

Alternative Risk Management Services Pty Ltd Target Market Determination (TMD)

Early Learning Discretionary Trust

Target Market Determination (TMD)

This TMD applies to the Early Learning Discretionary Trust ('the Trust', 'the Product') as described in the Product Disclosure Statement issued by Alternative Risk Management Services Pty Ltd (incorporating any applicable Supplementary Product Disclosure Statement) ('PDS') in relation to cover provided to the Early Learning Discretionary Trust and its Members as defined in the PDS ('the Trust and its Members', 'you', 'your').

This TMD has been prepared by Alternative Risk Management Services Pty Ltd ABN 70 649 963 191, AFSL 530893, the product issuer and trustee of the Trust (we, us, our).

Product name Early Learning Discretionary Trust

TMD publication date 30 June 2025

TMD review date 30 June 2026

Important information about this TMD

The Corporations Act 2001 (Cth) ('Corporations Act') requires us to make this TMD and include certain information in it. Any terms used in this TMD that are defined in the Corporations Act have the same meaning as in the Corporations Act.

This TMD is not intended to be a consumer facing disclosure document and does not form part of the terms of the Product.

Any information or examples given in the TMD must not be read as a complete list of eligibility or the standard terms and conditions and limitations that apply to the Product.

The Trust and its Members must refer to the PDS, any associated insurer's policy wordings and documents to understand the terms and conditions of the Product. The PDS and the insurer's policy wording (including, if applicable, the insurer's product disclosure statement) are provided to the Trust and its Members through Howden Insurance Brokers (Australia) Pty Ltd ABN 79 644 885 389, AFSL 539613 or other representatives appointed by us.

This TMD does not consider any person's individual needs, objectives or financial situation and does not provide financial product advice or recommendation on the cover.

The Product is designed to offer cover the Trust and its Members whose likely needs, objectives and financial situation are aligned to those below.

Summary of key attributes of product and key likely needs, objectives and financial situation of target market they meet

This product has been designed for The Trust and its Members in the target market as set out below and has been established to help manage the risk of material loss or damage to property and consequential loss for the Trust and its Members.

This Product is made up of two parts:

- the Trust cover. This is risk cover, but it is not insurance because the trustee has discretion whether or not to pay a claim and how much to pay; and
- the insurance cover, which is insurance. A member of the Trust has a third party beneficial interest in the insurance policy which is purchased by the trustee for the Trust and its Members and is subject to the terms and conditions of the insurer's policy.

Who is our target market for the product?

To be eligible, a person must be **all** of the following:

- ✓ an incorporated body, person, company, trust or other legal entity engaged in the provision of early childhood education, care or associated activities; and
- ✓ a contributing member of the Trust; and
- ✓ a person who meets the eligibility criteria for the issue (including new business, renewals and variations as applicable) of the Product that has been approved by us in writing.

Examples of who isn't in our target market

By way of example, if **any** of the following apply and at a very high level only, **a person won't be in the target market if** they:

- ✗ are not an incorporated body, person, company, trust or other legal entity engaged in the provision of early childhood education, care or associated activities; or
- ✗ are not a contributing member of the Trust; or
- ✗ do not meet the eligibility criteria for the issue (including new business, renewals and variations as applicable) of the Product that has been approved by us in writing; or
- ✗ want insurance protection rather than discretionary cover in respect of their industrial special risks cover; or
- ✗ cannot afford the contributions or for whom the payment options are not suitable; or
- ✗ want industrial special risks cover for higher limits; or
- ✗ cannot afford to pay the deductible amount(s) we offer or want a lower deductible to apply.

Please note that although a person falls within our target market, this does not necessarily mean that the cover is right for their individual needs, objectives and financial situation. It is important that the person takes into consideration the PDS and other information provided by us as well as the insurer's policy wording and the insurer's product disclosure statement (and/or seeks professional advice) before making their decision.

Distribution Conditions

Cover can only be issued by us to the Trust and its Members and distributed by Howden Insurance Brokers (Australia) Pty Ltd ABN 79 644 885 389, AFSL 539613 ('Insurance Broker').

The Insurance Broker must not engage in retail distribution conduct in relation to this Product if we have notified them or they are aware that, the TMD is no longer appropriate, has been replaced or the Product has been suspended or is no longer offered.

The Insurance Broker distributing this Product must not engage in retail distribution conduct unless it has been authorised in writing by us to do so and this authority has not been cancelled or suspended.

TMD Review

The TMD will be reviewed within twelve (12) months from the TMD publication date and subsequently every 24 months, unless agreed otherwise, after the end of the previous review. We will also review the TMD within 10 business days of becoming aware of a Review Trigger (specified below) and where otherwise required by law.

Review Triggers

There are events or circumstances that, if identified to or by us as part of our review framework, including:

- the distribution conditions do not make it likely that the consumers who acquire the product are in the target market;
- the nature and number of complaints, complaints data and trends;
- customer feedback and testing;
- number of cancellations and lapses of the product;
- data on product claim ratios, the number, nature and magnitude of claims paid, denied and withdrawn and average claim duration;
- information received by and in relation to distributors;
- feedback from a regulator such as the Australian Securities & Investments Commission ('ASIC') or other interested parties such as the Australian Financial Complaints Authority ('AFCA'), the Insurance Council of Australia and the Code Governance Committee;
- changes to information or circumstances we took into account when developing the TMD, such as changes to our eligibility criteria, a material change to the design or distribution of the product and/or our or the insurer's product disclosure statement, the insurer's underwriting guidelines, pricing, or the number of products sold, including penetration rates; or
- any significant dealings that are inconsistent with the TMD, including those that reasonably suggest that it is no longer reasonable for us to conclude that if the cover were to be issued:
 - to the Trust and its Members in accordance with the distribution conditions, it would be likely that the Trust and its Members are in our target market; or
 - to the Trust and its Members in our target market, it would likely be consistent with the likely objectives, financial situation and needs of the Trust and its Members.

Regulated Persons Reporting

The Insurance Broker who has engaged in retail product distribution conduct in relation to the Product covered by this TMD is required to report the following information to us at arms.pacific@howdengroup.com as soon as practical and in any case within 10 business days of forming a view or becoming aware of the dealing:

- Information on when cover was issued to the Trust and its Members that was ineligible for cover in accordance with our approved eligibility process and reasonable details on the circumstances related to this.
- Information on any significant dealings by you that are inconsistent with the TMD and reasonable details on the circumstances related to this.
- Information on any feedback from a regulator such as ASIC, or other interested parties such as AFCA, related to the product.
- Information on the number of complaints you have received about the product in the month preceding and reasonable details on the circumstances related to the complaint.
- Information as agreed by you in writing with us that would reasonably enable us to promptly identify review triggers or other events and circumstances that have occurred which would reasonably suggest the TMD is no longer appropriate in accordance with s 994B(8) of the Corporations Act.
- Information identified to or by you that would reasonably suggest to you that the TMD is no longer appropriate in accordance with s 994B(8) of the Corporations Act.

Records and reporting

In addition to the reporting by regulated persons mentioned above, each year we will collect and examine data relevant to the review triggers described in this TMD, including data regarding the number and types of complaints received and the number of products issued, renewed, varied or cancelled in the preceding twelve months.

The product issuer of the Early Learning Discretionary Trust ABN 42 616 785 422 is:

Alternative Risk Management Services Pty Ltd

ABN 70 649 963 191 AFS Licence 530893

Level 23, 20 Bond Street,

SYDNEY NSW 2000