

Target Market Determination

Version 1 dated March 2022



This Target Market Determination (TMD) has been prepared in accordance with the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019* and associated Regulations. TMDs are designed to assist issuers 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 the target market.

The TMD is general in nature and should not be construed as financial advice. Consumers should obtain independent advice prior acquiring the product to ensure that it is appropriate for their particular *objectives, financial situation and needs*.

Product	Chameleon Freedom (Mere Doc)
Reference documents	General Home Loan Terms and Conditions and Credit Guide
Issuer	Mortgage House Capital Funding No. 1 Pty Ltd ABN 99 603 910 210 Issuer of the Visa Debit Card is: Indue Ltd ABN 97 087 822 464 AFSL 320204
Date of TMD	1 March 2022
Target Market	<p>Description of target market</p> <p>The features of this product have been assessed as meeting the <i>likely objectives, financial situation and needs</i> of consumers who:</p> <ul style="list-style-type: none"> • meet the eligibility criteria; • require a loan to purchase or refinance an owner occupied or investment residential property; • may want access to other optional features and benefits (such as linked offset account); • require the flexibility of a variable interest rate; • want the option of either principal and interest or interest only (available for investment residential properties only) repayments; and • may want access to other features and benefits (such as linked offset account); and • are self employed and have limited levels of information in relation to employment and income and are therefore unable to provide the financial information necessary to access a lower interest rate. <p>Whilst variable interest rates may fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to make additional repayments and/or deposit funds into an offset account to reduce interest payable whilst retaining the ability to draw on those funds when required.</p> <p>Owner Occupied Residential Property</p>

	<p>This product allows consumers to finance the purchase or refinance of an owner occupied residential property with the ability to select principal and interest repayments in order to reduce the overall debt and build equity.</p> <p><i>Investment Residential Property</i></p> <p>This product allows consumers to finance the purchase or refinance of an investment property with the ability to select:</p> <ul style="list-style-type: none"> • principal and interest repayments in order to reduce the overall debt and build equity; or • interest only for tax purposes. <p><i>Visa debit card</i></p> <p>This product allows consumers to select the option of a visa debit card linked to their offset account in order to easily access their funds, including the ability to withdraw at ATMs and make purchases in person, online or over the phone.</p> <p><i>Description of product, including key attributes</i></p> <ul style="list-style-type: none"> • Variable interest rate. • Offset account is available; • Visa debit card linked to offset account is available. • Redraw is available on a variable interest rate. • Minimum loan amount \$150,000. • Maximum loan amount \$850,000. • Maximum loan term 30 years for all loan types. • Maximum Loan to Valuation Ratio (LVR): 80% including LMI. • Repayment options: <ul style="list-style-type: none"> ○ principal and interest for Owner Occupied. ○ principal and interest and interest only for Investment. • Repayment frequency – weekly, fortnightly or monthly. • Application fee is payable. • Settlement fee is payable. • Annual Facility fee is payable. • Nil redraw fee for redraw conducted via internet banking (a fee applies for staff assisted redraw). <p><i>Classes of consumers for who the product may not be suitable</i></p> <p>This product may not be suitable for consumers who:</p> <ul style="list-style-type: none"> • do not meet the eligibility requirements; • are seeking the certainty of fixed repayments over the term of the loan; • have access to the required information in relation to employment and income to apply for a full doc loan with a lower interest rate; 				
<p>Distribution Conditions</p>	<p><i>Distribution conditions</i></p> <p>The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:</p> <table border="1" data-bbox="432 1865 1386 1989"> <thead> <tr> <th>Channel</th><th>Conditions</th></tr> </thead> <tbody> <tr> <td>Direct – by phone</td><td>Only authorised staff are permitted to assist consumers with this product. Authorised staff have the necessary training, skills and knowledge</td></tr> </tbody> </table>	Channel	Conditions	Direct – by phone	Only authorised staff are permitted to assist consumers with this product. Authorised staff have the necessary training, skills and knowledge
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		to assess whether the consumer is within the target market.												
	Third party – Accredited mortgage brokers subject to Best Interests Duty (BID) and related obligations	All applications submitted by accredited mortgage brokers must comply with our policies and procedures issued to accredited brokers from time to time. Accredited mortgage brokers are subject to a higher duty under BID to ensure that the Product is in the best interests of the particular consumer.												
	<p>The distribution channels and conditions are appropriate because:</p> <ul style="list-style-type: none"> • our distributors have been adequately trained to understand their DDO obligations; • we rely on existing distributors, methods, controls and supervision already in place; • our approval system has controls in place to flag applicants who may be outside the target market; • accredited mortgage brokers are subject to a higher duty under BID to ensure that the product is appropriate for the particular consumer; 													
Review Triggers	<p>The following review triggers would reasonably suggest that the TMD may no longer be appropriate:</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 are received from customers in relation to the product; • A significant number of defaults occur; <p>There is a material change to the product or the terms and conditions of the product.</p>													
Review Periods	<p>First review date: 1 October 2022</p> <p>Periodic reviews: at least every 12 months from the initial review and each subsequent review.</p> <p>Trigger reviews: review to be completed within 10 business days of the identification of a trigger event.</p>													
Distribution Information Reporting Requirements	<p>The following information must be provided to [insert name of issuer] by distributors who engage in retail product distribution conduct in relation to this product:</p> <table border="1"> <thead> <tr> <th>Type of information</th><th>Description</th><th>Reporting period</th></tr> </thead> <tbody> <tr> <td>Specific Complaints</td><td>Details of the complaint, including name and contact details of complainant and substance of the complaint.</td><td>As soon as practicable and within 10 business days of receipt of complaint.</td></tr> <tr> <td>Complaints</td><td>Number of complaints and general feedback relating to the product and its performance</td><td>Every 1 month</td></tr> <tr> <td>Significant dealing(s)</td><td>Date or date range of the significant</td><td>As soon as practicable, and in any</td></tr> </tbody> </table>		Type of information	Description	Reporting period	Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.	Complaints	Number of complaints and general feedback relating to the product and its performance	Every 1 month	Significant dealing(s)	Date or date range of the significant	As soon as practicable, and in any
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		dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	case within 10 business days after becoming aware
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