

# Target Market Determination



## for True Blue Prime – Investment Fixed

### 1. Product

True Blue Prime – Investment Fixed with [optional] Visa Debit Card

### 2. Issuer

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

("Columbus/we/us")

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

### 3. Version No.

2021.2

### 4. Date effective

5 October 2021

### 5. About the TMD

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

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

### 6. Target Market

#### 6.1 Description of target market

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

- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - an Australian citizen or a permanent Australian resident;
- require a loan to purchase or refinance an investment property and who may also wish to release some of the equity in their property for other purposes such as to consolidate debt or to be used for personal or investment purposes;

# Target Market Determination



## for True Blue Prime – Investment Fixed

- require an offset account;
- require the use of a Visa Debit card;
- require the certainty of a fixed interest rate;
- are able to make up to \$20k of extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

The product meets the likely objectives, financial situation and needs of consumers in the target market because it provides them with the certainty of a fixed rate for an initial period of time, allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable up to \$20k additional per annum whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

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

This product may not be suitable for consumers who:

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

### 6.3 Description of the Product, including key attributes

- Fixed interest rate;
- Repayment options:
  - principle and interest; or
  - interest only
- Redraw available
- Able to make up to \$20k of extra repayments without penalty
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR:
  - 80% for Inner-City postcodes
  - 90% for Regional postcodes
  - 95% for Metro and Non-Metro postcodes
- Offset facility available
- Application fee is payable \$440
- Settlement fee is payable \$150
- Valuation fee is payable \$375 or at cost is a higher fee applies
- Ongoing fee is payable \$250 p.a.

## 7. Distribution Conditions/ Restrictions

# Target Market Determination



## for True Blue Prime – Investment Fixed

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

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

# Target Market Determination



## for True Blue Prime – Investment Fixed

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

Type of information	Description	Reporting period
Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware

# Target Market Determination



## for True Blue Prime – Investment Variable

### 1. Product

True Blue Prime – Investment Variable with [optional] Visa Debit Card

### 2. Issuer

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

("Columbus/we/us")

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

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2021.2

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### 6. Target Market

#### 6.1 Description of target market

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- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - an Australian citizen or a permanent Australian resident;
- require a loan to purchase or refinance an investment property and who may also wish to release some of the equity in their property for other purposes such as to consolidate debt or to be used for personal or investment purposes;

# Target Market Determination



## for True Blue Prime – Investment Variable

- require an offset account;
- require the use of a Visa Debit card;
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

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

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

This product may not be suitable for consumers who:

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

### 6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principle and interest; or
  - interest only
- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR:
  - 80% for Inner-City postcodes
  - 90% for Regional postcodes
  - 95% for Metro and Non-Metro postcodes
- **Offset facility available**
- **Application fee is payable \$440**
- **Settlement fee is payable \$150**
- **Valuation fee is payable \$375 or at cost if a higher fee is payable**
- **Ongoing fee is payable \$250**

## 7. Distribution Conditions/ Restrictions

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

# Target Market Determination



## for True Blue Prime – Investment Variable

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

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

## 9. Monitoring and reporting of this TMD

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

# Target Market Determination



## for True Blue Prime – Investment Variable

Type of information	Description	Reporting period
Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware



# Target Market Determination



## for True Blue SMSF – Investment Fixed

### 1. Product

True Blue SMSF – Investment Fixed

### 2. Issuer

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

("Columbus/we/us")

### 3. Version No.

2021.3

### 4. Date effective

5 October 2021

### 5. About the TMD

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### 6. Target Market

#### 6.1. Description of target market

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

- are:
  - Trustee of a Self-Managed Super Fund;
  - The SMSF Trustee must hold a beneficial interest in the security property and must have a right to acquire the property from the Property Trustee and is permitted to borrow in accordance with all relevant legislative requirements and any associated regulations; and

## for True Blue SMSF – Investment Fixed

- The Property Trustee, which holds the legal interest in the security property on trust for the SMSF, must meet all relevant legislative requirements and any associated regulations.
- require a loan to purchase or refinance an investment property as part of a Self-Managed Super Fund (SMSF);
- want an offset account;
- require the certainty of a fixed interest rate;
- are able to make up to \$20k of extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

The product meets the likely objectives, financial situation and needs of consumers in the target market because it provides them with the certainty of a fixed rate for an initial period of time, allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable up to \$20k additional per annum whilst maintaining the ability to deposit SMSF funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable whilst maintaining the flexibility of transferring funds from the Offset account back to the SMSF Cash Management Account. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

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

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are looking to purchase or refinance a residential owner occupied property; or
- are looking to construct a property

### 6.3. Description of the Product, including key attributes

- Fixed interest rate;
- Repayment options:
  - principal and interest; and
  - interest only.
- Able to make up to \$20k of extra repayments without penalty
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR: 80%
- Offset facility available is available by increasing rate by 0.30%
- Lenders Protection fee of 0.50% is payable over 75% LVR
- Valuation fee is payable \$375 or at cost if a higher fee applies
- Ongoing fee is payable \$395 p.a.

## 7. Distribution Conditions/ Restrictions

# Target Market Determination



## for True Blue SMSF – Investment Fixed

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

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

# Target Market Determination



## for True Blue SMSF – Investment Fixed

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

Type of information	Description	Reporting period
Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware

# Target Market Determination



## for True Blue SMSF – Investment Variable

### 1. Product

True Blue SMSF – Investment Variable

### 2. Issuer

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

("Columbus/we/us")

### 3. Version No.

2021.3

### 4. Date effective

5 October 2021

### 5. About the TMD

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### 6. Target Market

#### 6.1 Description of target market

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

- are:
  - Trustee of a Self-Managed Super Fund;
  - The SMSF Trustee must hold a beneficial interest in the security property and must have a right to acquire the property from the Property Trustee and is permitted to borrow in accordance with all relevant legislative requirements and any associated regulations; and

## for True Blue SMSF – Investment Variable

- The Property Trustee, which holds the legal interest in the security property on trust for the SMSF, must meet all relevant legislative requirements and any associated regulations.
- require a loan to purchase or refinance an investment property as part of a Self Managed Super Fund (SMSF);
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want an offset account;
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

Although variable interest rates fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to deposit SMSF funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable whilst maintaining the flexibility of transferring funds from the Offset account back to the SMSF Cash Management Account. This product also allows consumers to select interest only or principal and interest repayments to reduce their overall debt and build equity.

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

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are seeking the certainty of fixed repayments over the term of the loan; or
- are looking to construct a property;

### 6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principal and interest; and
  - interest only.
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR: 80%
- **Offset facility available by increasing the interest rate by 0.30%**
- **Lenders Protection fee applies of 0.50% applies over 75% LVR**
- **Valuation fee is payable of \$375 or at cost if a higher fee applies**
- **Ongoing fee is payable \$395 p.a.**

## 7. Distribution Conditions/ Restrictions

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

- Direct
  - Online

# Target Market Determination



## for True Blue SMSF – Investment Variable

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

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

Type of information	Description	Reporting period
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# Target Market Determination



## for True Blue SMSF – Investment Variable

Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware



# Target Market Determination



## for True Blue SMSF Commercial – Investment Fixed

### 1. Product

True Blue SMSF Commercial – Investment Fixed

### 2. Issuer

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

("Columbus/we/us")

### 3. Version No.

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### 6. Target Market

#### 6.1 Description of target market

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- are:
  - Trustee of a Self-Managed Super Fund;
  - The SMSF Trustee must hold a beneficial interest in the security property and must have a right to acquire the property from the Property Trustee and is permitted to borrow in accordance with all relevant legislative requirements and any associated regulations; and

## for True Blue SMSF Commercial – Investment Fixed

- The Property Trustee, which holds the legal interest in the security property on trust for the SMSF, must meet all relevant legislative requirements and any associated regulations.
- require a loan to purchase or refinance an investment property as part of a Self-Managed Super Fund (SMSF);
- want an offset account;
- require the certainty of a fixed interest rate;
- are able to make up to \$20k of extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

The product meets the likely objectives, financial situation and needs of consumers in the target market because it provides them with the certainty of a fixed rate for an initial period of time, allows them to deposit SMSF funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable up to \$20k additional per annum whilst maintaining the flexibility of transferring funds from the Offset account back to the SMSF Cash Management Account. This product also allows consumers to select interest only or principal and interest repayments to reduce their overall debt and build equity.

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

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are looking to purchase or refinance a residential owner occupied property; or
- are looking to construct a property

### 6.3 Description of the Product, including key attributes

- Fixed interest rate;
- Repayment options:
  - principal and interest only
- Able to make up to \$20k of extra repayments without penalty
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR: 80%
- Offset facility is available by increasing the interest rate by 0.30%
- Lenders Protection fee is payable at 0.50% for any LVR over 75%
- Valuation fee is payable at cost
- Ongoing fee is payable \$395 p.a.

## 7. Distribution Conditions/ Restrictions

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

- Direct

# Target Market Determination



## for True Blue SMSF Commercial – Investment Fixed

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

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- the product has a wide target market;
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Type of information	Description	Reporting period
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# Target Market Determination



## for True Blue SMSF Commercial – Investment Variable

### 1. Product

True Blue SMSF Commercial – Investment Variable

### 2. Issuer

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

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#### 6.1 Description of target market

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- are:
  - Trustee of a Self-Managed Super Fund;
  - The SMSF Trustee must hold a beneficial interest in the security property and must have a right to acquire the property from the Property Trustee and is permitted to borrow in accordance with all relevant legislative requirements and any associated regulations; and

## for True Blue SMSF Commercial – Investment Variable

- The Property Trustee, which holds the legal interest in the security property on trust for the SMSF, must meet all relevant legislative requirements and any associated regulations.
- require a loan to purchase or refinance a commercial investment property as part of a Self Managed Super Fund (SMSF);
- want an offset account;
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

Although variable interest rates fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to deposit SMSF funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable whilst maintaining the flexibility of transferring funds from the Offset account back to the SMSF Cash Management Account. This product also allows consumers to select interest only or principal and interest repayments to reduce their overall debt and build equity.

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

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are seeking the certainty of fixed repayments over the term of the loan; or
- are looking to construct a property

### 6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principal and interest; and
  - interest only.
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR: 70%
- Offset facility is available by increasing the interest rate by 0.30%
- Lenders Protection fee is payable at 0.50% for any LVR over 75%
- Valuation fee is payable at cost
- Ongoing fee is payable at \$395 p.a.

## 7. Distribution Conditions/ Restrictions

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

- Direct

# Target Market Determination



## for True Blue SMSF Commercial – Investment Variable

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

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

Type of information	Description	Reporting period
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# Target Market Determination



## for True Blue SMSF Commercial – Investment Variable

Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware



# Target Market Determination



## for True Blue Construction – Investment Fixed

### 1. Product

True Blue Construction – Investment Fixed

### 2. Issuer

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

("Columbus/we/us")

### 3. Version No.

2021.2

### 4. Date effective

5 October 2021

### 5. About the TMD

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

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

### 6. Target Market

#### 6.1 Description of target market

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

- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - an Australian citizen or a permanent Australian resident;
- require a loan build a new investment property, renovate or demolish and rebuild an investment property;
- Interest Only option available during construction phase (max 12 months) reverting to Principal & Interest.

# Target Market Determination



## for True Blue Construction – Investment Fixed

- require an offset account;
- require the certainty of a fixed interest rate;
- are able to make up to \$20k of extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

The product meets the likely objectives, financial situation and needs of consumers in the target market because it provides them with the certainty of a fixed rate for an initial period of time, allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable up to \$20k additional per annum whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

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

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are looking to purchase or refinance an existing residential owner occupied property;
- require the ability to provide alternative methods of income verification.

### 6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principal and interest; or
  - interest only
- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR:
  - 80% for Inner-City postcodes
  - 90% for Regional postcodes
  - 95% for Metro and Non-Metro postcodes
- Offset facility is available
- Application fee is payable of \$440
- Construction Admin fee is payable of \$750
- Valuation fee is payable of \$375 or at cost if a high fee applies, plus progress inspection fees
- Ongoing fee is payable of \$250

## 7. Distribution Conditions/ Restrictions

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

- Direct
  - Online

# Target Market Determination



## for True Blue Construction – Investment Fixed

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

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

Type of information	Description	Reporting period
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# Target Market Determination



## for True Blue Construction – Investment Fixed

Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware

# Target Market Determination



## for True Blue Construction – Investment Variable

### 1. Product

True Blue Construction – Investment Variable

### 2. Issuer

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

("Columbus/we/us")

### 3. Version No.

2021.2

### 4. Date effective

5 October 2021

### 5. About the TMD

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

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

### 6. Target Market

#### 6.1. Description of target market

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

- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - an Australian citizen or a permanent Australian resident;
- require a loan build a new investment home, renovate or demolish and rebuild an investment property;
- Interest Only option available during construction phase (max 12 months) reverting to Principal & Interest.

## for True Blue Construction – Investment Variable

- require an offset account;
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

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

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

This product may not be suitable for consumers who:

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

### 6.3. Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principle and interest; or
  - interest only
- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$1,750,000 (subject to LVR and postcode policy)
- Maximum LVR: 80%
- Offset facility is available
- Application fee is payable of \$440
- Construction Admin fee is payable of \$750
- Valuation fee is payable of \$375 or at cost if a higher fee applies plus progress inspection fees
- Ongoing fee is payable of \$250

## 7. Distribution Conditions/ Restrictions

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

- Direct
  - Online

# Target Market Determination



## for True Blue Construction – Investment Variable

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

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

Type of information	Description	Reporting period
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# Target Market Determination



## for True Blue Construction – Investment Variable

Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware



# Target Market Determination



## for True Blue Construction – Owner Occupied Fixed

### 1. Product

True Blue Construction – Owner Occupied Fixed

### 2. Issuer

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

("Columbus/we/us")

### 3. Version No.

2021.1

### 4. Date effective

5 October 2021

### 5. About the TMD

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

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

### 6. Target Market

#### 6.1 Description of target market

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

- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - an Australian citizen or a permanent Australian resident;
- require a loan build a new owner-occupied home, renovate or demolish and rebuild an owner-occupied property;
- Interest Only option available during construction phase (max 12 months) reverting to Principal & Interest.

# Target Market Determination



## for True Blue Construction – Owner Occupied Fixed

- require an offset account;
- require the certainty of a fixed interest rate;
- are able to make up to \$20k of extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

The product meets the likely objectives, financial situation and needs of consumers in the target market because it provides them with the certainty of a fixed rate for an initial period of time, allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable up to \$20k additional per annum whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

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

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are looking to purchase or refinance an existing residential owner occupied property;
- require the ability to provide alternative methods of income verification.

### 6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principle and interest; or
  - interest only
- Redraw available
- Visa Debit Card option
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR:
  - 80% for Inner-City postcodes
  - 90% for Regional postcodes
  - 95% for Metro and Non-Metro postcodes
- Offset facility is available
- Application fee is payable of \$440
- Construction Admin fee is payable of \$750
- Valuation fee is payable of \$375 or at cost if a higher fee applies, plus progress inspection fees
- Ongoing fee is payable of \$250 if the LVR exceeds 80%

## 7. Distribution Conditions/ Restrictions

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

# Target Market Determination



## for True Blue Construction – Owner Occupied Fixed

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

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

# Target Market Determination



## for True Blue Construction – Owner Occupied Fixed

Type of information	Description	Reporting period
Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware

# Target Market Determination



## for True Blue Construction – Owner Occupied Variable

### 1. Product

True Blue Construction – Owner Occupied Variable

### 2. Issuer

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

("Columbus/we/us")

### 3. Version No.

2021.2

### 4. Date effective

5 October 2021

### 5. About the TMD

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

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

### 6. Target Market

#### 6.1 Description of target market

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

- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - an Australian citizen or a permanent Australian resident;
- require a loan build a new owner-occupied home, renovate or demolish and rebuild an owner-occupied property;
- Interest Only option available during construction phase (max 12 months) reverting to Principal & Interest.

## for True Blue Construction – Owner Occupied Variable

- require an offset account;
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

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

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

This product may not be suitable for consumers who:

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

### 6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principle and interest; or
  - interest only
- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR:
  - 80% for Inner-City postcodes
  - 90% for Regional postcodes
  - 95% for Metro and Non-Metro postcodes
- Offset facility is available
- Application fee is payable of \$440
- Construction Admin fee is payable of \$750
- Valuation fee is payable of \$375 or at cost if a higher fee is applicable plus progressive inspection fees
- Ongoing fee is payable of \$250 if the LVR exceeds 80%

## 7. Distribution Conditions/ Restrictions

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

- Direct

# Target Market Determination



## for True Blue Construction – Owner Occupied Variable

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

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

Type of information	Description	Reporting period
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# Target Market Determination



## for True Blue Construction – Owner Occupied Variable

Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware



# Target Market Determination



## for True Blue Prime – Owner Occupier Fixed

### 1. Product

True Blue Prime – Owner Occupier Fixed with [optional] Visa Debit Card

### 2. Issuer

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

("Columbus/we/us")

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

### 3. Version No.

2021.2

### 4. Date effective

5 October 2021

### 5. About the TMD

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

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

### 6. Target Market

#### 6.1 Description of target market

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

- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - an Australian citizen or a permanent Australian resident;
- require a loan to purchase or refinance an owner-occupied property and who may also wish to release some of the equity in their property for other purposes such as to consolidate debt or to be used for personal or investment purposes;

# Target Market Determination



## for True Blue Prime – Owner Occupier Fixed

- require an offset account;
- require the use of a Visa Debit card;
- require the certainty of a fixed interest rate;
- are able to make up to \$20k of extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

The product meets the likely objectives, financial situation and needs of consumers in the target market because it provides them with the certainty of a fixed rate for an initial period of time, allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable up to \$20k additional per annum whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

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

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are looking to purchase or refinance a residential investment property;
- are looking to construct a property; or
- require the ability to provide alternative methods of income verification.

### 6.3 Description of the Product, including key attributes

- Fixed interest rate;
- Repayment options:
  - principal and interest; or
  - interest only
- Redraw available
- Able to make up to \$20k of extra repayments without penalty
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR:
  - 80% for Inner-City postcodes
  - 90% for Regional postcodes
  - 95% for Metro and Non-Metro postcodes
- Offset facility available
- Application fee is payable of \$440
- Valuation fee is payable of \$375 or at cost if a higher fee is applicable
- Ongoing fee is payable of \$250 if the LVR exceeds 80%

## 7. Distribution Conditions/ Restrictions

# Target Market Determination



## for True Blue Prime – Owner Occupier Fixed

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

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

# Target Market Determination



## for True Blue Prime – Owner Occupier Fixed

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

Type of information	Description	Reporting period
Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware

# Target Market Determination



## for True Blue Prime – Owner Occupier Variable

### 1. Product

True Blue Prime – Owner Occupier Variable with [optional] Visa Debit Card

### 2. Issuer

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

("Columbus/we/us")

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

### 3. Version No.

2021.2

### 4. Date effective

5 October 2021

### 5. About the TMD

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

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

### 6. Target Market

#### 5.1 Description of target market

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

- are:
  - at least 18 years old;
  - individual borrowers (as single or joint borrowers); and
  - an Australian citizen or a permanent Australian resident;
- require a loan to purchase or refinance an owner-occupied property and who may also wish to release some of the equity in their property for other purposes such as to consolidate debt or to be used for personal or investment purposes;

# Target Market Determination



## for True Blue Prime – Owner Occupier Variable

- require an offset account;
- require the use of a Visa Debit card;
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;

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

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

This product may not be suitable for consumers who:

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

### 5.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
  - principal and interest; or
  - interest only
- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR:
  - 80% for Inner-City postcodes
  - 90% for Regional postcodes
  - 95% for Metro and Non-Metro postcodes
- Offset facility available
- Application fee is payable of \$440
- Valuation fee is payable of \$375 or at cost if a higher fee applies
- Ongoing fee is payable of \$250 if the LVR exceeds 80%

## 7. Distribution Conditions/ Restrictions

# Target Market Determination



## for True Blue Prime – Owner Occupier Variable

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

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

The distribution channels and conditions are appropriate because:

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

## 8. TMD Reviews

We will review this TMD as follows:

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

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

## 9. Monitoring and reporting of this TMD

# Target Market Determination



## for True Blue Prime – Owner Occupier Variable

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

Type of information	Description	Reporting period
Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware



# Target Market Determination

## for SMSF – Fixed Investment Product



<b>Product</b>	SMSF –Fixed Investment
<b>Product Manager</b>	Columbus Capital Pty Ltd ACN 119 531 252, Australian Financial Services Licence and Australian Credit Licence 337303
<b>Issuer</b>	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited (ACN 000 341 533), Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242;</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794;</li> <li>(f) SQL Funding Pty Ltd ACN 629 498 095; and</li> <li>(g) Origin CF Pty Ltd ACN 621 866 304,</li> </ul> <p>to be referred to as (Columbus/we/us).</p>
<b>Effective Date of TMD</b>	1 <sup>st</sup> June 2022
<b>TMD Version</b>	2022.1

### PRODUCT DESCRIPTION AND KEY ATTRIBUTES

Product Features	SMSF Investment	SMSF NDIS Investment	SMSF Commercial Investment
<b>Interest Rate Type</b>	Fixed	Fixed	Fixed
<b>Repayment Options</b>	Principal and Interest or Interest only for an agreed period.	Principal and Interest only	Principal and Interest or Interest Only for a period
<b>Redraw</b>	No	No	No
<b>Minimum Loan Size</b>	\$50,000	\$50,000	\$50,000
<b>Maximum Loan Size (Subject to LVR and postcode policy)</b>	\$3,000,000	\$1,250,000	\$3,000,000
<b>Maximum LVR (Subject to postcode eligibility criteria)</b>	80%	80%	80%
<b>Additional repayments without penalty</b>	Yes up to \$20k per annum	Yes up to \$20k per annum	Yes up to \$20k per annum
<b>Offset facility</b>	Yes	Yes	Yes

Fees – Application fee is payable. Other fees like Settlement Fees, Valuation Fees, Offset Account Fees, Ongoing Fees, Late Payment Fees may also apply

### TARGET MARKET DESCRIPTION

<b>About this TMD</b>	<p>This Target Market Determination (<b>TMD</b>) document describes the class of consumers that Columbus has designed this product for, being the target market and the conditions (if any) around how the product is distributed to consumers. When considering the target market, Columbus focused on our consumer target market's objectives and needs.</p> <p>This TMD is not intended to provide you with financial advice nor is it a substitute for the product's terms and conditions or other disclosure documents. Please refer to</p>
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# Target Market Determination

## for SMSF – Fixed Investment Product



	our Terms and Conditions and Credit Guide before deciding product suitability. Our product terms and conditions will be provided to you upon request.
<b>Description of the target market</b>	<p>The features of this product have been assessed as meeting the likely objectives, financial situation and needs of consumers who:</p> <ul style="list-style-type: none"> <li>▪ have a registered and compliant Self-Managed Super Fund (<b>SMSF</b>) and are: <ul style="list-style-type: none"> <li>- Trustee of a SMSF;</li> <li>- The SMSF Trustee must hold a beneficial interest in the security property and must have a right to acquire the property from the Property Trustee and is permitted to borrow in accordance with all relevant legislative requirements and any associated regulations; and</li> <li>- The Property Trustee, which holds the legal interest in the security property on trust for the SMSF, must meet all relevant legislative requirements and any associated regulations;</li> </ul> </li> <li>▪ require a loan to purchase or refinance a SMSF investment property where the property type is either residential, commercial or NDIS (SDA Approved) property;</li> <li>▪ require an offset account;</li> <li>▪ require the certainty of a fixed interest rate;</li> <li>▪ require the ability to make up to \$20k per annum of extra repayments without penalty;</li> <li>▪ interest only repayments for an agreed period of time or principal and interest repayments; and</li> <li>▪ satisfy our eligibility criteria;</li> </ul> <p>The financial situation of the Target Market are consumers that meet our credit assessment criteria which includes demonstrating serviceability of the loan, the capacity to make the required repayments and the ability to pay off the loan without substantial hardship. Upon application Columbus will undertake an assessment to determine the consumer's ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.</p>
<b>Ineligible consumers</b>	<p>This product may not be suitable for consumers who:</p> <ul style="list-style-type: none"> <li>▪ do not meet the eligibility requirements;</li> <li>▪ are seeking the flexibility of a variable interest rate;</li> <li>▪ require the ability to make more than \$20k per annum of extra repayments;</li> <li>▪ are looking to purchase an owner occupied property;</li> <li>▪ are looking to purchase a property that will not be part of their SMSF; or</li> <li>▪ are looking to construct a property.</li> </ul>
<b>DISTRIBUTION CONDITIONS</b>	
<b>Distribution Channels</b>	<p>Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:</p> <ul style="list-style-type: none"> <li>▪ Direct <ul style="list-style-type: none"> <li>- Online</li> <li>- By phone</li> <li>- In person (e.g. branch, agency, or premises visit)</li> </ul> </li> <li>▪ Third party – Accredited mortgage brokers subject to their Best Interests Duty (<b>BID</b>) obligations</li> </ul> <p>The distribution channels and conditions are appropriate because:</p> <ul style="list-style-type: none"> <li>▪ the product has a wide target market;</li> </ul>

# Target Market Determination

## for SMSF – Fixed Investment Product



	<ul style="list-style-type: none"> <li>▪ our staff have the necessary training, knowledge and accreditation (if required) to assess whether the consumer is within the target market, all of our staff must continually satisfy annual compliance reviews.</li> <li>▪ we rely on existing distributors, methods, controls and supervision already in place;</li> <li>▪ our approval system has checks and controls in place to flag applicants who may be outside the target market; and</li> <li>▪ accredited mortgage brokers are subject to BID to ensure that the product is in the best interests of the particular consumer.</li> </ul>
<b>Distribution conditions</b>	<p>A distributor must:</p> <ul style="list-style-type: none"> <li>▪ Hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee; and</li> <li>▪ Comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager.</li> </ul> <p>This condition ensures distributors are appropriately authorised to provide the relevant regulated financial services and will comply with the commercial terms agreed between the distributor and Product Manager.</p> <p>This condition applies to all conduct by the distributor.</p>

### TMD REVIEWS

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

<b>Initial review</b>	Within 12 months of the date of this TMD
<b>Periodic review</b>	Each year on the anniversary of this TMD.
<b>Review triggers</b>	<p>Specific events will prompt Columbus to review this TMD, which includes:</p> <ul style="list-style-type: none"> <li>▪ A significant dealing of the product to consumers outside the target market occurs;</li> <li>▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance;</li> <li>▪ A significant number of material complaints are received from consumers in relation to the product;</li> <li>▪ Unexpected early stage arrears are detected;</li> <li>▪ A significant number of defaults occur;</li> <li>▪ A significant breach has occurred in connection with the issuing and distribution of this product;</li> <li>▪ A significant number of late repayments are being recorded;</li> <li>▪ A material change is made to this product;</li> <li>▪ Evidence that the product or distributor conduct are significantly different to the target market; or</li> <li>▪ The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul> <p>If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.</p>

# Target Market Determination

## for SMSF – Fixed Investment Product



<b>DISTRIBUTOR REPORTING REQUIREMENTS</b>		
The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:		
<b>Type of information</b>	<b>Description</b>	<b>Reporting period</b>
<b>Complaints</b>	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint	As soon as practicable and within 10 business days following the end of a calendar quarter
<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
<b>Feedback</b>	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware
<b>Information requested</b>	Any other information requested by the Product Manager	As soon as practicable, and in any case within 10 business days after receiving such request

# Target Market Determination for SMSF – Variable Investment Product



<b>Product</b>	SMSF –Variable Investment
<b>Product Manager</b>	Columbus Capital Pty Ltd ACN 119 531 252, Australian Financial Services Licence and Australian Credit Licence 337303
<b>Issuer</b>	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited (ACN 000 341 533), Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242;</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794;</li> <li>(f) SQL Funding Pty Ltd ACN 629 498 095; and</li> <li>(g) Origin CF Pty Ltd ACN 621 866 304,</li> </ul> <p>to be referred to as (Columbus/we/us).</p>
<b>Effective Date of TMD</b>	1 <sup>st</sup> June 2022
<b>TMD Version</b>	2022.1

## PRODUCT DESCRIPTION AND KEY ATTRIBUTES

Product Features	SMSF Investment	SMSF NDIS Investment	SMSF Commercial Investment
<b>Interest Rate Type</b>	Variable	Variable	Variable
<b>Repayment Options</b>	Principal and Interest or Interest only for an agreed period.	Principal and Interest only	Principal and Interest or Interest Only for a period
<b>Redraw</b>	Yes	Yes	Yes
<b>Minimum Loan Size</b>	\$50,000	\$50,000	\$50,000
<b>Maximum Loan Size (Subject to LVR and postcode policy)</b>	\$3,000,000	\$1,250,000	\$3,000,000
<b>Maximum LVR (Subject to postcode eligibility criteria)</b>	80%	80%	80%
<b>Additional repayments without penalty</b>	Yes	Yes	Yes
<b>Offset facility</b>	Yes	Yes	Yes

Fees – Application fee is payable. Other fees like Settlement Fees, Valuation Fees, Offset Account Fees, Ongoing Fees, Late Payment Fees may also apply

## TARGET MARKET DESCRIPTION

<b>About this TMD</b>	<p>This Target Market Determination (<b>TMD</b>) document describes the class of consumers that Columbus has designed this product for, being the target market and the conditions (if any) around how the product is distributed to consumers. When considering the target market, Columbus focused on our consumer target market's objectives and needs.</p> <p>This TMD is not intended to provide you with financial advice nor is it a substitute for the product's terms and conditions or other disclosure documents. Please refer to</p>
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# Target Market Determination

## for SMSF – Variable Investment Product



	our Terms and Conditions and Credit Guide before deciding product suitability. Our product terms and conditions will be provided to you upon request.
<b>Description of the target market</b>	<p>The features of this product have been assessed as meeting the likely objectives, financial situation and needs of consumers who:</p> <ul style="list-style-type: none"> <li>▪ have a registered and compliant Self-Managed Super Fund (<b>SMSF</b>) and are: <ul style="list-style-type: none"> <li>- Trustee of a SMSF;</li> <li>- The SMSF Trustee must hold a beneficial interest in the security property and must have a right to acquire the property from the Property Trustee and is permitted to borrow in accordance with all relevant legislative requirements and any associated regulations; and</li> <li>- The Property Trustee, which holds the legal interest in the security property on trust for the SMSF, must meet all relevant legislative requirements and any associated regulations;</li> </ul> </li> <li>▪ require a loan to purchase or refinance a SMSF investment property where the property type is either residential, commercial or NDIS (SDA Approved) property;</li> <li>▪ require an offset account;</li> <li>▪ require the flexibility of a variable interest rate;</li> <li>▪ require the ability to make additional extra repayments without penalty;</li> <li>▪ interest only repayments for an agreed period of time or principal and interest repayments; and</li> <li>▪ satisfy our eligibility criteria;</li> </ul> <p>The financial situation of the Target Market are consumers that meet our credit assessment criteria which includes demonstrating serviceability of the loan, the capacity to make the required repayments and the ability to pay off the loan without substantial hardship. Upon application Columbus will undertake an assessment to determine the consumer's ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.</p>
<b>Ineligible consumers</b>	<p>This product may not be suitable for consumers who:</p> <ul style="list-style-type: none"> <li>▪ do not meet the eligibility requirements;</li> <li>▪ are seeking the certainty of fixed interest rate over a period of time;</li> <li>▪ are looking to purchase an owner occupied property;</li> <li>▪ are looking to purchase a property that will not be part of their SMSF; or</li> <li>▪ are looking to construct a property.</li> </ul>
<b>DISTRIBUTION CONDITIONS</b>	
<b>Distribution Channels</b>	<p>Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:</p> <ul style="list-style-type: none"> <li>▪ Direct <ul style="list-style-type: none"> <li>- Online</li> <li>- By phone</li> <li>- In person (e.g. branch, agency, or premises visit)</li> </ul> </li> <li>▪ Third party – Accredited mortgage brokers subject to their Best Interests Duty (<b>BID</b>) obligations</li> </ul> <p>The distribution channels and conditions are appropriate because:</p> <ul style="list-style-type: none"> <li>▪ the product has a wide target market;</li> </ul>

# Target Market Determination for SMSF – Variable Investment Product



	<ul style="list-style-type: none"> <li>our staff have the necessary training, knowledge and accreditation (if required) to assess whether the consumer is within the target market, all of our staff must continually satisfy annual compliance reviews.</li> <li>we rely on existing distributors, methods, controls and supervision already in place;</li> <li>our approval system has checks and controls in place to flag applicants who may be outside the target market; and</li> <li>accredited mortgage brokers are subject to BID to ensure that the product is in the best interests of the particular consumer.</li> </ul>
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<b>Distribution conditions</b>	<p>A distributor must:</p> <ul style="list-style-type: none"> <li>Hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee; and</li> <li>Comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager.</li> </ul> <p>This condition ensures distributors are appropriately authorised to provide the relevant regulated financial services and will comply with the commercial terms agreed between the distributor and Product Manager.</p> <p>This condition applies to all conduct by the distributor.</p>
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## TMD REVIEWS

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

<b>Initial review</b>	Within 12 months of the date of this TMD
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<b>Periodic review</b>	Each year on the anniversary of this TMD.
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<b>Review triggers</b>	<p>Specific events will prompt Columbus to review this TMD, which includes:</p> <ul style="list-style-type: none"> <li>A significant dealing of the product to consumers outside the target market occurs;</li> <li>Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance;</li> <li>A significant number of material complaints are received from consumers in relation to the product;</li> <li>Unexpected early stage arrears are detected;</li> <li>A significant number of defaults occur;</li> <li>A significant breach has occurred in connection with the issuing and distribution of this product;</li> <li>A significant number of late repayments are being recorded;</li> <li>A material change is made to this product;</li> <li>Evidence that the product or distributor conduct are significantly different to the target market; or</li> <li>The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul> <p>If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.</p>
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## DISTRIBUTOR REPORTING REQUIREMENTS

# Target Market Determination

## for SMSF – Variable Investment Product



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

Type of information	Description	Reporting period
<b>Complaints</b>	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint	As soon as practicable and within 10 business days following the end of a calendar quarter
<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
<b>Feedback</b>	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware
<b>Information requested</b>	Any other information requested by the Product Manager	As soon as practicable, and in any case within 10 business days after receiving such request