

## **Target Market Determination**

## **Line of Credit**

#	Criteria	Responses for this Product		
Α	Entity responsible for preparing this TMD	Greater Bank, part of Newcastle Greater Mutual Group Ltd ACN 087 651 992 AFSL/Australian credit licence 238273		
В	Date this TMD is made	5 October 2023		
С	Greater Bank product name	Line of Credit  For product description see <u>Line of Credit</u>		
D	Product features	Key features		
		<ul> <li>A revolving line of credit secured by residential property or by a Term Investment held with Greater Bank.</li> <li>Provides customers with flexibility to withdraw funds</li> </ul>		
		when they need them up to the facility limit without approval of Bank.		
		Loan secured against residential property located in NSW, ACT and QLD.		
		Borrowings permitted up to 90% of LVR with Lenders     Mortgage Insurance (LMI), or 80% without LMI		
		Purpose of loan may include reasonable personal purposes.		
		Interest is only charged on actual daily balance.		
		Minimum loan amount is \$30,000 where secured by real property but no minimum applies where Line of Credit is secured by Greater Bank Term Investment.		
		A \$500 establishment fee.		
		Monthly facility fee of \$10.00 / mth.		
		Repayments are accepted at any time and made available to be drawn again. No set repayment schedule is established and the interest can be capitalised into the debt provided the debt does not exceed the limit.		
E	Key Attributes and other features	Key Attributes		
		Line of Credit facilities attract a variable rate of interest.		
		Card access is available on Greater Bank Line of Credit facilities.		
		No required repayment schedule is established, with interest able to be added to the debt in the facility.		
		Line of Credit facilities may carry a credit balance and will attract the same credit interest structure as the Access account.		

#	Criteria	Responses for this Product		
		No Transaction fees apply to Line of Credit facilities although Service charges may apply.		
F	Knowledge and experience	Basic – mass marketed product of low complexity/ risk profile.		
1	Description of the retail class that comprises the target market (s 994B(5)(b) of the Corporations Act)	Customers seeking a secured facility to finance a personal need without committing to a scheduled repayment structure.		
		Customers seeking freedom to draw funds from the approved limit at their discretion without approval of each drawing by Greater Bank.		
		Customers who:		
		are willing to accept the risk that their interest rate may go up or down over the life of the facility generally in line with interest rate fluctuations in the market.		
		may require flexibility, such as unlimited early repayments and paying out the loan without incurring additional costs and/or progressive drawdown.		
		may require the convenience of card access to pay for items immediately at point of sale.		
		may require ability to draw cash to spend at their discretion.		
2	Negative target market	Line of Credits are not suitable for:		
		Customers who are seeking a reverse mortgage to release equity from their residential property.		
		Potential borrowers looking to fund business operations.		
		Potential borrowers seeking the lowest cost of financing a significant purchase such as a residential property where the premium applicable in rate is not offset by the flexibility of drawing the funds at customers discretion and the lack of a set repayment structure.		
3	Description of distribution conditions and restrictions (s 994B(5)(c) of the Corporations Act)	New Line of Credit Facilities have been temporarily withdrawn from sale as of 8 <sup>th</sup> August 2022 due to system changes involved in our migration between two core banking systems.		
		Distribution Conditions in relation to permitted channels		
		Line of Credits can only be issued through the following channels:		
		Branches and Centres operated by Greater Bank		
		Mobile Lenders		
		Distribution Conditions in relation to staff who are 'regulated persons'		
		Line of Credits can only be issued by accredited Greater Bank Lenders who:		
		are trained and accredited to carry out the relevant suitability assessment processes and issue Line of Credits;		
		have successfully completed the Lending Capability     Accreditation Program; and		

#	Criteria	Responses for this Product		
		annually complete the Continuing Professional     Development program to retain their accreditation.		
		Distribution Conditions in relation to processes		
		Line of Credits are issued following the application of Greater Bank's relevant suitability assessment processes, which may include (but are not limited to):		
		<ul> <li>completion of a loan application via interview or online application form;</li> </ul>		
		<ul> <li>verification of the customer's identity and income/ expense information;</li> </ul>		
		<ul> <li>assessment of the customer's ability to repay the loan and the suitability of the security offered;</li> </ul>		
		<ul> <li>loan offered to the customer, with or without additional conditions (or application declined if the loan is not suitable); and</li> </ul>		
		<ul> <li>acceptance of the loan offer and signing of the credit contract by the customer.</li> </ul>		
		<ul> <li>Greater Bank Line of Credits are not distributed via intermediaries such as brokers, introducers or comparison websites.</li> </ul>		
		<ul> <li>Comparison sites and 3<sup>rd</sup> Parties may act as Referrers to Greater Bank</li> </ul>		
4	Review triggers (events and circumstances that reasonably suggest that the determination is no longer appropriate) (s 994B(5)(d) of the Corporations Act)	Greater Bank monitors the following indicators to determine if an event or circumstance reasonably suggests that the determination is no longer appropriate:  Internal decisions to materially amend or modify the product, its features and/or its distribution, including		
		changes to pricing.		
		Regulatory change that materially impacts the manufacture or sale of this product, and material customer remediation events and incidents in relation to this product.		
		<ul> <li>Any distribution or sales activity, outside the TMD or to ineligible customers, that meets the definition of a significant dealing.</li> </ul>		
		A material change in the nature and number of customer complaints and underlying complaint trends.		
5	Maximum period from the start of the day the determination is made to the start of the day the first review of the determination is to finish (s 994B(5)(e) of the Corporations Act)	24 months		
6	Maximum period from the date the previous review finished to the start of the day the next review of the determination is to be undertaken (s 994B(5)(f) of the Corporations Act)	24 months		

#	Criteria	Responses for this Product					
7	Reporting period for reporting information about the number of complaints about the product received (s 994B(5)(g) of the Corporations Act)	Monthly					
8	Specify the kinds of information needed to enable prompt identification of whether a review trigger, or another event or circumstance that would reasonably suggest that the determination is no longer appropriate, has occurred (s 994B(5)(h) of the Corporations Act) and for each type of information, specify:		Third party distributors of this product should provide the following to Greater Bank in writing:				
			Туре	Information Required	Frequency and timeframe		
		_	details of any complaints received  Timefine Within received the end complaints relevon received within reports	Frequency: Monthly  Timeframe:			
	- the regulated persons are required to report the information to Greater Bank; and - a reporting period for reporting			complaints	Within 10 days of the end of the relevant reporting period.		
	- a reporting period for reporting the information under section 994F(5) of the Corporations Act.		Significant dealings	- Details of the dealing (including any steps taken by the distributor in relation to the dealing)	Timeframe: Within 10 days of becoming aware of such a dealing.		
				- Date of the dealing			
				- Factors considered when determining dealing as "significant"			
				- Means through which dealing was identified			
			Distribution outside the target market (to the extent the distributor is aware of such dealings).	- All written details relating to the distribution - Reason distribution occurred outside Target Market occurred.	Timeframe: Within 10 days of becoming aware of such a dealing.		