

# Target Market Determination (TMD)

## For Real Equity Credit Facility

Effective from 5 October 2021

### About this document

This TMD applies to the Real Equity Credit Facility issued by Newcastle Permanent Building Society (ACN 087 651 992, AFSL/Australian Credit Licence 238273) (the **Issuer**).

The purpose of this TMD is to describe who a product is appropriate for (the target market), and any conditions around how the product can be distributed to customers.

This TMD is not intended to provide any financial product advice, and does not take into account any individual customer's objectives, financial situation or needs. Examples used in this TMD are illustrative only, and are not intended to be exhaustive.

This TMD does not replace the Terms and Conditions applicable to this product. Before deciding to acquire a product from Newcastle Permanent, you should consider the relevant Terms and Conditions, which are available at any branch or by calling 13 19 87.

### Who is this product suitable for?

The Real Equity Credit Facility is a basic revolving line of credit designed for customers to access the equity in their property. They may wish to use this credit for the purchase of goods and services, to manage their cash flow or for investment purposes.

### This loan is targeted at customers who:

- Seek a variable interest rate only charged on the funds drawn
- Seek the ability to combine their loan, savings and transaction accounts
- Want the flexibility to draw or repay borrowings as often as they like, up to their approved credit limit
- Value the flexibility to be able to access their money whenever and wherever they are, via a range of channels
- Who wish to manage their own cashflow with no set repayments or loan term applying

### Eligible borrowers must:

- Be 18 years of age or over
- Be permanent residents of Australia or New Zealand
- Have a demonstrated ability to afford to repay the loan
- Be able to provide security for the loan using either their primary residence or an investment property.

This product is likely to be consistent with the objectives, financial situation and needs of the class of consumers in the target market. This is based on an assessment of the key terms, features and attributes of the product and a determination that these are consistent with the identified class of consumers.

### **The Real Equity Credit Facility is generally not suitable for customers who:**

- Want the certainty of a fixed interest rate
- Seek to have no monthly account keeping fees
- Do not have sufficient equity in residential equity to support the loan
- Cannot demonstrate an ability to afford repayment of the loan without financial hardship
- Seek a loan for business/commercial purposes
- Seek package benefits to access special discounts on other Newcastle Permanent products and services

### **How is this product distributed?**

This product is designed to be distributed through:

- Newcastle Permanent Lenders (in person, via phone or video conferencing)
- Mortgage Brokers (in person, via phone or video conferencing) that are authorised credit representatives of the aggregators listed below.

This product is approved to be distributed by Newcastle Permanent and the following aggregators (the Distributors):

- AFG
- Connective
- Mortgage Choice
- Plan

### **What conditions or restrictions are there on the distribution of this product?**

This product is designed to be distributed by accredited lenders who are aware of the product and its attributes.

Distribution of this product is to follow from a conversation with the customer on their lending needs, and whether these appear to be met by the product's key attributes. In addition, the application questions collect customer financial details and the customer must provide proof of income.

Potential customers may also be referred to the website via links from third-party comparison websites that Newcastle Permanent has partnered with. These customers are able to apply for the product in the same manner as described above (i.e. no different distribution conditions apply).

Newcastle Permanent has assessed the distribution conditions and restrictions will make it likely customers acquiring the product are in the target market. Newcastle Permanent has considered the distribution conditions and restrictions are appropriate and will facilitate distribution of the product to be directed towards the class of customer for whom the product has been designed.

### **What monitoring will be undertaken on this product?**

Distributors will provide reporting on the below areas on a quarterly basis as agreed with Newcastle Permanent.

Distributors of this product will need to provide reporting to Newcastle Permanent on the following to determine whether the TMD and product continues to be appropriate:

- Information about the nature and number of complaints about the product
- Information about sales of the product that have occurred outside of this TMD

Additionally, this product will be subject to Newcastle Permanent reporting and monitoring on:

- Sales performance and TMD adherence on a monthly basis,
- Customer complaints and remediation, on a monthly basis,
- Staff feedback, either ad hoc or via internal forums and surveys,
- Product portfolio and performance measures such as account closure patterns, on a monthly and quarterly basis, and,
- Incidents, on a monthly basis

## **How will Newcastle Permanent review this document?**

Newcastle Permanent will review this document at a minimum of once every two years from the effective date to ensure it remains appropriate, or earlier as required or if other circumstances occur which trigger the need to review the TMD.

The specific review triggers (events that reasonably suggest the TMD may no longer be appropriate) for the Real Equity Credit Facility that may result in an earlier review of the TMD are:

- Any distribution or sales activity, outside the TMD or to ineligible customers, that meets the definition of a significant dealing,
- A material change in the nature and number of customer complaints and underlying complaint trends,
- Regulatory change that materially impacts the manufacture or sale of this product, and
- Material customer remediation events and incidents in relation to this product.