

# Complete Home Loan

## Target Market Determination

12 August 2022

<b>Issuer</b>	Victoria Teachers Limited, ABN 44 087 651 769, AFSL and Australian Credit Licence 240 960, trading as Bank First
<b>Target Market</b>	<p><b>Description of target market (including likely objectives, financial situation and needs of the consumer)</b></p> <p><b>Owner occupiers</b></p> <p>Retail clients who:</p> <ul style="list-style-type: none"><li>• are seeking a loan to construct, purchase or renovate a home or refinance an existing home loan</li><li>• are aged 18 years or more and meet the credit assessment criteria for the product</li><li>• are willing and able to offer a first registered mortgage over real property (or other acceptable security) as security for the loan</li></ul> <p><b>Investors</b></p> <p>Retail clients who:</p> <ul style="list-style-type: none"><li>• are seeking a loan to construct, purchase or renovate an investment property or refinance an investment loan</li><li>• are aged 18 years or more and meet the credit assessment criteria for the product</li><li>• are willing and able to offer a first registered mortgage over real property (or other acceptable security) as security for the loan</li></ul> <p><b>Variable Rate Loans</b></p> <ul style="list-style-type: none"><li>• need the flexibility to make additional repayments</li><li>• need the facility to redraw advance repayments</li><li>• need a Home Loan offset account</li></ul> <p><b>Fixed Rate Loans</b></p> <ul style="list-style-type: none"><li>• need the certainty of a fixed interest rate and fixed repayments for a set period of time</li><li>• need the facility to redraw advance repayments</li><li>• do not need mortgage offset account</li></ul> <p><b>Interest only loans – usually only if investment/construction/bridging</b></p> <ul style="list-style-type: none"><li>• need an interest only period for tax planning reasons, to complete the construction of a home before commencing principal and interest repayments, or, whilst selling other property to enable repayment of the loan</li></ul> <p><b>Principal &amp; Interest</b></p> <ul style="list-style-type: none"><li>• need to make regular repayments of interest and principal over the term of the loan</li></ul>

<p><b>Target Market - continued</b></p>	<p>This is a Home Loan secured over real property. The key attributes are:</p> <ul style="list-style-type: none"> <li>• no minimum loan amount for variable rate loans</li> <li>• minimum loan amount of \$50,000 for fixed rates loans</li> <li>• loan terms of up to 30 years</li> <li>• interest only, principal and interest, or a combination</li> <li>• interest rate variable, fixed or a combination</li> <li>• repayment frequency can be weekly, fortnightly or monthly (monthly only on Interest Only loans)</li> <li>• ability to make additional repayments on a variable rate loan with no cost</li> <li>• ability to make up to \$30,000 p.a. in additional repayments during the fixed rate period without incurring a break cost; additional repayments will incur a break cost</li> <li>• a redraw facility to redraw advance repayments</li> <li>• must provide a registered first mortgage over real property or other acceptable security</li> </ul>									
<p><b>Distribution Conditions</b></p>	<p><b>Distribution conditions</b></p> <p>This product is distributed by the issuer through the following channels:</p> <ul style="list-style-type: none"> <li>• branches</li> <li>• mobile lenders</li> <li>• relationship officers</li> <li>• call centre</li> <li>• online</li> <li>• mortgage brokers</li> </ul> <p>Distribution conditions for this product include:</p> <ul style="list-style-type: none"> <li>• ensuring that customers meet the eligibility conditions for the product</li> <li>• ensuring that distribution through the above channels is by appropriately trained staff</li> </ul> <p>There are no other distributors for this product.</p> <p><b>Why the distribution conditions and restrictions will make it more likely that the consumers who acquire the product are in the target market</b></p> <p>Home Loan products issued by Bank First are simple, well understood, and suitable for the vast bulk of our customers.</p> <p>The nature of Home Loans issued by Bank First means that distribution through all of its usual channels, including mortgage brokers, will generally be appropriate.</p> <p>The distribution conditions will enable the product to reach consumers in the target market while providing relevant and sufficient information about the product through the distribution channels. Eligibility requirements are enforced in each distribution channel to ensure that only eligible consumers can acquire the product.</p>									
<p><b>Review Triggers</b></p>	<p>The review triggers that would reasonably suggest that the TMD is no longer appropriate include:</p> <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 is received from customers in relation to their purchase or use of the product that reasonably suggests that the TMD is no longer appropriate</li> <li>• a material change to the product or the terms and conditions of the product occurs which would cause the TMD to no longer be appropriate</li> </ul>									
<p><b>Review Periods</b></p>	<p><b>First review date:</b> 30 September 2022</p> <p><b>Periodic reviews:</b> Every 2 years after the initial and each subsequent review</p>									
<p><b>Distribution Information Reporting Requirements</b></p>	<p>The following information must be provided to Bank First by distributors who engage in retail product distribution conduct in relation to this product:</p> <table border="1" data-bbox="379 1794 1506 2074"> <thead> <tr> <th>Type of information</th> <th>Description</th> <th>Reporting period</th> </tr> </thead> <tbody> <tr> <td>Complaints</td> <td>Number of complaints Summary of each complaint including nature of complaint, resolution undertaken and customer outcome</td> <td>Every 3 months</td> </tr> <tr> <td>Significant dealing(s)</td> <td>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)</td> <td>As soon as practicable, and in any case within 10 business days after becoming aware</td> </tr> </tbody> </table>	Type of information	Description	Reporting period	Complaints	Number of complaints Summary of each complaint including nature of complaint, resolution undertaken and customer outcome	Every 3 months	Significant dealing(s)	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
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**Distribution  
Information  
Reporting  
Requirements -  
*continued***

<b>Type of information</b>	<b>Description</b>	<b>Reporting period</b>
A significant increase in customers who fall into arrears or hardship within first 12 months of drawdown	Number of customers	Every 12 months