

Target Market Determination for SMSF -Variable Investment Product

This Target Market Determination (**TMD**) which is required by law is to make sure that our customers objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances where we will review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

***IMPORTANT:** This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant **terms and conditions** and **credit guide** and seek independent financial or legal advice before making any decision.*

Product	Cabernet Flex SMSF, Easy SMSF Refi, FlexCom SMSF – Variable Investment Product
Product Manager	Columbus Capital Pty Ltd ACN 119 531 252, Australian Financial Services Licence and Australian Credit Licence 337303
Issuer	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below:</p> <ul style="list-style-type: none"> (a) Perpetual Corporate Trust Limited (ACN 000 341 533), Australian Credit Licence 392673; (b) Pioneer First Australia Pty Limited ACN 086 092 613; (c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721; (d) Origin Money Pty Ltd ACN 621 866 242; (e) Origin Mortgages Pty Ltd ACN 629 566 794; <p>to be referred to as (Columbus/we/us).</p>
Effective Date of TMD	20 February 2024.
TMD Version	2024.1
Next review due:	At least every 12 months from the Effective Date of this Target Market Determination

*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at www.originmms.com.au.

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Target Market

We have undertaken an assessment of the product and are of the view that the Product Attributes are likely to be consistent with the Objectives and Needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for target Market
<ul style="list-style-type: none"> ▪ Seeking a property loan with a range of features including repayments that can vary over the life of the loan for any of the following purposes: <ul style="list-style-type: none"> ○ purchasing, refinancing, a residential, investment, NDIS or commercial investment property; ○ purchase of an investment house and land package and/or; ○ off the plan purchase as investors. 	<ul style="list-style-type: none"> ▪ The property loan account has a variable interest rate, meaning that repayments will vary based on changes to the interest rate. ▪ The loan amount can be used for any one or more of the listed purposes. ▪ SMSF Investment & Commercial Investment loans offer: <ul style="list-style-type: none"> ○ Principal and Interest; or ○ Interest Only, is available for an agreed period. ▪ SMSF NDIS Investment loans offer: <ul style="list-style-type: none"> ○ Principal and Interest. ▪ Fees, charges, and third-party costs will be payable.
<ul style="list-style-type: none"> ▪ Flexibility to make additional payments more than the required monthly repayment amount and switch between principal & interest and interest only repayments 	<ul style="list-style-type: none"> ▪ Unlimited additional repayments (including the ability to pay the loan out early) can be made without additional charge. ▪ A customer can switch between principal & interest and interest only repayment (terms and conditions apply).
<ul style="list-style-type: none"> ▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan 	<ul style="list-style-type: none"> ▪ Credit balances in the Offset Account will reduce the balance on which interest is charged. ▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using: <ul style="list-style-type: none"> ○ Online and Mobile Application access; ○ Direct debit & BPAY repayment facility; and ○ Staff assisted channels.

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Eligibility Criteria for the Product

To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:

- have a registered and compliant Australian Self-Managed Superannuation Fund (SMSF) and are:
 - the members and directors of the SMSF are an Australian Citizen or a Permanent Resident of Australia;
 - a SMSF has a Corporate Trustee;
 - must hold a beneficial interest in the security property;
 - must meet all relevant legislative & associated regulation requirements to acquire the property & borrow from the Property Trustee in accordance with the Superannuation Industry (Supervision) Act 1993; and
 - must hold the legal interest in the security property on trust for the SMSF;
- meet our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- guarantor who supports the loan also meets our lending eligibility criteria.

Financial Situation

The financial situation of the Target Market are consumers that:

- meet our lending eligibility and credit assessment criteria which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers' deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer's ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.

Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market product and in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"> ▪ Staff assisted channels (e.g., via email or phone) 	<ul style="list-style-type: none"> ▪ Our staff have the necessary training, knowledge, and accreditation (if required): <ul style="list-style-type: none"> ○ to understand and can discuss the features and rates of our products; ○ to understand and can discuss the key differences of our products; ○ to assess whether the consumer is within the target market;

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	<ul style="list-style-type: none"> ○ to assess whether the consumer meets our lending eligibility lending criteria; and ○ have access to product resources such as borrowing and repayment calculators, stamp duty & upfront cost calculator, pricing tools etc. <ul style="list-style-type: none"> ▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place. ▪ We have approval control systems and processes in place that checks and flags applicants who may be outside the Target Market.
<ul style="list-style-type: none"> ▪ Online channels (e.g., website and the mobile app) 	<ul style="list-style-type: none"> ▪ The product cannot be distributed through online channels however the application process may commence online. ▪ Applications commenced through an online channel will be directed through to a staff assisted channel.
<ul style="list-style-type: none"> ▪ Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (BID) obligations 	<ul style="list-style-type: none"> ▪ A distributor must: <ul style="list-style-type: none"> ○ hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee; ○ comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and ○ comply with their legal obligations. ▪ Third party brokers must also: <ul style="list-style-type: none"> ○ hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and ○ comply with their obligation to act in the best interests of their client when providing credit assistance. ▪ These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.

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Review Triggers

Columbus has outlined below its review triggers of this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers of this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> ▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance; ▪ Unexpected early-stage arrears are detected; ▪ A significant number of defaults occur; ▪ A significant number of late repayments are being recorded; ▪ Evidence that the product or distributor conduct are significantly different to the target market.
Complaints	<ul style="list-style-type: none"> ▪ A significant number of material complaints are received from consumers in relation to the product.
Incident Data	<ul style="list-style-type: none"> ▪ A material incident or significant number of incidents in relation to the product's design or distribution that identify breaches of our legal or regulatory obligations.
Changes to the Product	<ul style="list-style-type: none"> ▪ The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).
Significant Dealings	<ul style="list-style-type: none"> ▪ A significant dealing of the product to consumers outside the target market occurs.
Notification from ASIC	<ul style="list-style-type: none"> ▪ The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

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Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
Complaints	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
Feedback	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
Information requested	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.