

Target Market Determination



Product	LoanOne Green Residential Alt Prime & Green Residential Alt Near Prime
Mortgage Manager	LoanOne Pty Ltd ACN: 54 161 283 147; ACL: 501182
Effective date of TMD	5 October 2021
TMD version	Version 1

About this document

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 LoanOne Pty Ltd ACN 54 161 283 (**LoanOne**) design and distribution arrangements for the product.

This document 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.

Description of the target market

The above products are Full Doc loans secured upon a completed residential property. The products are available for purchase, refinance, and equity release, at a term of up to 30 years at variable interest rates. Repayments may be principal and interest or interest only up to 5 years. The target market of the product includes Individuals, Companies and Trusts.

The criteria for acceptable Individual Applicants for the product is:

- Australian or New Zealand resident; and
- Minimum age of borrower is 18.

The criteria for acceptable Company Applicants for the product is:

- The company must have a valid ACN;
- The details of all shareholders with more than 25% shareholding in the company (if not a director) must be collected;
- Maximum of 4 guarantors is acceptable;
- Guarantors must be natural persons; and
- Living expenses of the guarantors must be included.

The criteria for acceptable Trust Applicants for the product is:

- Loans to a trust must be in the name of the trustee in its/their own right and also in its/their capacity as trustee;
- Discretionary, Unit or Family trusts permitted; and
- Full trust deed to be provided (stamped & signed).

Objectives, financial situation, and needs

This product is designed for consumers who are:

- Seeking to purchase residential property within Australia for either owner occupation or investment purposes;
- Seeking to refinance residential property within Australia for either owner occupation or investment purposes;
- Seeking to consolidate debt (ie. Credit cards, personal loans, business loans, etc.);
- Seeking to make non-structural home improvements;
- Seeking to make and "Off the Plan" purchase;
- Seeking to get a business loan;

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- Seeking to acquire non-real estate investments (shares, managed funds, etc.);
- Seeking finance for general consumer purposes (ie. Car, holiday, etc.);
- For the LoanOne Green Residential Alt Prime & Green Residential Alt Near Prime, the payment of taxation liability is offered on an exception basis; and
- If the customer chose a variable rate they would be seeking flexibility to make extra repayments without a fee; seeking flexibility to redraw funds as required; seeking additional features on their home loan (ie. Offset account); and
- The customer would need to meet LoanOne's credit assessment and AML/CTF requirements.

Ineligible consumers

Applicants will not be considered from the following:

- Minors;
- Companies or company trustee's involving disqualified directors;
- Companies and/or individuals where a significant portion of their income is derived from the purchase / development / re-sale of property, unless to purchase or refinance their owner-occupied residence (cash out limited to \$10,000);
- Bankrupts discharged < 3 years ago;
- Applicants under external administration;
- Superannuation funds (either applicant or security provider);
- Public companies;
- Owner Builders;
- Limited Liability Companies;
- Associations;
- Churches;
- Clubs; and
- Borrowers of Convenience.

Consistency between target market and the product

This product is likely to be consistent with the likely objectives, financial situations and needs of the customers within the target market as it is a simple loan construct to understand with variable interest rates only.

Repayments may be principal and interest or interest only up to 5 years. To be eligible to purchase this product, requirements must be met in relation to:

- Employment; and
- Income,

Which would mean that, without exceptional circumstances, the Borrowers will be able to meet their repayment obligations.

Product description and key attributes

The product is offered in two variations:

- LoanOne Green Residential Alt Prime;
- LoanOne Green Residential Alt Near Prime

The main difference between the two is that LoanOne Green Residential Alt Near Prime accepts clients with some adverse credit history, higher loan amounts, more postcodes, high density properties, and businesses which have been operating for less than 12 months.

Information about the products' specifications is set out below:

- The purpose of the loans for both product is purchase, refinance or equity release of owner occupied or investment property;

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- The cash out for the LoanOne Green Residential Alt Prime product is up to \$250,000.
- The repayment options for both product include Principal and Interest or Interest Only (max 5 years);
- The repayment methods include Direct Debit, BPAY and Pay anyone;
- The loan term is up to 30 years for both products;
- The Offset Facility allows for 100% redraw;
- The products facilitate for up to 5 loan splits; and
- The minimum loan size is \$50,000.

How this product is to be distributed

Distribution Conditions

The main distribution channel for this product is through third party distributors, being mortgage brokers.

The distribution conditions which Mortgage brokers must comply with include ensuring that potential customers within the target market meet the eligibility requirements for the product.

In order to distribute this product to a potential customer within the target market, the customer must not:

1. Fall into a class of customers set out under the above heading, “Classes of consumers for whom the product is clearly unsuitable”; or
2. Provide an unacceptable security type.

Further eligibility requirements to purchase this product include:

1. Employment requirements of the target market; and
2. Income requirements of the target market.

Adequacy of distribution conditions and restrictions

LoanOne monitors the quality and content of applications received from its Mortgage brokers for trends and patterns of unacceptable practices or just poor quality and/or incomplete loan applications. Feedback is given, if and when needed. LoanOne distributing Mortgage Brokers are the party to agreements that contain commission or fee claw back clauses for unacceptable loans, poor performing loans, fraud and AML/CTF issues amongst other criteria. LoanOne also reserves the right in these agreements to terminate Brokers for any reason on two weeks’ notice.

Target Market Determination Reviews

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

Initial review	Within the 12 months of the effective date.
Periodic reviews	At least every three years from the initial review.
Review triggers or events	<p>The review triggers that would reasonably suggest that the TMD is no longer appropriate include:</p> <ul style="list-style-type: none">• A significant dealing of the product to consumers outside the target market occurs;• A significant number of complaints or dissatisfaction by the customers in relation to Mortgage brokers;• A significant number of complaints is received from customers in relation to their purchase or use of the product that reasonably suggests that the TMD is no longer appropriate;• A material change to the product or the terms and conditions of the product occurs which would cause the TMD to no longer be appropriate;

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- Hindsight reviews indicate that the product has been sold to classes of customers for whom the product is clearly unsuitable;
- Material changes to the regulatory environment or relevant legislation;
- The extent and nature of any negative feedback from Mortgage brokers indicating that they are unable to sell the product to eligible customers within the target market;
- The extent and nature of any negative feedback from Borrowers indicating that they are dissatisfied with the products;
- High rates of default by the customers in the target market; and
- Customers of the target market seeking to switch to other loan products.

Reporting Requirements

The following information must be provided to LoanOne by distributors who engage in retail product distribution conduct in relation to this product:

<u>Type of information</u>	<u>Description</u>	<u>Reporting period</u>
Customers complaints	Number of complaints received in relation to the product	Every 6 months
Broker Complaints	The extent and the nature of the complaints received from brokers about difficulty in selling to the targets market	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (ie. Why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Application details	The broker is responsible to sight the original documents and make reasonable enquiries as to their authenticity to ensure that eligible customers are purchasing the product.	As soon as practicable
Dealings outside of the target market	To the extent a broker is aware of dealings outside of the target market, these should be reported to LoanOne, including the reason why acquisition is outside of target market	Within 10 business days
Customer payment default	Customers within the target market are unable to meet their loan repayments	As soon as practicable
Customer's dissatisfaction with the product	The customer inquiring to change the product or making complaints about it	Every 6 months