

# Super Target Market Determination (TMD) Risk only Superannuation Product

Effective date: 13 May 2024

Issuer: HTFS Nominees Pty Limited ABN 78 000 880 553 AFSL 232500

## 1. About this document

This target market determination (**TMD**) contains information on the superannuation product that is distributed and marketed as ClearView ClearChoice Super issued by HTFS Nominees Pty Ltd (**HTFS**) ABN 78 000 880 553 AFSL 232500 (the 'Trustee') as trustee of the HUB24 Super Fund (**Fund**).

This TMD provides consumers, distributors and staff with an understanding of the class of consumers for which this product has been designed, having regard to the objectives, financial situation and needs of the target market.

This document is not a Product Disclosure Statement (**PDS**), is not to be treated as a full summary of the product's terms and conditions, does not take into account any person's individual financial objectives, situation and needs and is not intended to be considered as financial advice. Consumers must refer to the PDS and any supplementary documents when making a decision about this product.

Product Disclosure Statement to which this target market determination applies

This TMD relates to the version of the risk-only superannuation product that is distributed and marketed as ClearView ClearChoice Super (**ClearChoice Super**) referred to in the ClearView ClearChoice Product Disclosure Statement and Policy Document.

In ClearChoice Super, the premiums for the underlying insurance product are funded by contributions or rollovers from another super fund, made to the risk-only superannuation product.

This product which is issued by the Trustee of the Fund is used to gain access to life insurance products issued by ClearView Life Assurance Limited ABN 12 000 021 581 (**ClearView**) to the Trustee.

This TMD (which relates to the superannuation product) should be read in conjunction with the combined ClearView ClearChoice TMD that has been issued by ClearView for standalone insurance.

Previous target market determination review date:  
13 June 2023.

## 2. Class of consumers that constitutes the target market

The target market for the product comprises of persons who:

- want to obtain insurance cover within the superannuation environment including Life cover, TPD cover and Income Protection cover including accident-only cover
- want to pay insurance premiums funded by personal contributions, spouse contributions or by rollover from another superannuation fund
- will have sufficient superannuation balance or contributions to meet retirement objectives after premium payments have been made
- can afford sufficient levels of cover to allow for potential taxation consequences at claim
- understand and accept the additional risk of needing to meet a Superannuation Industry (Supervision) Act 1993 (**SIS**) condition of release.

### Excluded class of consumers

ClearView ClearChoice Super is not suitable for a person:

- seeking a superannuation product with an investment component
- who wishes to fund their insurance premiums with employer contributions
- who is not comfortable with the additional risk of needing to meet a SIS condition of release
- wishing to nominate a beneficiary that is not a financial dependant under superannuation law or their estate
- intending to own cover through a business

For the insurance target market criteria, a person should refer to the relevant combined ClearView ClearChoice cover TMD issued by ClearView, which can be found at [clearview.com.au/tmd](http://clearview.com.au/tmd).

### Product description

The product is a superannuation interest issued by HTFS as trustee of the HUB24 Super Fund. It provides eligible persons the ability to obtain insurance cover within a superannuation environment and is funded from superannuation contributions or rollovers.

The underlying policy is a contract of insurance between ClearView and the Trustee and does not govern a person's membership of the Fund.

Membership of the Fund is governed by the Fund's Trust Deed and superannuation laws. Any benefits paid under the life insurance policy issued by ClearView to the Trustee will be paid to the Trustee. Premiums paid for the policy are paid by the Trustee after it receives a sufficient contribution from, or a rollover in respect of, a member.

Any entitlements to:

- be paid a benefit received by the Trustee under the policy, and
- pay contributions or rollover amounts to the Trustee for the Trustee to pay premiums to ClearView for the policy; is subject to any restrictions or limitations that may apply under the Fund's trust deed or under superannuation laws.

### Key product attributes

#### Fees and costs

ClearView ClearChoice Super provides premiums that are dependent on, among other factors, the type of insurance and any options selected, age, sex, smoking status, health, pastimes, occupation, level of insurance, the premium type and the frequency of premium payments.

#### Premium types

ClearView ClearChoice Super offers two premium types for consideration:

- **Variable age-stepped premium:** Where there is a preference for a lower up-front cost or there is uncertainty as to how long cover will be held. In addition, there is capacity to meet increasing premiums over time due to age.
- **Variable premium:** Where cover is to be held for a duration such that variable premiums are expected to result in a lower cost than variable age-stepped premiums. The customer should be comfortable with the higher up-front cost particularly in the event of early policy termination.

Premiums, regardless of premium type, are not guaranteed and may be increased or decreased in the future in line with the policy conditions. Please refer to the 'Premiums and Other Costs' section of the ClearView ClearChoice Product Disclosure Statement and Policy Document for more information.

### Tax

A person who becomes a member of the Fund may be eligible to receive a range of tax concessions subject to eligibility. Further information and updated eligibility is available from [www.ato.gov.au](http://www.ato.gov.au).

### Insurance

ClearView ClearChoice Super offers access to a range of insurance options including:

- Life Cover
- Total & Permanent Disablement (TPD) Cover
- Income Protection (IP) Cover, including a range of waiting periods and benefit payment periods.

The table below sets out the class of consumer for each insurance attribute.

Insurance key attributes	Target market suitability
<b>Life Cover including Terminal Illness Cover</b>	This may be suitable for a person who is looking to obtain insurance cover in the event of death or terminal illness due to sickness or injury.  The combined ClearView ClearChoice TMD should be referred to before making any decision on this insurance cover.
<b>Accidental Death Cover</b>	This may be suitable for a person who is looking to obtain insurance cover in the event of death as a result of an injury. The combined ClearView ClearChoice TMD should be referred to before making any decision on this insurance cover.

### Insurance key attributes

### Target market suitability

#### **Total and Permanent Disablement (TPD) Cover**

This may be suitable for a person who is looking to obtain insurance cover in the event of total and permanent disability due to sickness or injury.

The combined ClearView ClearChoice TMD should be referred to before making any decision on this insurance cover.

#### **Accidental Total and Permanent Disability Cover**

This may be suitable for a person who is looking to obtain insurance cover in the event of total and permanent disability as a result of an injury.

The combined ClearView ClearChoice TMD should be referred to before making any decision on this insurance cover.

#### **Income Protection (IP) Cover**

This may be suitable for a person who is looking to obtain insurance cover in the event of disability due to sickness or injury.

The combined ClearView ClearChoice TMD should be referred to before making any decision on this insurance cover.

#### **Accidental Income Protection Cover**

This may be suitable for a person who is looking to obtain insurance cover in the event of disability as the result of an injury.

The combined ClearView ClearChoice TMD should be referred to before making any decision on this insurance cover.

**Note:** Insurance may not be suitable for certain excluded occupations. You should refer to the PDS for further detail.

## Consistency between target market and the product

The Trustee considers that the product is likely to be consistent with the likely objectives, financial situation and needs of consumers within the target market because:

- there is a range of insurance options to cater for a broad range of insurance needs (including type and level of cover); and
- the fees, costs and premiums associated with the ClearView ClearChoice Super product are consistent with market rates for the applicable covers.

## 3. How this product is to be distributed

### Distribution channels

ClearView ClearChoice Super is distributed through approved financial dealer groups and their advisers. Also, the superannuation product is issued only to a consumer whose application for insurance has been accepted by ClearView.

### Distribution conditions

The product should only be distributed under the following circumstances:

- Where the prospective member is resident in Australia and is eligible to contribute to their superannuation account; and
- Where a member is applying for insurance cover, they must:
  - meet the age, employment and residency requirements outlined in the PDS; and
  - meet underwriting requirements; and
  - be in an eligible occupation category for the type of insurance cover being applied for and
  - fall within the target market unless the distributor provides personal advice and has concluded that it is in the best interest of the consumer to acquire the product despite the fact they are not within the target market.

Distributors must also ensure that they comply with all regulatory provisions relating to financial products including but not limited to the provision of financial advice, Anti-Hawking Provisions and other legislative requirements within the Corporations Act and other relevant law.

Apart from eligibility to join the Fund through an employer group, the Trustee has not identified any circumstances where distribution of the product would be restricted if the above conditions are met.

## Adequacy of distribution conditions and restrictions

The Trustee has determined that the distribution conditions and restrictions will make it likely that customers who purchase the product are in the class of customers for which it has been designed. The Trustee considers that the distribution conditions and restrictions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

In making this determination, the Trustee has had particular regard to the following:

- a consumer must be in the target market unless they have received personal advice from an adviser in relation to the product; and
- the superannuation product will be issued to a consumer only if the consumer's application for insurance has been accepted by the insurer.

A consumer can only become a member through an application form obtained through a financial adviser.

## 4. Reviewing this target market determination

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

### Periodic reviews

- 3 years from the effective date

### Review triggers or events

Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but is not limited to):

- significant finding from a Member Outcomes Assessment relating to product design or distribution
- a material change to the design or distribution of the product, including related documentation
- the occurrence of a significant dealing
- external events such as adverse media coverage which would significantly impact the sustainability of the Fund or regulatory changes that significantly affect the product or the distribution of the product
- significant changes in metrics, including, but not limited to, complaints, sales volumes or an increase in cancellation rates during the cooling off period
- if the TMD for the underlying insurance product is varied, us forming a view that the product is no longer consistent with the likely objectives, needs and financial situation of the retail clients in the target market
- product performance being materially inconsistent with our expectations
- product design changes which we consider to be material and impact the target market
- complaints which in our view indicate a material distribution method or product design that is no longer serving the intended target market
- significant regulator feedback and or the use of a Regulator's Product Intervention Powers in relation to the product.

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 have the obligation to report the following information to us in relation to this TMD.

### Complaints

Distributors must record and report all complaints that relate to the product or its distribution. The record should include the substance of complaints in relation to the product covered by this TMD. Where a complaint relating to the product and/or its distribution is received, the distributor must report this complaint information to the issuer at six monthly intervals (end of March and September). This will include written details of the complaints.

### Significant dealings

Distributors must report if they become aware of a significant dealing in relation to this TMD within 10 business days.

Reporting for complaints and significant dealings should be directed to the issuer at:

Complaints Manager  
ClearView  
Reply paid 4232  
SYDNEY NSW 2001 or via email to  
**complaints@clearview.com.au**