

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"> Skyblue Residential Bridging Home Loan
Issuer	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	2.0 – December 2022
Cease Date	In Use

2. Class of consumers that fall within this target market

Consumer type

Residential Bridging Loan – Suitable for consumers over the age of 18 who require a loan that finances the purchase of a new property while they are selling their existing property.

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
Loan to Value Ratio (LVR)	Residential Bridging Home Loan ≤ 80%	This product is likely to meet the needs of consumers looking for a LVR up to 80%
Loan Term	6 months – 30 years	This product is likely to meet the needs of consumers looking for either a short term bridging solution or longer residential home loan.
	Key Attributes of the Products (continued)	Consistency with likely Objectives, Financial Situation & Needs of the class of consumers in the target market (continued)

Repayment Type	<ul style="list-style-type: none"> Interest Only (Up to 18 months) Interest Only (Up to 18 months) reverting to Principal & Interest 	<ul style="list-style-type: none"> Interest Only repayments allow overall repayments to be kept at a minimum while sale of existing property occurs Where residual debt exists the allows the customer to revert to principal & interest repayments
Repayment Frequency	<ul style="list-style-type: none"> Monthly while Interest Only (Interest budget retained to meet repayments) Weekly, fortnightly, monthly once partial discharge occurs. 	Interest budget held is likely suitable for consumers who are looking to utilise proceeds from a sale of a property to repay the loan commitment.
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.

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 while they are selling an existing property;
- Seeking to keep their required repayments at a minimum until the sale of their existing property; and
- Either finalise the loan from the proceeds of sale or revert to a Standard Residential Home Loan after sale proceeds reduce the outstanding balance.

Consumers may have additional needs for their home loan including:

- Ability to make additional loan repayments;

3. How this product is to be distributed

This product can only be distributed through the following means:

Direct to Consumer

Australian Financial Holdings Pty Ltd 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;
- Australian Financial Holdings Pty Ltd 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	<p>Any event or circumstances arising that would suggest the TMD is no longer appropriate. This may include (but not limited):</p> <ul style="list-style-type: none"> • a material change to the design features 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. 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 (customer.service@australianfinancial.com).

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
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Product Name	<ul style="list-style-type: none"> Skyblue Residential Home Loan (Full Doc & Alt Doc) Skyblue Non-Resident Home Loan (Full Doc Only)
Issuer	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	2.0 – December 2022
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.

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	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 \leq 80% Non-Resident Home Loan \leq 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

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Third Party Distribution

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- date or date range of the significant dealing; and
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Product Name	<ul style="list-style-type: none"> • Skyblue Residential Home Loan (Full Doc & Alt Doc) • Skyblue 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

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	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

Australian Financial Holdings Pty Ltd may distribute this product to customers via an appropriately trained member of the Australian Financial Holdings 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;
- Australian Financial Holdings Pty Ltd 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

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Initial review	Within 12 months of the effective date.
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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 (Customer.Service@australianfinancial.com).

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:

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Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	2.0 – December 2022
Cease Date	In Use

2. Class of consumers that fall within this target market

Consumer type

Residential Bridging Loan – Suitable for consumers over the age of 18 who require a loan that finances the purchase of a new property while they are selling their existing property.

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Loan to Value Ratio (LVR)	<ul style="list-style-type: none"> Residential Home Loan \leq 80% Non-Resident Home Loan \leq 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

Australian Financial Holdings Pty Ltd 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;
- Australian Financial Holdings Pty Ltd 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 arising 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 features 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. 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 (customer.service@australianfinancial.com).

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 (customer.service@australianfinancial.com).

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 requirements. 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	Residential Bridging Home Loan
Issuer	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	3.0 – March 2023
Cease Date	In Use

2. Class of consumers that fall within this target market

Consumer type

Residential Bridging Loan – Suitable for consumers over the age of 18 who require a loan that finances the purchase of a new property while they are selling their existing property.

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 requirements 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 requirements of the class of consumers in the target market are outlined below:

	Key Attributes of the Products
Security Type	Residential property (including Vacant Land) for Owner Occupied or Investment use
Loan Amount	\$100,000 - \$2,500,000
Loan to Value Ratio (LVR)	Residential Bridging Home Loan \leq 80%
Loan Term	6 months – 30 years

	Key Attributes of the Products (continued)	Consistency with likely Objectives, Financial Situation & Requirements of the class of consumers in the target market
Repayment Type	<ul style="list-style-type: none"> Interest Only (Up to 18 months) Interest Only (Up to 18 months) reverting to Principal & Interest 	<ul style="list-style-type: none"> Interest Only repayments allow overall repayments to be kept at a minimum while sale of existing property occurs Where residual debt exists the allows the customer to revert to principal & interest repayments
Repayment Frequency	<ul style="list-style-type: none"> Monthly while Interest Only (Interest budget retained to meet repayments) Weekly, fortnightly, monthly once partial discharge occurs. 	Interest budget held is likely suitable for consumers who are looking to utilise proceeds from a sale of a property to repay the loan commitment.
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.

Objectives, financial situation, and requirements

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

- Obtain a home loan to purchase residential property while they are selling an existing property;
- Seeking to keep their required repayments at a minimum until the sale of their existing property; and
- Either finalise the loan from the proceeds of sale or revert to a Standard Residential Home Loan after sale proceeds reduce the outstanding balance.

Consumers may have additional requirements for their home loan including:

- Ability to make additional loan repayments;

3. How this product is to be distributed

This product can only be distributed through the following means:

Direct to Consumer

ORDE Financial 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;
- mortgage managers; and
- aggregators

Distribution conditions

The distribution channels and conditions are appropriate because:

- The Products have a wide target market;
- ORDE Financial conducts a full credit assessment on every loan application to ensure that the objectives, financial situation and requirements 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 higher duty under 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	<p>Any event or circumstances arising that would suggest the TMD is no longer appropriate. This may include (but not limited to):</p> <ul style="list-style-type: none"> • a material change to the design features 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. 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@ORDE.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@ORDE.com.au).

Target Market Determination

Issue Date: 1 April 2023

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 requirements. 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	Commercial Loan (Full Doc & Alt Doc)
Issuer	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	1.0 – March 2023
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.

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 requirements 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 requirements of the class of consumers in the target market are outlined below:

	Key Attributes of the Products
Security Type	Commercial property held for Investment
Loan Amount	\$100,000 - \$2,500,000
Loan to Value Ratio (LVR)	≤ 75%
Loan Term	10 – 30 years

	Key Attributes of the Products (continued)	Consistency with likely Objectives, Financial Situation & Requirements of the class of consumers in the target market
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 requirements: <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 requirements: <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 requirements.

Objectives, financial situation, and requirements

The Loan Products are designed for individuals who may be seeking to utilise commercial property as security for the following:

- Purchase residential property;
- Arranging to refinance an existing home loan
- Accessing equity built up in an existing commercial property for personal purposes; and/or
- Consolidating personal debts

Consumers may have additional requirements for their 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

ORDE Financial 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;
- mortgage managers; and
- aggregators

Distribution conditions

The distribution channels and conditions are appropriate because:

- The Products have a wide target market;
- ORDE Financial conducts a full credit assessment on every loan application to ensure that the objectives, financial situation and requirements 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 arising 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 features 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. 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@ORDE.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@ORDE.com.au).

Target Market Determination

Issue Date: 1 April 2023

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 requirements. 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	Expat Home Loan (Full Doc Only)
Issuer	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	1.0 – March 2023
Cease Date	In Use

2. Class of consumers that fall within this target market

Consumer type

Expat Loan – Suitable for Australian Citizens and Permanent Residents over the age of 18 who derive greater than 50% of their income from sources overseas. This income may be derived from PAYG employment or self employment.

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 requirements 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 requirements of the class of consumers in the target market are outlined below:

	Key Attributes of the Products
Security Type	Residential property (including Vacant Land) for Owner Occupied or Investment use
Loan Amount	\$100,000 - \$2,000,000
Loan to Value Ratio (LVR)	≤ 80%
Loan Term	10 – 30 years

	Key Attributes of the Products (continued)	Consistency with likely Objectives, Financial Situation & Requirements of the class of consumers in the target market
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 requirements: <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 requirements: <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 requirements.

Objectives, financial situation, and requirements

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 requirements for their home loan including:

- 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

ORDE Financial 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;
- mortgage managers; and
- aggregators

Distribution conditions

The distribution channels and conditions are appropriate because:

- The Products have a wide target market;
- ORDE Financial conducts a full credit assessment on every loan application to ensure that the objectives, financial situation and requirements 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 arising 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 features 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. 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@ORDE.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@ORDE.com.au).

Target Market Determination

Issue Date: 1 April 2023

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 requirements. 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	Non-Resident Home Loan (Full Doc Only)
Issuer	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	1.0 – March 2023
Cease Date	In Use

2. Class of consumers that fall within this target market

Consumer type

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 requirements 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 requirements of the class of consumers in the target market are outlined below:

	Key Attributes of the Products
Security Type	Residential property for Owner Occupied or Investment use
Loan Amount	\$100,000 - \$1,500,000
Loan to Value Ratio (LVR)	≤ 75%
Loan Term	10 – 30 years

	Key Attributes of the Products (continued)	Consistency with likely Objectives, Financial Situation & Requirements of the class of consumers in the target market
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 requirements: <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 requirements: <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 requirements.

Objectives, financial situation, and requirements

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 requirements for their home loan including:

- 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

ORDE Financial 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;
- mortgage managers; and
- aggregators

Distribution conditions

The distribution channels and conditions are appropriate because:

- The Products have a wide target market;
- ORDE Financial conducts a full credit assessment on every loan application to ensure that the objectives, financial situation and requirements 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 arising 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 features 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. 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@ORDE.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@ORDE.com.au).

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 requirements. 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	Residential Home Loan (Full Doc & Alt Doc)
Issuer	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	3.0 – March 2023
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.

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 requirements 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 requirements of the class of consumers in the target market are outlined below:

	Key Attributes of the Products
Security Type	Residential property (including Vacant Land) for Owner Occupied or Investment use
Loan Amount	\$100,000 - \$2,500,000
Loan to Value Ratio (LVR)	≤ 80%

Loan Term	10 – 30 years	
	Key Attributes of the Products (continued)	Consistency with likely Objectives, Financial Situation & Requirements of the class of consumers in the target market
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 requirements: <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 requirements: <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 requirements.

Objectives, financial situation, and requirements

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 requirements 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

ORDE Financial 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;
- mortgage managers; and
- aggregators

Distribution conditions

The distribution channels and conditions are appropriate because:

- The Products have a wide target market;
- ORDE Financial conducts a full credit assessment on every loan application to ensure that the objectives, financial situation and requirements 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 arising 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 features 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. 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@ORDE.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@ORDE.com.au).

Target Market Determination

Issue Date: 1 April 2023

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 requirements. 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	Residential SMSF Loan
Issuer	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
Servicer	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
Reference Documents	General Terms & Conditions, Credit Guide and Key Fact Sheet
Version	1.0 – March 2023
Cease Date	In Use

2. Class of consumers that fall within this target market

Consumer type

Residential SMSF Loan – Suitable for consumers who are trustees of a self-managed super fund who are seeking to invest in residential property within their fund. The trustees should have a minimum of \$150,000 within superannuation.

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 requirements 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 requirements of the class of consumers in the target market are outlined below:

	Key Attributes of the Products Requirements
Security Type	Residential property held for Investment requirements
Loan Amount	\$100,000 - \$1,250,000 requirements
Loan to Value Ratio (LVR)	≤ 80% requirements
Loan Term	10 – 30 years requirements

	Key Attributes of the Products (continued)	Consistency with likely Objectives, Financial Situation & Requirements of the class of consumers in the target market
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 requirements: <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 requirements: <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 requirements.

Objectives, financial situation, and requirements

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

- Obtain an investment loan to purchase residential property within their super fund; or
- Arranging to refinance an existing limited recourse borrowing arrangement (LRBA)

Consumers may have additional requirements for their home loan including:

- 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

ORDE Financial 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;
- mortgage managers; and
- aggregators

Distribution conditions

The distribution channels and conditions are appropriate because:

- The Products have a wide target market;
- ORDE Financial conducts a full credit assessment on every loan application to ensure that the objectives, financial situation and requirements 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 arising 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 features 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. 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@ORDE.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@ORDE.com.au).

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"> • Skyblue Residential Home Loan (Full Doc & Alt Doc) • Skyblue 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

Australian Financial Holdings Pty Ltd may distribute this product to customers via an appropriately trained member of the Australian Financial Holdings 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;
- Australian Financial Holdings Pty Ltd 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 (Customer.Service@australianfinancial.com).

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 (Customer.Service@australianfinancial.com).