



# Target Market Determination

## for Elite Non-Resident – Investment Variable

### 1. Product

Elite Non-Resident – Investment Variable

### 2. Issuer

Columbus Capital Pty Ltd ACN 119 531 252, Australian Financial Services Licence and Australian Credit Licence 337303 (Columbus)

("Columbus/we/us")

Indue Ltd ACN 087 822 464 is the issuer of the Visa debit card attached to the loan product.

### 3. Version No.

2021.2

### 4. Date effective

5 October 2021

### 5. About the TMD

This Target Market Determination (TMD) document is not intended to provide financial advice. Please refer to our Terms and Conditions and Credit Guide before deciding product suitability. Our product terms and conditions will be provided to you upon request.

This TMD aims to provide an understanding of the class of customers we have designed this product for, being the target market. When considering the target market, we focused on our customers' objectives, financial situation, and needs within this class of people we believe this product to be suitable.

### 6. Target Market

#### 6.1 Description of target market

The features of this product have been assessed as meeting the likely objectives, financial situation and needs of consumers who:

- are:
- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - Non-resident applicants may require approval from the Foreign Investment Review Board (FIRB) before they can purchase real estate.



- Salary and Wage earners (Employees) and Self-Employed Consumers only (Company and business borrowers are excluded).
- The applicant(s) must provide their passport and a secondary photo identification as identification to satisfy Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF) requirements; and
  - Only to borrowers situated in “Approved Countries”
    - require a loan to purchase or refinance an investment property;
    - require an offset account;
    - require the flexibility of a variable interest rate;
    - require the ability to make additional extra repayments without penalty; and
    - want the option of either principal and interest or interest only repayments.
    - satisfy our eligibility criteria;

Although variable interest rates fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

## 6.2 Classes of consumers for who the product may not be suitable

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are seeking the certainty of fixed repayments over the term of the loan;
- are looking to purchase or refinance a residential owner-occupied property;
- are looking to construct a property; or
- require the ability to provide alternative methods of income verification.

## 6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principal and interest; or
  - interest only
- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$1,500,000 (subject to LVR and postcode policy)
- Maximum LVR: 80%
- Offset facility available for a fee of \$395
- Application fee is payable
- Settlement fee is payable
- Valuation fee is payable
- Ongoing fee is payable

## 7. Distribution Conditions/ Restrictions

The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:



- Direct
  - Online
  - By phone
  - In person (e.g., branch, agency, or premises visit)
- Third party – Accredited mortgage brokers subject to Best Interests Duty (BID)

The distribution channels and conditions are appropriate because:

- the product has a wide target market;
- our staff have the necessary training, knowledge and accreditation (if required) to assess whether the consumer is within the target market. All of our staff must continually satisfy annual compliance reviews.
- we rely on existing distributors, methods, controls and supervision already in place;
- our approval system has checks and controls in place to flag applicants who may be outside the target market; and
- 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.

## 8. TMD Reviews

We will review this TMD as follows:

Initial review	Within 12 months of the date of this TMD
Periodic review	Each year on the anniversary of this TMD.
Review triggers	<p>Specific events will prompt Columbus to review this TMD, which includes:</p> <ul style="list-style-type: none"> <li>- A significant dealing of the product to consumers outside the target market occurs;</li> <li>- A significant number of complaints are received from customers in relation to the product;</li> <li>- A significant number of defaults occur;</li> <li>- A significant breach has occurred in connection with the issuing and distribution of this product; and</li> <li>- A significant number of late repayments are being recorded;</li> <li>- A material change is made to this product.</li> <li>- Unexpected early-stage arrears are detected</li> </ul>

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

## 9. Monitoring and reporting of this TMD

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
Specific Complaints	Details of the complaint, including name and contact details of	As soon as practicable and within 10 business days of receipt of complaint.



	complainant and substance of the complaint.	
Complaints	Number of complaints	Every 6 months
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 10 business days after becoming aware