

## **Target Market Determination (TMD) – National Motor Loans Secured Personal Loan**

**Issuer of this TMD – National Motor Loans Pty Ltd**

**Date of TMD – 5th October 2021**

This Target Market Determination (TMD) is required under section 994B of the Corporations Act 2001 (Cth). It sets out the target market for the product, distribution conditions and restrictions, triggers to review and certain other information. It forms part of NML product design and distribution framework for the product.

This document is not a summary of all product features, fees, or terms of the product. This document does not consider any person's individual objectives, financial situation or needs. Persons interested in acquiring this product should carefully read the "Loan Contract Terms and Conditions" before deciding whether to apply for this product.

### **Describe the class of retail clients that comprises the target market (within the ordinary meaning of the term) for the product – S994B(5)(b)**

This product has been designed for customers who are individuals and who:

- require a loan for an approved purpose
- require a loan for a term between 1 to 5 years, for loan amounts of at least \$5,000, that is to be repaid with regular repayments;
- require certainty around repayments with a fixed repayment amount and interest rate, however also value flexibility to make extra repayments or repay the loan early (subject to an extra charge).
- can afford the loan amount having regard to NML's credit risk assessment.

### **Description of Product (including key attributes) and description of why the products is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target markets – RG 274.68.**

#### **Key attributes**

The key attributes of this product that are likely to be consistent with the [likely objectives, financial situation and needs of customer in the target market include:

- Loan amounts of at least \$5,000
- Fixed loan term starting at 1 year up to 5 years.
- Fixed interest rate for the term of the loan.
- Types of fees payable, (including establishment fee, monthly loan service fee, late fee, and early termination fee);
- Customers make scheduled payments at regular intervals over the term of the loan.
- Customers can make extra repayments (including repaying the loan in full) at any time. A charge may apply to early repayment of the loan.

**Specify any conditions and restrictions on retail product distribution conduct in relation to the product (distribution conditions), other than a condition or restriction imposed by or under another provision. S994B(5)(c)**

Certain conditions and restrictions apply to the distribution of this product so that it is reasonably likely to be provided to customers who are in the target market for the product.

This product can only be distributed by:

- NML's approved & accredited aggregation network and their affiliated brokers (i.e., they must meet NML's accreditation criteria):
- Only trained and accredited broker employees can assist a customer to apply for this product.
- Brokers also need to ensure that customers meet the eligibility requirements for the NML Secured Personal Chattel Mortgage Loan.

**A distributor of a financial product must notify the issuer of a significant dealing in the product that is not consistent with the product's TMD – RG 274.211**

This occurs when a broker sends NML a request for a product that is not offered by NML.

**If a broker becomes aware of such a dealing, it must notify the NML in writing as soon as practicable, and in any event within 10 business days after becoming aware. S994F(6)**

**Specify events and circumstances (review triggers) that would reasonably suggest that the determination is no longer appropriate. S994B(5)(d)**

NML will review this TMD if any of the following events or circumstances occur where they reasonably suggest that the TMD is no longer appropriate:

**Review Trigger 1:**

Relevant changes in the law, applicable industry code, decision of a court or other regulatory body (including through regulatory guidance), that materially affects the product.

Note: The above trigger is a mandatory review. The product issuer may choose to undertake a review even if the above review trigger is not met.

**Review trigger 2**

Significant or unexpectedly high number of complaints regarding product design and distribution, including Australian Financial Complaints Authority (AFCA) determinations, that would reasonably suggest that the TMD requires review.

**Review trigger 3**

NML will measure leading indicators to determine if product performance is materially inconsistent with NML's expectations, that would reasonably suggest that the TMD requires review.

Leading indicators for potential review triggers:

Leading indicators and trends are measures or observations that may be suggest that the TMD requires a review.

Some of these are noted below:

- Internal decisions to amend or modify the product, its features, or its distribution including changes to pricing.
- Regulator and other feedback received.
- Portfolio performance, including customer assistance.
- The nature and volume of any significant dealings out of the target market.

**Specify the maximum period from the start of the day the determination is made to the start of the day the first review of the determination under section 994C is to finish.  
S994B(5)(e)(f)(g)**

**Periodic review of TMD**

NML will review this TMD periodically to ensure that it remains appropriate.

- Initial review of TMD: within [12] months from the date this TMD is made; and
- Ongoing review of TMD: within [12] months from the date of the last review.

**Credit facility provided by National Motor Loans Pty Ltd (ABN 59 126 911 635 ACL 386596)**