation (up to 50%)	The consumer may hold the investment as up to 50% of their total investable assets. The consumer is likely to seek a product with at least medium portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total investable assets. The consumer is likely to seek a product with low to medium portfolio diversification.
Satellite allocation (up to 10%)	The consumer may hold the investment as up to 10% of the total investable assets. The consumer may seek a product with low portfolio diversification.
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.
Medium	1-2 asset classes, single country, broad exposure within asset class, e.g. Aussie equities "All Ords".

Term	Definition
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 (2-5 years)	The consumer has a medium investment timeframe and is unlikely to redeem within two to five years.
Long (> 5 years)	The consumer has a long investment timeframe and is unlikely to redeem within five years.
Consumer's Risk (ability to bear loss) and Return profile	
<p>The Issuer has adopted 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>. The assessment has been undertaken assuming likely returns after fees and costs but before taxes. 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.</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> <p>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.</p>
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)).</p> <p>Consumer typically prefers growth assets such as shares, property and alternative assets.</p>
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 time frame).

Term	Definition
	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).
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 Trust that is not consistent with the TMD. Section 994G of the Act requires the Issuer to notify ASIC if it becomes aware of a significant dealing in the Trust that is not consistent with the TMD. Neither the Act nor ASIC defines when a dealing is ‘significant’ and distributors and the Issuer have discretion to apply its ordinary meaning. Whether or not a dealing is significant is a matter to be determined in the circumstances of each case and must be determined having regard to ASIC’s policy in RG 274.</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 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> <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), 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"> 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> or the relevant product has a green rating for consumers seeking Extremely High risk/return.