



**CLARENCE
PROPERTY**

4 DECEMBER 2025

TARGET MARKET DETERMINATION

CLARENCE PROPERTY DIVERSIFIED FUND

A stapled entity comprising the following funds, referred to hereafter as CPDF:

Clarence Property Diversified Fund ARSN 095 611 804

Epiq Lennox Property Trust ARSN 626 201 974

Updated 4 December 2025

Clarence Property Corporation Limited ABN 67 094 710 942 AFSL 230212

TARGET MARKET DETERMINATION

INTRODUCTION

This Target Market Determination (**TMD**) is required by section 994B of the Corporations Act 2001 (Cth) (the **Act**). It describes the consumers that makes up the target market of Clarence Property Diversified Fund (**CPDF** or the **Fund**) and sets out some other matters relevant to CPDF's distribution and ongoing review (specifically, distribution conditions, review triggers and periods, and reporting requirements) of the TMD.

This document is issued by Clarence Property Corporation Limited and forms part of its design and distribution arrangements for CPDF but does not form part of the Product Disclosure Statement (**PDS**) for the Fund and is not a complete summary of the terms and features of CPDF.

Important terms in this TMD are defined in the Definitions section on page 9. The information in this document does not consider any person's individual investment objectives, financial situation or needs. Consumers should read the Fund PDS before making any decision regarding investing in CPDF (the **Product**). The PDS can be obtained from our website www.clarenceproperty.com.au.

TARGET MARKET SUMMARY

This product is likely to be appropriate for a consumer who:

- is seeking to invest in an actively managed portfolio of diversified Australian income-producing commercial property (with some exposure to property development projects) located predominantly in Queensland and New South Wales, managed by experienced property managers;
- is seeking monthly income and the potential for capital growth;
- has a medium to high risk and return profile for that portion of their portfolio, and is able to tolerate and understand fluctuations in the property cycle and the risk of capital and rental loss;
- is intending to use the Fund as a Satellite or Minor allocation;
- is an Australian resident;
- has sufficient liquid funds (minimum \$55,000) to invest directly, through an online application;
- understands the most appropriate investment timeframe is 5 years or more; and
- understands the investment is illiquid.

FUND AND ISSUER IDENTIFIERS

Issuer	Clarence Property Corporation Ltd (referred to as 'we', 'us' or 'our')
Issuer ACN	094 710 942
Issuer AFSL	230212
TMD contact details	enquiry@clarenceproperty.com.au
Fund	Clarence Property Diversified Fund is a stapled entity comprising Clarence Property Diversified Fund ARSN 095 611 804 and Epiq Lennox Property Trust ARSN 626 201 974, collectively referred to as Clarence Property Diversified Fund (CPDF)
TMD Issue Date	4 December 2025
TMD Version	6
Distribution status of the Fund	Available

SECTION 1 – DESCRIPTION OF TARGET MARKET

TMD indicator key

The table below describes the likely objectives, financial situation and needs of consumers for whom the product is likely to be appropriate, and indicates whether or not they are likely to fall within CPDF's target market. The consumer attributes for which the product is likely to be appropriate have been assessed using a red and green rating methodology; ● In target market, ● Not considered in target market

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 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.

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 the features of this product in Column 3 of the table below are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (for example, with an intended product use of minor allocation). 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 balanced or moderately diversified portfolio with a minor allocation to growth assets. In this case, a product with a High risk/return profile may be consistent with the consumer's objectives for that minor allocation notwithstanding the risk/return profile of the consumer as a whole is Medium.

CONSUMER ATTRIBUTES	TMD INDICATOR	CPDF TARGET MARKET
CONSUMER'S INVESTMENT OBJECTIVE		
Income distribution	● In target market	CPDF is designed for consumers looking for regular income by investing in a diversified property trust which holds quality income-generating Australian real property assets (with some exposure to property development projects) which are actively managed. CPDF generates regular income and aims to pay distributions to consumers monthly and provide the potential for modest capital growth over the long term. The Fund is designed and expected to have modest capital growth over the recommended investment horizon of at least five years. The value of an investment in the Fund is subject to movements in the value of the real property owned by the Fund. In addition, the Fund is a geared investment, which increases the potential for capital losses and gains. The Fund is higher risk than cash or fixed income securities and is not suitable for an investor who cannot accept any loss of capital.
Capital growth	● In target market	
Capital preservation	● Not considered in target market	
CONSUMER'S INTENDED PRODUCT USE (% OF INVESTABLE ASSETS)		
Satellite allocation (up to 10% of Investable Assets)	● In target market	CPDF is a diversified property trust which invests in a portfolio of income-producing properties in different property sectors including Convenience Retail, Office, Logistics, Medical, Childcare and Property Development, predominantly across Northern NSW and South-East Queensland. The Fund may also invest in cash, and unlisted and listed property securities. The Target Market includes consumers seeking to invest in CPDF as part of a broader portfolio.
Minor allocation (up to 25% of Investable Assets)	● In target market	
Core component (up to 50% of Investable Assets)	● Not considered in target market	

CONSUMER ATTRIBUTES	TMD INDICATOR	CPDF TARGET MARKET
Major allocation (up to 75% of Investable Assets)	● Not considered in target market	The portfolio diversification of CPDF is low as it is a single asset class (real property) in a single country (Australia) over a moderate number of properties.
Solution/Standalone (up to 100% of Investable Assets)	● Not considered in target market	While the investment objective of CPDF may align with a consumer's overall portfolio objectives, it does not come without capital and income risks. In extreme circumstances, this may result in capital loss or the suspension of or no income distributions. Consumers should seek to spread this risk across an appropriate portfolio of investments.
CONSUMER'S INTENDED INVESTMENT TIMEFRAME		
Minimum investment timeframe	● More than 5 years	CPDF is designed for consumers who are looking to make a long-term investment of at least 5 years or more. In considering their minimum investment timeframe, consumers should note CPDF is an illiquid fund with no current consumer withdrawal rights, and no liquidity or redemption facilities in operation. Refer 'Consumer's Need to Access Capital' below.
CONSUMER'S RISK (ABILITY TO BEAR LOSS) AND RETURN PROFILE		
Very low risk	● Not considered in target market	CPDF primarily invests in direct commercial property intended to generate regular income, has some exposure to property development projects and leverage risk, and may also invest in cash and unlisted and listed property securities. CPDF aims to provide investors with monthly income distributions and the potential for capital growth over the long term. However, there are risks involved in the Fund, which may include: - the value of the Fund's properties may decline, which may result in a fall in the value of an investment in the Fund; - if tenants of CPDF properties fail to pay rent or break their lease, this could result in a decrease in rental income and possible capital loss for CPDF; - if unforeseen structural issues occur in CPDF properties requiring significant capital expenditure, this may result in a decrease in income distributions; - if delays occur in obtaining regulatory approvals for CPDF's development activities, this may reduce CPDF's distributable income; and - the Fund may borrow against the value of its assets, which may increase potential capital losses and gains. Using the Standard Risk Measure (SRM), which measures risk based on the possible number of annual negative periods over a 20-year period, the Fund may experience up to four negative returns over a 20 year period, which places the Fund at SRM 3 to 5 – Medium risk. Consumers should recognise this is not a comprehensive assessment of risk. For example, it does not take into account the size of a possible negative return, return volatility, the fact that CPDF is an illiquid fund with no consumer rights to withdrawals, or
Low risk	● Not considered in target market	
Medium risk	● In target market	
High risk	● In target market	

CONSUMER ATTRIBUTES	TMD INDICATOR	CPDF TARGET MARKET
Very high risk	● In target market	the risk that returns may be positive but not meet a consumer's objectives, financial situation and needs.
Extremely high risk	● Not considered in target market	For those reasons, consumers must consider their individual investment goals and risk profile. To assist in that, consumers should read the Risks section of the Fund's PDS which supplements the SRM. Taking into account the factors laid out in our PDS, CPDF is considered a medium risk investment. Consumers with a very low to low risk profile do not fall within CPDF's target market.

CONSUMER'S NEED TO ACCESS CAPITAL

At consumer's request	● Not considered in target market	CPDF is an illiquid fund with no consumer withdrawal rights.
At issuer's discretion	● In target market	The Fund is not suitable for investors who require ready access to their capital. Unitholders have the right to privately sell or transfer their investment to third parties in accordance with the CPDF Constitution. The Issuer does not operate any formal market for sellers and buyers of Fund units. The Issuer may offer redemption facilities from time to time at its discretion. There is currently no intention for the Issuer to offer the ability for consumers to redeem any units of the Fund.

SECTION 2 - DISTRIBUTION CONDITIONS / RESTRICTIONS

DISTRIBUTION CHANNEL	
Direct (non-intermediated) retail and wholesale consumer	The minimum initial investment is 50,000 units accompanied by a completed on-line Application Form which is accessible via www.clarenceproperty.com.au. This Product is designed to be distributed only via: - Clarence Property contact centres by calling 1300 853 069; - Clarence Property's website at www.clarenceproperty.com.au; or - Clarence Property offices in Robina Qld, Brisbane Qld or Lennox Head NSW. Only select Clarence Property representatives can promote and distribute this Product as they understand the target market the Product has been designed for, have been trained by Clarence Property in the relevant target market criteria and have the appropriate levels of authority. Regular design and distribution obligations training is delivered to all such representatives. Some of the key acceptance criteria relating to this Target Market Determination include: - Level of investment experience; - Level of investment risk acceptance; - Prior investment history; and - Liquidity requirements and understanding of the illiquid nature of CPDF. Clarence Property monitors those consumers from whom applications are received to ensure they fall within the target market, and to assess whether distribution

	arrangements are adequate and appropriately identify consumers who may or may not fall within the target market. Clarence Property considers the distribution conditions will make it more likely that consumers who acquire Units in CPDF are in the target market because: - the Fund's advertisements and website content are directed towards consumers in the Fund's target market by describing the target market and characteristics of the Fund; - all advertisements and promotional material undergo a compliance check to ensure the information in that material aligns with the target market and would make it unlikely for consumers outside the target market to invest in CPDF; - the online application form for CPDF includes filtering questions and alerts relevant to the distribution conditions which require consumers to speak with Clarence Property in order to proceed with their application. Select Clarence Property representatives contact applicants prior to their investment being finalised.
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SECTION 3 - REVIEW TRIGGERS AND REVIEW PERIODS

We will review this TMD in the event any of the below circumstances occur, which would indicate this current TMD is no longer appropriate.

REVIEW TRIGGERS (required by section 994B(5)(d) of the *Corporations Act 2001 (Cth)*)

Significant product change	If we make a significant change to CPDF including Fund objectives, fees and charges, distribution channels, consumer satisfaction and acceptance criteria.
Regulatory change	If a change in law or other regulatory requirement materially affecting CPDF commences, unless this TMD has already been reviewed in anticipation of that change.
Fund performance	If CPDF has significantly and consistently not achieved its investment objectives.
Significant breach	If we commit a significant breach of financial services law where the breach relates to the design or distribution of CPDF.
Significant dealings outside the TMD	If we identify significant dealings outside this TMD.
Complaints from consumers	If we receive a significant and unexpected number of complaints, in respect of one or more calendar quarters, in relation to CPDF's design (including its features, terms or conditions) or the manner in which CPDF is distributed.
Notification from ASIC	If we receive a notification from ASIC raising serious concerns regarding the design or distribution of CPDF.

MANDATORY REVIEW PERIODS

Initial review	N/A – initial review completed
Subsequent review	1 year and 3 months from the day the previous review has finished.

SECTION 4 - REPORTING REQUIREMENTS

REPORTING REQUIREMENT	REPORTING PERIOD	WHICH DISTRIBUTORS THIS REQUIREMENT APPLIES TO
Complaints (as defined in section 994A(1) of the <i>Corporations Act</i>) received during a calendar quarter relating to Fund design or Fund distribution.	Clarence Property takes all complaints seriously and has a complaints procedure in place to ensure every complaint received is handled in a timely and efficient manner. As all distributors are Clarence Property representatives, complaints will be addressed in accordance with Clarence Property's complaints procedure.	All distributors
Significant dealing outside of target market, under section 994F(6) of the <i>Corporations Act</i> .	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	All distributors

DEFINITIONS

The following definitions apply to terms used in this Target Market Determination.

TERM	DEFINITION
Consumer's investment objective	
Capital Growth	The consumer seeks to invest in a product designed or expected to generate capital growth over the investment timeframe. The consumer prefers exposure to growth assets (such as shares or property).
Capital Preservation	The consumer seeks to invest in a product designed or expected to have low volatility and minimise capital loss. The consumer prefers exposure to defensive assets that are generally lower in risk and less volatile than growth investments (this may include cash or fixed income securities).
Income Distribution	The consumer seeks to invest in a product designed or expected to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (such as commercial rental property, dividend-yielding equities, fixed income securities and money market instruments).
Consumer's intended product use (% of Investable Assets)	
Solution/Standalone (up to 100%)	The consumer may hold the investment as up to 100% of their total <i>investable assets</i> . The consumer is likely to seek a product with <i>very high</i> portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>high</i> portfolio diversification.
Core Component (up to 50%)	The consumer may hold the investment as up to 50% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>medium</i> portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total <i>investable assets</i> . The consumer is likely to seek a product with at least <i>low</i> portfolio diversification.
Satellite allocation (up to 10%)	The consumer may hold the investment as up to 10% of their total <i>investable assets</i> . The consumer may seek a product with <i>very low</i> portfolio diversification. Products classified as <i>extremely high</i> risk are likely to meet this category only.
<i>Investable Assets</i>	Those assets the investor has available for investment, excluding their residential home and money needed for daily living expenses such as bills and mortgage repayments.
Portfolio diversification (for completing the key product attribute section of consumer's intended product use)	
Very low	The product provides exposure to a single asset (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).

TERM	DEFINITION
Low	The product provides exposure to a small number of holdings (for example, fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, a single major commodity (e.g. gold) or equities from a single emerging market economy).
Medium	The product provides exposure to a moderate number of holdings (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).
High	The product provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asset classes, sectors or geographic markets (for example, global equities).
Very High	The product provides exposure to a large number of holdings across a broad range of asset classes, sectors <u>and</u> geographic markets with limited correlation to each other.
Consumer's intended investment timeframe	
Minimum	The minimum suggested timeframe for holding the product. Typically, this is the rolling period over which the investment objective of the product is likely to be achieved.
Consumer's Risk (ability to bear loss) and Return profile	
This TMD uses the Standard Risk Measure (SRM) to estimate the likely number of negative annual returns for this product over a 20 year period, using the guidance and methodology outlined in the Standard Risk Measure Guidance Paper For Trustees: see https://www.fsc.org.au/web-page-resources/fsc-guidance-notes/2316-fsc-qn29. However, 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 (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some products may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating. A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.	
Low	For the relevant part of the consumer's portfolio, the consumer: • has a conservative or low risk appetite, • seeks to minimise volatility and 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. The consumer typically prefers stable, defensive assets (such as cash).
Medium	For the relevant part of the consumer's portfolio, the consumer: • has a moderate or medium risk appetite, • seeks low volatility and potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)), and • is comfortable with a moderate target return profile. The consumer typically prefers defensive assets (for example, fixed income).
High	For the relevant part of the consumer's portfolio, the consumer: • has a high risk appetite, • can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)), and • seeks high returns (typically over a medium or long timeframe). The consumer typically prefers growth assets (for example, shares).
Very High	For the relevant part of the consumer's portfolio, the consumer: • has a very high risk appetite, • can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)), and • seeks to maximise returns (typically over a medium or long timeframe). The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).
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 timeframe). 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).
Consumer's need to access capital	
This consumer attribute addresses the likely period of time between the making of a request for redemption/withdrawal (or access to investment proceeds more generally) and the receipt of proceeds from this request under ordinary circumstances. CPDF does not currently offer any redemption or withdrawal facilities. Units in CPDF may be sold by unitholders to buyer third parties, but no formal market is operated by the Issuer.	

TERM	DEFINITION
Distributor reporting	
Significant dealings	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 ASIC defines when a dealing is 'significant' and distributors have discretion to apply its ordinary meaning. 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. Dealings outside this TMD may be significant because: • 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 consumer (or class of consumer). In each case, the Issuer will have regard to: • the nature and risk profile of the product (which may be indicated by the product's risk rating or access to capital 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 ratings attributed to the consumer). Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if: • it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the quarter, • the consumer's intended product use is solution/standalone, • the consumer's intended product use is core component or higher and the consumer's risk/return profile is low, or • the relevant product has a green rating for consumers seeking extremely high risk/return.