

Target Market Determination

Income stream products

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). It sets out the class of customers 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 Challenger Life Company Limited's design and distribution arrangements for the product.

This document is not a Product Disclosure Statement (**PDS**) 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 PDS for Challenger Guaranteed Annuity (Liquid Lifetime) before making a decision whether to buy this product.

Important terms used in this TMD are defined in the Definitions at the end of this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained at challenger.com.au or by calling 13 35 66.

Target Market Summary

This product is likely to be appropriate for an individual who is approaching or is in retirement, looking to exchange a lump sum investment in return for a regular income with the intention to hold the product for their entire lifetime.

This product is not suitable for someone in aged care, or who has knowledge of a major or terminal illness that will likely reduce their life expectancy, or who needs ready access to the lump sum invested outside of regular payments.

Fund and issuer identifiers

Product	Challenger Guaranteed Annuity (Liquid Lifetime) (Liquid Lifetime)
Issuer	Challenger Life Company Limited
Issuer ABN	44 072 486 938
Product SPIN	CHG0005AU
Date approved	30 August 2021
Version	1.0
TMD status	ACTIVE

Description of Target Market

TMD indicator key

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

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

Instructions

In the tables below, customer attributes indicate a description of the likely objectives, financial situation and needs of the class of customers that are considering this product. The TMD indicator, indicates whether a customer meeting the customer attribute is likely to be in the target market for this product.

Generally, a customer is unlikely to be in the target market for the product if **one or more** of their customer attributes correspond to a **red** rating. Where a customer attribute corresponds to an **amber** rating, they may be in the target market depending on their personal circumstances.

Please also refer to the Definitions at the end of this document.

The following customer attributes are relevant for customers who invest in Liquid Lifetime across all product and payment options.

Liquid Lifetime		
Customer attribute	TMD Indicator	Product description including key attributes
Customer's life stage		
Accumulation (aged 18 – 45)		<ul style="list-style-type: none"> You can invest in Liquid Lifetime using your super or personal savings (non-super money) if you are: <ul style="list-style-type: none"> aged 18 and older if you are using non-super money to invest, or aged 60 and older if you are using your super money to invest and have unrestricted access to super. You cannot invest in Liquid Lifetime if you live in a residential aged care facility or if you have an Aged Care Assessment Team/Service (ACAT/ACAS) approval that specifies you are eligible to move into a facility. Liquid Lifetime is a longevity product that is not suitable if you have a major or terminal illness that will likely lead to a materially shorter life expectancy. You cannot invest in Liquid Lifetime via a company, trust or Self-Managed Superannuation Fund (SMSF). If you have a SMSF, however, you can invest via a rollover of the investment amount. If you are using your super money to invest, you must consider the transfer balance cap, which limits the amount that can be used to commence a retirement-phase income stream.
Pre-retirement (aged 45+)		
Retirement (less than age 85)		
Late retirement (aged 85+)		
Aged care or knowledge of major or terminal illness that will likely lead to shortened life expectancy		
Customer attribute	TMD Indicator	Product description including key attributes
Customer's investment objective		
Convert investment amount into a regular income for life		<ul style="list-style-type: none"> Liquid Lifetime is a lifetime annuity that pays you monthly income for life in return for a lump sum investment. Liquid Lifetime is not designed to provide capital growth on the lump sum invested. Your investment is converted into regular income that is paid for your lifetime (and your spouse's lifetime if you choose to include them as part of the investment), regardless of how long you live.
Utilise investment to generate capital growth		
Customer attribute	TMD Indicator	Product description including key attributes
How product fits in to customer's total portfolio		
Partial allocation		<ul style="list-style-type: none"> Liquid Lifetime can be used as part of your retirement or pre-retirement portfolio, providing you with lifelong monthly income in return for a lump sum investment. Liquid Lifetime can work alongside other income sources such as the Age Pension, your savings and super.
Only investment		

The following customer attributes are relevant for customers who select the Flexible Income¹ or the Enhanced Income² option.

Flexible Income and Enhanced Income			
<ul style="list-style-type: none"> The Flexible Income option has a withdrawal value and a guaranteed death benefit for a period based on your life expectancy. The Enhanced Income option provides no withdrawal period or death benefit in return for higher starting payments. 			
Customer attribute	TMD Indicator	TMD Indicator	Product description including key attributes
Customer's income objective	Flexible Income	Enhanced Income	
Income payable for life			<ul style="list-style-type: none"> Liquid Lifetime pays a monthly income for your lifetime (and the rest of your spouse's life if you have them included as part of your Liquid Lifetime) regardless of how long you live. At the start of your Liquid Lifetime you can choose to have your payments: <ul style="list-style-type: none"> indexed in line with changes in the Consumer Price Index (CPI) or partially in line with CPI (whether it be an increase or a decrease) linked to changes in the Reserve Bank of Australia (RBA) cash rate (whether it be an increase or decrease), or fixed (payments that never change) called the "no indexation" option. Your regular payments are not impacted by how investment markets perform though they will vary, based on the payment option you select unless you choose fixed payments. If you invest with super money, regular payments are tax-free. Part of the regular payment may be subject to PAYG tax if investing with non-super money.
Secure income that adjusts according to customer choice and is not linked to investment market performance			<p>Choosing to defer when you start receiving payments</p> <ul style="list-style-type: none"> If you invest with super money, you can choose to defer when you start to receive monthly payments, known as the Deferred payments option. You can defer for a minimum of one year and a maximum of turning 100 years of age. If you die before payments commence, you will not receive any income payments from your Liquid Lifetime. You must consider this in choosing how long to defer payments. <ul style="list-style-type: none"> A lump will also not be payable if you have selected the Flexible Income option and you die after the withdrawal period, or you have selected the Enhanced Income option.
Regular income that is linked to the performance of investment markets			
Customer attribute	TMD Indicator	TMD Indicator	Product description including key attributes
Type of access to lump sum invested required by customer	Flexible Income	Enhanced Income	
Reducing access to lump sum invested in exchange for regular income			<ul style="list-style-type: none"> Liquid Lifetime is designed to be held for life and to provide you with regular income in return for a lump sum investment. <p>Flexible Income option</p> <ul style="list-style-type: none"> The Flexible Income option provides a withdrawal period based on your life expectancy, where you can cancel the annuity and be repaid a lump sum if your circumstances change. The maximum withdrawal value reduces from 100% of the amount invested to zero over the withdrawal period. The Flexible Income option provides a guaranteed death benefit during the withdrawal period, which equals 100% of the amount invested for the first half of your withdrawal period and then reduces over time to zero for the remainder of the withdrawal period. You cannot make partial withdrawals. <p>Enhanced Income option</p> <ul style="list-style-type: none"> Before starting a Liquid Lifetime, you can ask us to remove the withdrawal period and the death benefit in return for higher starting payments, called the Enhanced Income (Immediate payments) option or the Enhanced Income (Deferred payments) option. If you choose this option, your Liquid Lifetime will never have a withdrawal value payable upon voluntary withdrawal or death and is not suitable if you need access to your lump sum invested outside of regular payments under any circumstances.
Benefit payable upon early death			
Ready access to the lump sum invested that can be withdrawn at any time			

¹ Includes Flexible Income (Immediate payments) option and Flexible Income (Deferred payments) option.

² Includes Enhanced Income (Immediate payments) option and Enhanced Income (Deferred payments) option.

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 customers in the target market as described above. The features of this product described in the table above are likely to be suitable for customers with the attributes identified with a green TMD indicator.

Distribution conditions/restrictions

Distribution condition	Permitted distribution channel	Distribution description
Direct (non-advised) retail	Yes	Direct non-advised clients must complete suitability questions on application
Licensed financial adviser	Yes	Customer has been provided with personal advice in relation to this product
Select platform with agreement in place	Yes	Distribution of this product via a platform is only permitted with an appropriate formal administration agreement in place

Review triggers
Unexpected and material uplift in early withdrawals
Material change in tax treatment of product
Significant dealing, as decided by the Issuer, that is not consistent with the TMD
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 affect the product
Australian Prudential Regulation Authority (APRA) intervenes as a result of Challenger Life Company not being able to meet its statutory capital requirements

Mandatory review periods	
Review period	Maximum period for review
Initial review	31 March 2023
Subsequent reviews	1 year 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 design, product availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy.	Within 10 business days following the end of the March and September quarters (note this can be done in two separate quarterly reports if required)	All distributors
Significant dealing outside of target market, under section 994F(6) of the Act. See Definitions for further details.	As soon as practicable but no later than 10 business days after the distributor becomes aware of the significant dealing	All distributors

Definitions

Term	Definition
Customer's life stage	
Accumulation (aged 18 – 45)	In the accumulation phase and/or below age 45
Pre-retirement (aged 45+)	Above the age of 45 but below preservation age
Retirement (less than age 85)	In retirement and less than 85 years of age
Late retirement (aged 85+)	Aged 85 years and older
Aged care or knowledge of a major or terminal illness that will likely lead to shortened life expectancy	<ul style="list-style-type: none"> You live in a residential aged care facility You have an ACAT/ACAS approval that specifies that you are eligible to move into a facility, or You have knowledge of a major or terminal illness that is likely to lead to shortened life expectancy
Customer's investment objective	
Convert investment amount into a regular income for life	The product is designed to generate regular investment income for customers.
Utilise investment to generate capital growth	The product is designed to generate capital return from the growth in the value of the underlying assets over time. The product provides material exposure to growth assets or otherwise seeks an investment return well above the current inflation rate.
How product fits in to customer's total portfolio	
Partial allocation	The customer intends to hold the investment as part of their total investable assets (see definition below).
Only investment	The customer intends to hold the investment as the total amount of their total investable assets (see definition below).
Investable assets	Those assets that the customer has available for investment, excluding the residential home.
Customer's income objective	
Income payable for life	The customer is seeking income for life to address longevity risk: the risk of living longer than expected, resulting in retirement funds being insufficient to finance their lifestyle for their lifetime.
Secure income that adjusts according to customer choice and is not linked to investment market performance	The customer values security and has a low tolerance for payment variability. The customer wants a choice of indexation options to protect their purchasing power that also have a low chance of leading to payments being reduced.
Regular income that is linked to the performance of investment markets	The customer has a moderate tolerance to variability in income and wants the choice to link income payments to adjustments in market indices.
Type of access to lump sum invested required by customer	
Reducing access to lump sum invested in exchange for regular income	The customer is comfortable with restricted access to their lump sum investment amount in exchange for regular income.
Benefit payable upon early death	The customer requires a death benefit payable in the event of death occurring before their life expectancy.
Ready access to lump sum invested that can be withdrawn at any time	The customer needs ready access to the lump sum invested like a savings account or similar.
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 product that is not consistent with the TMD. Neither the Act nor the Australian Securities and Investments Commission (ASIC) defines when a dealing is 'significant' and distributors have discretion to apply its ordinary meaning.</p> <p>Challenger 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:</p> <ul style="list-style-type: none"> 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 customer (or class of customer). <p>In each case, the distributor should have regard to 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 customer).</p>