

# 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, General Terms & Conditions and Credit Guide issued to them before deciding whether to proceed.

<b>Product Name</b>	Commercial Loan (Full Doc & Alt Doc)
<b>Issuer</b>	ORDE Mortgage Custodian Pty Ltd ACN 638 083 548
<b>Servicer</b>	ORDE Financial Pty Limited ACN 634 779 990 (Australian Credit Licence 522079) ("ORDE")
<b>Reference Documents</b>	Loan Contract, General Terms & Conditions and Credit Guide
<b>Version</b>	2.0 – April 2024
<b>Cease Date</b>	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
<b>Security Type</b>	Commercial property held for Investment
<b>Loan Amount</b>	\$100,000 - \$2,500,000
<b>Loan to Value Ratio (LVR)</b>	≤ 75%
<b>Loan Term</b>	10 – 30 years

	<b>Key Attributes of the Products</b> (continued)	<b>Consistency with likely Objectives, Financial Situation &amp; Requirements of the class of consumers in the target market</b>
<b>Repayment Type</b>	<ul style="list-style-type: none"> <li>Principal &amp; Interest</li> <li>Interest only (Up to 5 years) reverting to Principal &amp; Interest</li> </ul>	<ul style="list-style-type: none"> <li>Consumers seeking Principal &amp; Interest repayments are likely to have one or more of the following requirements:               <ul style="list-style-type: none"> <li>The ability to minimise interest paid over the life of the loan</li> <li>The ability to build home equity from the commencement of the loan; and/or</li> <li>Seeking the lowest possible available interest rate</li> </ul> </li> <li>Consumers seeking Interest Only repayments are likely to have one or more of the following requirements:               <ul style="list-style-type: none"> <li>To follow advice of their financial advisor/accountant, or for taxation reasons; and/or</li> <li>Seeking to preserve cashflow by reducing their required repayments</li> </ul> </li> </ul>
<b>Repayment Frequency</b>	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.
<b>Interest Rate Type</b>	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"> <li>The ability to take advantage of potential future interest rate decreases</li> <li>The ability to make extra repayments to their loan; and/or</li> <li>Flexibility allowing early repayment of their loan</li> </ul>
<b>Account Management</b>	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:

<b>Initial review</b>	Within 12 months of the effective date.
<b>Periodic reviews</b>	At least every 12 months from the last review.
<b>Review triggers or events</b>	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"> <li>• a material change to the design features or distribution of the product, including related documentation;</li> <li>• occurrence of a significant dealing;</li> <li>• distribution conditions found to be inadequate;</li> <li>• external events such as adverse media coverage or regulatory attention; and</li> <li>• significant changes in metrics, including, but not limited to, complaints</li> </ul>

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](mailto: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](mailto:compliance@ORDE.com.au)).