

5th October 2021

Allstate are a Mortgage Manager (a non-bank lender) who operate a Business to Business (B2B) model in Australia and do not compete with our broker introducers - i.e. no cross sales as we provide only mortgages.

Allstate began operations in Brisbane in 1995, and are a boutique mortgage manager with a limited distribution network that offers personalised, timely service. We specialize in products that are offered by a range of funders that offer niche solutions for customers that may not fit with the Big 4 lenders due to their specific circumstances at that particular time.

Due to the constant changes across these funders, it is very difficult for the average broker to keep up to date with the products, policies and offerings from this market segment which offers an extensive range of products.

AFCA have deemed that a Mortgage Manager is an agent of the bank (funder) and our role is to submit quality applications to the funder that meet their requirements in a format that will allow faster processing.

- Allstate do not hold a Delegated Underwriting Authority (DUA) with any of our funders, which means that the final credit decision is always made by the funder.
- Allstate do not generate loan statements or operate telephone or internet banking, but our Customer Service team will assist our customers in accessing these facilities which are maintained by the funder.
- Allstate do not engage in any collection activity on behalf of the funder – all arrears and collection activity is conducted by the funder.

In the event of a complaint, this may need to be done on a multi-tier IDR process where the complaint may be directed to Allstate, the funder or both Allstate and the funder, depending on the nature of the complaint and the responsibility and control of the process involved.

(Many financial firms operate multi-tier IDR processes).

We currently act as agents for the following funders and use the following colours to identify their product range:

Cabernet	Origin Mortgage Management Services Pty Ltd
Gold	Brighten Home Loans Pty Limited
Green	Sintex Consolidated Pty Limited
Ocean	ORDE Financial Pty Ltd
Orange	RESIMAC Limited
Purple	La Trobe Financial Services Limited
RedZed	RedZed Lending Solutions

Target Market Determination

Issue Date: 5 October 2021

1. What is a Target Market Determination?

A Target Market Determination (**TMD**) establishes the target market of consumers this product has been designed for as determined by ORDE Financial. It also sets out conditions for product distribution, triggers to review the target market and other reporting requirements.

A TMD is **not** a full summary of the product features or terms of the product. It is not intended to be a customer disclosure document and does not consider any person's individual objectives, financial situation or needs. Consumers interested in acquiring this product should carefully read the Loan Contract, Key Fact Sheet and General Terms & Conditions issued to them before deciding whether to proceed.

Product Name	<ul style="list-style-type: none"> Allstate Ocean Residential Home Loan (Full Doc & Alt Doc) Allstate Ocean Xpat Non-Resident Home Loan (Full Doc Only)
Issuer	BNY Trust Company of Australia Limited ABN 49 050 294 052 ("BNY")
Made by	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE") on behalf of BNY
Servicer	ORDE
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	1.0
Cease Date	In Use

2. Class of consumers that fall within this target market

Consumer type

Full Doc Loan – Suitable for consumers over the age of 18 who are employed (PAYG), self-employed, self-funded retirees or pensioners who can provide evidence of their taxable income for verification.

Alt Doc Loan – Suitable for consumers over the age of 18 where one or multiple applicants are self-employed and unable to fully verify their income with the most recent years tax returns.

Non-Resident Loan – Suitable for consumers over the age of 18 who are PAYG employed outside of Australia, or do not hold Australian Citizenship or Permanent Residency.

Product description and key attributes & consistency between target market and the product

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

The key eligibility requirements and product attributes of these Products as well as the consistency with likely objectives, financial situation and needs of the class of consumers in the target market are outlined below:

	Key Attributes of the Products	Consistency with likely Objectives, Financial Situation & Needs
Security Type	Owner Occupied or Investment	This product is likely to meet objectives and needs for both owner occupied and investment consumers.
Loan Amount	\$100,000 - \$2,500,000	This product is likely to meet the needs of consumers looking for a loan amount of \$100,000 up to \$2,500,000

	Key Attributes of the Products (continued)	Consistency with likely Objectives, Financial Situation & Needs of the class of consumers in the target market (continued)
Loan to Value Ratio (LVR)	<ul style="list-style-type: none"> Residential Home Loan ≤ 80% Non-Resident Home Loan ≤ 75% 	<ul style="list-style-type: none"> This product is likely to meet the needs of consumers looking for a LVR up to 80% This product is likely to meet the needs of consumers looking for an LVR up to 75%
Loan Term	10 – 30 years	This product is likely to meet the needs of consumers looking for a loan term up to 30 years.
Repayment Type	<ul style="list-style-type: none"> Principal & Interest Interest only (Up to 5 years) reverting to Principal & Interest 	<ul style="list-style-type: none"> Consumers seeking Principal & Interest repayments are likely to have one or more of the following needs: <ul style="list-style-type: none"> The ability to minimise interest paid over the life of the loan The ability to build home equity from the commencement of the loan; and/or Seeking the lowest possible available interest rate Consumers seeking Interest Only repayments are likely to have one or more of the following needs: <ul style="list-style-type: none"> To follow advice of their financial advisor/accountant, or for taxation reasons; and/or Seeking to preserve cashflow by reducing their required repayments
Repayment Frequency	Weekly, fortnightly, or monthly (Interest Only – monthly)	The varied repayment types available are likely suitable for consumers in paid employment so they may align their loan repayment frequency to their income deposit.
Interest Rate Type	Variable	<p>This interest rate type is likely to be suitable for consumers who need one or more of the following:</p> <ul style="list-style-type: none"> The ability to take advantage of potential future interest rate decreases The ability to make extra repayments to their loan; and/or Flexibility allowing early repayment of their loan
Account Management	Digital customer account access	This is likely to be suitable for customers that wish to access their loan account online or via a phone application.

Note that exceptions to the above may be made on a case by case basis where still consistent with the consumers objectives, financial situation, and needs.

Objectives, financial situation, and needs

The Loan Products are designed for individuals who may be seeking the following:

- Obtain a home loan to purchase residential property;
- Arranging to refinance an existing home loan
- Accessing equity built up in an existing residential property; and/or
- Consolidating debts

Consumers may have additional needs for their home loan including:

- Redraw with no fees, subject to terms and conditions within the Loan Contract;
- Ability to make additional loan repayments; and
- Interest Only – may be allowed for a period, subject to lending assessment. An interest rate loading may be applicable for this type of loan repayment.

3. How this product is to be distributed

This product can only be distributed through the following means:

Direct to Consumer

Allstate may distribute this product to customers via an appropriately trained member of our Customer Assist team.

Third Party Distribution

Accredited third party introducers:

- mortgage brokers; and
- aggregators

Distribution conditions

The distribution channels and conditions are appropriate because:

- The Products have a wide target market;
- Allstate Home Loans conducts a preliminary credit suitability assessment on each loan application;
- ORDE Financial conducts a full credit assessment on every loan application to ensure that the objectives, financial situation and needs of the consumer are met; and
- Third party introducers must hold an Australian Credit Licence or maintain an appointment as a Credit Representative authorised to engage in credit activities on behalf of a credit licensee. They are also subject to a best interest duty to ensure that the Product is in the best interests of the specific consumer.

4. Reviewing this target market determination

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

Initial review	Within 12 months of the effective date.
Periodic reviews	At least every 12 months from the last review.
Review triggers or events	Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited to): <ul style="list-style-type: none">• a material change to the design or distribution of the product, including related documentation;• occurrence of a significant dealing;• distribution conditions found to be inadequate;• external events such as adverse media coverage or regulatory attention; and• significant changes in metrics, including, but not limited to, complaints

Where a review trigger has occurred, this TMD will be reviewed within 10 business days.

5. Reporting and monitoring this target market determination

We may collect the following information from our distributors in relation to this TMD.

Complaints

Distributors will report all complaints in relation to the products covered by this TMD on a quarterly basis. The report will include:

- number of complaints; and
- general feedback relating to the Products and their performance for active loans of these types

The report will be made by email to the Head of Compliance (compliance@allstatehomeloans.com.au).

Significant dealings

Distributors will report if they become aware of a significant dealing in relation to this TMD within 10 business days. The report will include:

- date or date range of the significant dealing; and
- description of the significant dealing (i.e., why it is not consistent with the target market determination)

The report will be made by email to the Head of Compliance (compliance@allstatehomeloans.com.au).



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