

# **Target Market Determination**

Product	SME Business Loans – Variable Rate (Interest Only)				
	This Target Market Determination (TMD) document seeks to offer customers with an understanding of the class of customers for which this product has been designed, having regard to their needs and objectives and financial situation.				
	This document is not intended to provide financial advice.				
	Customers must refer to any other document(s) provided, when making a decisabout purchasing this product.				
Issuer	in1bank Ltd				
	ABN 62 627 541 011 ACN 627 541 011	1 AFSL 515926			
Date of TMD	11th March 2022				
Target Market	Description of target market				
	The target market for the SME Loans – Variable Rate (Interest Only) product may include: business customers who require finance to purchase or refinance a commercial property, or who have other business purposes such as funding working capital, purchase of equipment, or expansion and growth of their business with a flexible loan to make additional repayments and redraw funds.				
	Description of product, including key attributes	Needs and objectives of target market			
	The product description and key attributes for the SME Loan Variable Rate product include:	This product is designed for customers with the following objectives, financial situation and financial needs.			
	<ul> <li>ability to use loan for a range of approved business and investment purposes;</li> <li>interest-only repayments</li> <li>variable interest rate;</li> <li>wide range of facility amount available (minimum loan amount is \$150,000, maximum loan amount is \$2,500,000);</li> <li>5 year maximum loan term;</li> </ul>	Likely objectives of the target market  To finance investments (e.g. the purchasing of assets for investment purposes) or other business purposes suited to reduced repayment amounts.			
	penalty interest rates apply     on default;	Financial situation of the target market			
	upfront fees, including     establishment fees or     settlement fees;	Customers who are in the financial situation to meet the in1bank's credit assessment requirements, able to offer collateral to secure the loan and having access to regular and sufficient			

ersion1 page 1

•	ongoing fees, including loan		
	administration fees or		
	discharge fees;		

cashflow to meet the upfront fees, ongoing fees, and interest amounts due.

Likely needs of the target market

- monthly repayment frequency (subject to satisfying the minimum monthly repayment commitment detailed in the Offer and loan contract);
- Customers who are looking to finance
- repayments can be made via direct credits and/or periodical payments; and
- ability to make additional repayments (subject to terms and conditions);

the purchase, expansion or other capital requirements for business investment with flexible repayment options.

This product is not suitable for customers who:

- require a loan predominantly for non-business or non-investment purposes;
- do not meet the credit eligibility requirements,

## Distribution Conditions

#### Condition 1 - Distribution channels

The SME Loans – Variable Rate (Interest Only) product can only be provided to customers through the following channels:

- Online (in1bank's Website);
- in1bank's Business Development Resources; and
- Brokers (by referral to authorised in1bank staff).

This SME Loans – Variable Rate (Interest Only) product cannot be distributed by third parties. While brokers may refer customers to in1bank, only authorised in1bank staff may decide to issue this product to a customer.

This condition is appropriate as it ensures in 1 bank only considers providing the SME Loans – Variable Rate (Interest Only) product if the customer's application through distribution channels subject to appropriate conditions, controls and monitoring by in1bank.

#### Condition 2 - Application process

The SME Loans – Variable Rate (Interest Only) product can only be provided to customers after they have received sufficient information (as assessed by authorised in1bank staff and brokers) about this product from the relevant distribution channel.

This condition is appropriate when read with Conditions 1, 3 and 4. These conditions impose obligations on in1bank (and authorised brokers) to ensure that customers are only issued this product if they meet the eligibility requirements as assessed by authorised trained in1bank staff and brokers who have undergone training.

### Condition 3 - Eligibility requirements

The SME Loans – Variable Rate (Interest Only) product can only be provided to a customer after the authorised in1bank staff or broker in the relevant distribution channels have conducted affordability and suitability checks.

This condition is appropriate to ensure that enquiries are made into each customer's needs, objectives and financial situation demonstrating the customer's ability to repay the loan, as well as whether the product will meet the customer's needs and expectations.

## **Condition 4 - Training**

Staff who distribute in1bank products (and brokers who refer customers to in1bank) must be qualified and meet in1bank's requirements.

This condition is appropriate to ensure that all distribution channels through which the SME Loans – Variable Rate (Interest Only) product could be distributed or provided understand the distribution process with which they are required to comply when distributing in1bank products, as well as their legal obligations when doing so.

## Review Triggers

In addition to conducting periodic reviews of this TMD, in1bank and any distributor of this product must cease all retail product distribution conduct in respect of this product within 10 business days of in1bank identifying a review trigger, unless:

- in1bank has determined that this TMD continues to be appropriate; or
- a new TMD has been made.

Certain events may trigger a review of this TMD if in1bank determines it may relate to the appropriateness of the TMD. The review triggers that would reasonably suggest that the TMD is no longer appropriate include:

- a significant dealing of the product to customers outside the target market as described in this TMD;
- a significant number of complaints (i.e. more than 10 complaints) is received from members in relation to their purchase or use of the product that reasonably suggests that the TMD is no longer appropriate;
- a material change to the product (such as the Features of the Product, Fees & Charges of the product occurs which would cause the TMD to no longer be appropriate.

Review Periods	First review date: 11th March 2023			
	Periodic reviews: each periodic review of this product and TMD must be completed within each consecutive 12 month period from the first review date.			
Distribution Reporting Requirements	Distributors who engage in retail product distribution conduct in relation to this product must provide the following information in writing within the relevant reporting periods:			
	Type of information	Description	Reporting period	
	Complaint Information	Complaints related to the risk, key terms, conditions or key attributes of this product, including:	Every three months	
		the number of complaints;		
		the nature and     circumstances of the     complaints; or		
		whether or not there has been or is likely to be consumer harm or detriment and if so, the nature of the harm or detriment.		
	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	