



Target Market Determination

Issuer:	OurMoneyMarket Lending Pty Ltd ABN 64 605 231 669 (“ OMM ” “ we ” “ us ” and “ our ”)
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Australian Credit Licence:	488228
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Enquiries & Information:	info@ourmoneymarket.com

This Target Market Determination (**TMD**) has been prepared in accordance with our Design and Distribution obligations under section 994B of the *Corporations Act 2001*(Cth) which requires issuers of financial products to ensure that financial products they issue are likely to be consistent with the likely *objectives, financial situation and needs* of the consumers for whom they are intended (the target market) and to assist distributors to ensure that financial products are distributed to customers within the target market.

Our TMD is not intended and does not provide financial advice and should be treated as providing general information only. Consumers should obtain independent advice prior to acquiring the product to ensure that it is appropriate for their particular *objectives, financial situation and needs*. Please refer to the product Terms and Conditions and our Credit Guide for more information.

1. Target Market

This product is designed for a class of consumers whose likely needs, objectives and financial situation are aligned with the product and the product’s key attributes (as set out below).

1.1 Consumer needs and objectives

This product is designed to fulfil the needs, objectives and financial situation of customers borrowing for personal purposes to purchase an asset, obtain additional funds for personal expenditure, to consolidate debts, or for any other credit worthy purpose deemed acceptable to us.

Customers have a fixed rate to provide certainty about the amount of each repayment. These customers are prepared and able to pay an interest rate which may be higher than prevailing variable rates in order to obtain this certainty.

The product also caters for customers who may, at a future time, have access to additional funds to repay the loan early and save on interest, without incurring fees for early repayment, or who may wish to make a larger lump sum repayment at the end of the loan term.

1.2 Consumer financial situation

Customers who are eligible for this product will have the following minimum characteristics as well as satisfy our eligibility criteria:

Income level:	\$25,000 (after-tax) or greater
Savings required:	N/A
Residency status:	Citizen or Permanent Resident
Employment status:	Employed or Self-employed
Age group:	18-72
Loan term:	1-7 years
Loan amount:	\$5,000.00 - \$110,000 (excluding establishment fee)

1.3 Product attributes, including key features

Our product has the following features.

Interest rate type	Fixed
Repayment type	Principal & interest
Repayment frequency	Weekly, fortnightly or monthly
Collateral	Unsecured or Secured, subject to credit assessment
Number of applicants	Single or joint applications are acceptable
Establishment Fee	An establishment fee is always payable. This fee is based on the customer's credit scorecard as determined by us (Establishment Fees are added to the loan amount)
Ongoing monthly fee	N/A
Balloon repayment	Option to include a final lump sum (balloon) repayment at the end of the loan term (subject to eligibility and lending criteria)

1.4 Why this product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market

The product allows customers to access credit to fund any credit worthy purpose in their personal capacity, as well as consolidate any existing debts they have.

Customers are provided with loan repayments that remain fixed during the term of the loan, providing customers with certainty of repayment amount and interest costs.

The fixed rate allows customers to make additional repayments at any time, at no extra cost, and repay the full loan at any time, at no extra cost. This will allow customers to pay down the principal debt sooner and reduce total interest payable.

The option to include a balloon repayment provides eligible customers with the flexibility to reduce the amount of their scheduled repayments during the term of the loan and make a larger, final lump sum repayment at the end of the loan term.

To ensure that the product is likely to be consistent with the likely objectives, financial situation and needs of customers in the target market, we have also considered the characteristics of those eligible to be between the age of 18-72 years old and be employed or self-employed.

In all circumstances, applications can only be approved by us, and customers must have a minimum credit score that is aligned with our credit policy and have the ability to make loan repayments and repay the interest as it accrues.

1.5 Consumers outside target market

This product may not be suitable for consumers who:

- do not meet the eligibility requirements noted above;
- do not satisfy our credit policy; or
- are seeking the flexibility of a variable interest rate.

2. Distribution of this product

The product must not be distributed to consumers who are not in the target market.

2.1 Direct online channels – Our app, website and sales team

Our online channels provide customers with access to information about the product's key attributes (such as fees and credit limits) and eligibility criteria, in an easy to navigate format.

Distribution conditions

Only authorised staff are permitted to assist consumers with applying for this product. Authorised staff must have the necessary training, skills and knowledge to assess whether consumers are within the target market.

These distribution conditions and distribution channel are appropriate because authorised staff have the necessary training, skills and knowledge to assess whether consumers are within the target market.

To ensure that this distribution channel remains appropriate, we may undertake:

- onboarding protocols and ongoing training for authorised staff; and
- periodic reviews of our processes and procedures to ensure ongoing fitness for purpose and compliance with relevant credit laws and regulatory guidance.

2.2 Third party retail distribution channel – Corporate vendor and merchant partners

Corporate vendor and merchant partners (**Suppliers**) may distribute the product.

Distribution conditions

Suppliers must:

- only distribute the product after entering into an appropriate agreement with us;
- undertake necessary training to ensure that they have the skills and knowledge to assess whether consumers are within the target market;
- hold an Australian Credit Licence or be a credit representative authorised to engage in credit activities on behalf of a credit licensee unless an exemption applies covering the provision of credit activities engaged in by Suppliers in respect of the product; and
- only distribute the product in accordance with this TMD and any guidelines provided by us; and

must at all times act in accordance with their obligations under their agreement with us and relevant credit laws.

These distribution conditions and distribution channel are appropriate as Suppliers:

- are appropriately authorised to engage in relevant credit activities or comply with relevant exemptions covering the provision of credit activities engaged in by Suppliers in relation to the product;
- have the skills and knowledge to assess whether consumers are within the target market so that the product is distributed to the target market in accordance with the TMD; and
- must comply with the terms agreed between us and Suppliers, as well as any guidelines we issue from time to time.

To ensure that this distribution channel remains appropriate, we may undertake:

- onboarding protocols for new Suppliers (including providing guidance and instructions on their reporting obligations under this TMD) and ongoing training (as required);
- periodic reviews of Suppliers' pages and customer origination journeys to ensure ongoing fitness for purpose and compliance with our agreement and relevant credit laws and regulatory guidance;
- periodic sampling of distribution practices to identify trends, themes, and emerging risks or issues.

2.3 Third party marketing channel – Digital marketing and affiliate partners

Other authorised digital marketing and affiliate partners may include rate comparison sites who present the product among a number of loan options to prospective consumers or referrers who enable consumers to access information about the product (**Partners**).

Distribution conditions

Partners must:

- only distribute the product after entering into an appropriate agreement with us;
- hold an Australian Credit Licence or be a credit representative authorised to engage in credit activities on behalf of a credit licensee unless an exemption applies covering the provision of credit activities in respect of the product.
- only distribute the product in accordance with this TMD and any guidelines provided by us and must at all times act in accordance with their obligations under their agreement with us and relevant credit laws; and
- accurately represent the key attributes of the product and, where multiple products are presented, must only present it among other "like" products.

These distribution conditions and distribution channel are appropriate as Partners:

- are appropriately authorised to engage in relevant credit activities or comply with relevant exemptions covering the provision of credit activities engaged in by Partners in relation to the product;
- must comply with the terms agreed between us and Partners, as well as any guidelines we issue from time to time

To ensure that this distribution channel remains appropriate, we may undertake:

- onboarding protocols for new Partners (including providing guidance and instructions on their reporting obligations under this TMD) and ongoing training (as required);
- periodic reviews of Partners' webpages and customer origination journeys to ensure ongoing fitness for purpose and compliance with our agreement and relevant credit laws and regulatory guidance; and
- periodic reviews of distribution practices to identify trends, themes, and emerging risks or issues.

3. Review of this TMD

We can review or amend this TMD at any time we consider necessary, and will always review this TMD when any of the following events occur:

3.1 Periodic Reviews

We will review this TMD annually by the anniversary of the effective date of this TMD.

3.2 Review Triggers

The following review triggers would reasonably suggest that the TMD may no longer be appropriate:

(a) Complaints

A significant change in the number of complaints relating to the key product attributes, product suitability, and/or sales of the product (taking into account the total number of customers using the product).

(b) Emerging trends:

We continuously monitors trends in customer outcomes to ensure that the product is consistent with the likely objectives, financial situation and needs of consumers within the target market. Trends that will trigger a review of the TMD include:

- 10% or more of gross loan receivables are in arrears of 30 days or more for this product.

(c) Significant dealing:

A significant dealing of the product to customers outside the target market occurs.

(d) Product changes:

If we make material changes to the product or the terms and conditions of the product.

(e) Distribution changes:

If we make material changes to the distribution channels or conditions.

(f) Changes in law:

Relevant changes in the law, a decision of a court, Australian Financial Complaints Authority (AFCA) or a regulatory body (including through regulatory guidance), that materially affects the product.

(g) Regulatory notification:

If we receive notification(s) from ASIC in writing requiring immediate cessation of distribution of the product, or cessation of particular conduct in relation to the product.

4. Monitoring and reporting of this TMD

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

Type of information	Description	Reporting period
Specific Complaints	Details of the complaint, including name and contact details of the complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
General information about complaints	Number of complaints and general feedback relating to the product and its performance	Quarterly
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware