

# Target Market Determination

## 1. Target Market Determination - Visa Debit Card

The Visa debit card (**Visa Debit Card**) attached to your Columbus Capital loan product is a financial product for the purposes of the design and distribution obligations set out in Part 7.8A of the *Corporations Act 2001* (Cth).

The purpose of this Target Market Determination is to provide consumers information about the Visa Debit Card's key attributes, the target market for the card, and the distribution and monitoring arrangements between the issuer, Indue Limited and the distributor and product manager, Columbus Capital Pty Ltd ABN 51 119 252 (**ColCap**) (Australian Financial Services Licence and Australian Credit Licence 337303).

The loan product will be issued by a Lender which will be named in the loan agreement and these products are managed and serviced by ColCap. The loan product could be issued by any of the Lenders named below:

- (a) Perpetual Corporate Trust Limited (ACN 000 341 533);
- (b) Pioneer First Australia Pty Limited ACN 086 092 613;
- (c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;
- (d) Origin Money Pty Ltd ACN 621 866 242;
- (e) Origin Mortgages Pty Ltd ACN 629 566 794;
- (f) SQL Funding Pty Ltd ACN 629 498 095; and
- (g) Origin CF Pty Ltd ACN 621 866 304.

This document is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. You should refer to the Terms and Conditions of the Visa Debit Card available at [www.originmms.com.au](http://www.originmms.com.au) when making a decision about this product.

**Date from which this Target Market Determination is effective 11 May 2022.**

## 2. Target Market

The information below summarises the overall class of consumers that fall within the target market for the Visa Debit Card, based on the product key attributes and the objectives, financial situation and needs that it has been designed to meet. This product is targeted at customers with an eligible ColCap loan product who want to access funds held in an eligible linked account using a variety of methods.

### (a) Class of consumers that fall within the target market

The Visa Debit Card is for those who have an eligible loan product from ColCap and are looking for a way to access money from their loan product account or the offset account, which is a sub-account of the loan product account using a variety of methods. The Visa Debit Card is not offered as a standalone product.

# Target Market Determination

## (b) Description of the Visa Debit Card and its key attributes

The key attributes of the Visa Debit Card are that:

- It can be used at any merchant that accepts Visa.
- It can be used to access money from a loan product (or from the offset account of a loan product) using one or more of the following methods:
  - Electronic Point of Sale (EFTPOS);
  - ATMs; and
  - Online.
- The ability to use the Visa Debit Card to withdraw cash is available only at ATMs and not at point of sale (EFTPOS).
- It can only be used by the person named on the Visa Debit Card and the Visa Debit Card is not transferrable.
- Transaction limits apply to the Visa Debit Card usage.

Fees and charges apply. Please refer to the terms and conditions of the card at [www.originmms.com.au](http://www.originmms.com.au). The Visa Debit Card may drive fees associated with the loan product, including payment of interest. These fees and charges are documented in the loan product agreement you have with the Lender.

## (c) Excluded class of consumers

The Visa Debit Card has not been designed for anyone who does not have an eligible loan product from ColCap.

## (d) Consistency between target market and Likely objectives, financial situation and needs

The Visa Debit Card is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as:

- It can only be linked to an eligible loan product from ColCap;
- identification and verification checks are undertaken on the cardholder by ColCap;
- ColCap has processes and procedures in place to ensure that loan products are only provided to consumers who meet the relevant loan product eligibility and are suitable based on product credit assessment criteria; and
- the Visa Debit Card has controls in place to ensure it can only be used to purchase items up to the value of available funds in the loan or offset sub-account.

## (e) Eligibility Criteria for the product

- Be over 18 years of age; and
- Have an eligible ColCap loan product.

# Target Market Determination

## 3. Distribution Conditions and Restrictions

### (a) Distribution channels

The Visa Debit Card is designed to be distributed to consumers through the following means:

- third parties who ColCap contracts with that:
  - hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;
  - comply with the terms and conditions of any relevant distribution agreement or arrangement with ColCap.
- ColCap brokers subject to their Best Interests Duty (BID) obligations, through ColCap’s broker distribution channel – Granite Home Loans;
- ColCap mortgage managers through ColCap’s wholesale funding channel – Origin Mortgage Management Services; and
- directly via ColCap employees through ColCap’s retail channel – Homestar Finance.

### (b) Distribution conditions and restrictions

The Visa Debit Card should only be distributed to individuals who:

- have an eligible loan product from ColCap;
- successfully pass the identification and verification checks put in place by ColCap; and
- who have elected to link the Visa Debit Card to their loan product.

### (c) Adequacy of distribution conditions and restrictions

Given the requirement that the cardholder have an eligible loan product with ColCap and elect to link the Visa Debit Card to the loan product, the distribution conditions and restrictions will make it likely that consumers who purchase the product are in the class of consumers for which it has been designed.

## 4. Reviewing this Target Market Determination

We will review this Target Market Determination in accordance with the below:

|                                  |  |
|----------------------------------|--|
| <b>Initial review</b>            | Within 12 months of the effective date.  |
| <b>Periodic reviews</b>          | At least every 1 year from the initial review.   |
| <b>Review triggers or events</b> | Any event or circumstances arise that would suggest the Target Market Determination is no longer appropriate. This may include (but not limited to): <ul style="list-style-type: none"> <li>• a material change to the design or distribution of the Visa Debit Cards, including related documentation;</li> <li>• occurrence of a significant dealing;</li> </ul> |

# Target Market Determination

- distribution conditions found to be inadequate;
- change in legal or regulatory requirements;
- external events such as adverse media coverage or regulatory attention; and
- significant changes in metrics, including, but not limited to, 10 complaints related to the Visa Debit Card in any 6 month period;
- a significant number of complaints from customers who acquired the product, which relate to the customer's purchase or use of the product and show that the TMD may no longer be appropriate; or
- a significant dealing of the product to consumers outside the target market occurs.

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

## 5. Reporting and monitoring this Target Market Determination

We will collect the following information from our distributors in relation to this Target Market Determination:

|                             |  |
|-----------------------------|--|
| <b>Complaints</b>           | Distributors will report all complaints in relation to the product(s) covered by this Target Market Determination to ColCap who provide complaints information to Indue on a monthly basis. This will include written details of the complaints. |
| <b>Significant dealings</b> | Distributors will report if they become aware of a significant dealing in relation to this Target Market Determination within 10 business days.  |