

Target Market Determination

Version 1 dated October 2021



This Target Market Determination (TMD) has been prepared in accordance with the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019* and associated Regulations. TMDs are designed to assist issuers to ensure that financial products they issue are likely to be consistent with the *likely objectives, financial situation and needs* of the consumers for whom they are intended (the target market) and to assist distributors to ensure that financial products are distributed to the target market.

The TMD is general in nature and should not be construed as financial advice. Consumers should obtain independent advice prior to acquiring the product to ensure that it is appropriate for their particular *objectives, financial situation and needs*.

Product	Advantage Special
Reference documents	General Home Loan Terms and Conditions and Credit Guide
Issuer	This product is issued by Bendigo and Adelaide Bank Limited ABN 11 068 049 178 AFSL and Australian Credit Licence 237879 and managed by Mortgage House ABN 98 081 508 054 Australian credit licence 393283
Date of TMD	5 October 2021
Target Market	<p>Description of target market</p> <p>The features of this product have been assessed as meeting the <i>likely objectives, financial situation and needs</i> of consumers who:</p> <ul style="list-style-type: none"> • meet the eligibility criteria; • require a loan to purchase or refinance an owner occupied or investment residential property; • require the option of a variable or fixed rate; • may want access to other optional features and benefits (such as linked offset account); and • require the option of either principal and interest or interest only (available for investment residential properties and construction loans only) repayments; and • require the option of a relocation loan. <p>Variable Rate</p> <p>Whilst variable interest rates may fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to make additional repayments and/or deposit funds into an offset account to reduce interest payable whilst retaining the ability to draw on those funds when required.</p> <p>Fixed Rate</p> <p>Whilst the product has a limit on additional repayments and does not permit redraw, the product meets the likely objectives, financial situation and needs of consumers in the target market because the fixed rate provides certainty of repayments during the fixed period, making household budgeting easier.</p>

Additionally the product benefits consumers within the target market by having an interest only repayment option which may be preferred in some instances for tax purposes.

Owner Occupied Residential Property

This product allows consumers to finance the purchase or refinance of an owner occupied residential property with the ability to select principal and interest repayments in order to reduce the overall debt and build equity or interest only.

Investment Residential Property

This product allows consumers to finance the purchase, refinance or construction of an investment property with the ability to select:

- principal and interest repayments in order to reduce the overall debt and build equity; or
- interest only for tax purposes.

Relocation loan

This product allows consumers to purchase an owner occupied or investment residential property without the worry of having to sell their current property first. This product will act as a short-term bridging loan for a term of up to 6 months for the purchase of an existing property and up to 12 months when constructing a new property.

Description of product, including key attributes

- Variable interest rate;
- Fixed interest rate over:
 - 1, 2, 3 & 5 year term on principal & interest for Owner Occupied; and
 - 1, 2 & 3 year term on principal & interest and interest only for Investment.
- Offset account is available;
- Redraw is available on a variable interest rate.
- Minimum loan amount \$150,000.
- Maximum loan amount \$5,000,000.
- Maximum loan term 30 years.
- Maximum Loan to Valuation Ratio (LVR):
 - 90% + LMI on principal and interest for Owner Occupied.
 - 90% including LMI for Construction
 - 90% including LMI on principal and interest for Investment.
 - 80% on interest only for Investment.
- Lenders Mortgage Insurance applies if LVR is above 80%.
- Repayment options:
 - principal and interest for Owner Occupied.
 - principal and interest and interest only for Investment.
 - Interest only for Construction
- Repayment frequency – weekly, fortnightly or monthly.
- Establishment fee is payable.
- Settlement fee is payable.
- Loan Processing fee is payable.
- Building loan fee is payable on loan for Construction.
- Monthly fee applies to the offset account.
- Guarantor fee is payable (if applicable).

	<ul style="list-style-type: none"> • Nil redraw fee for redraw conducted via internet banking (a fee applies for staff assisted redraw). <p>Classes of consumers for who the product may not be suitable</p> <p>This product may not be suitable for consumers who:</p> <ul style="list-style-type: none"> • do not meet the eligibility requirements; • are looking to consolidate more than 4 debts; 						
<p>Distribution Conditions</p>	<p>Distribution conditions</p> <p>The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:</p> <table border="1" data-bbox="432 645 1385 1077"> <thead> <tr> <th data-bbox="432 645 762 678">Channel</th> <th data-bbox="762 645 1385 678">Conditions</th> </tr> </thead> <tbody> <tr> <td data-bbox="432 678 762 864">Direct – by phone</td> <td data-bbox="762 678 1385 864">Only authorised staff are permitted to assist consumers with this product. Authorised staff have the necessary training, skills and knowledge to assess whether the consumer is within the target market.</td> </tr> <tr> <td data-bbox="432 864 762 1077">Third party – Accredited mortgage brokers subject to Best Interests Duty (BID) and related obligations</td> <td data-bbox="762 864 1385 1077">All applications submitted by accredited mortgage brokers must comply with our policies and procedures issued to accredited brokers from time to time. 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.</td> </tr> </tbody> </table> <p>The distribution channels and conditions are appropriate because:</p> <ul style="list-style-type: none"> • the product has a wide target market; • our distributors have been adequately trained to understand their DDO obligations; • we rely on existing distributors, methods, controls and supervision already in place; • our approval system has 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; 	Channel	Conditions	Direct – by phone	Only authorised staff are permitted to assist consumers with this product. Authorised staff have the necessary training, skills and knowledge to assess whether the consumer is within the target market.	Third party – Accredited mortgage brokers subject to Best Interests Duty (BID) and related obligations	All applications submitted by accredited mortgage brokers must comply with our policies and procedures issued to accredited brokers from time to time. 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.
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<p>Review Triggers</p>	<p>The following review triggers would reasonably suggest that the TMD may no longer be appropriate:</p> <ul style="list-style-type: none"> • A significant dealing of the product to consumers outside the target market occurs; • A significant number of complaints are received from customers in relation to the product; • A significant number of defaults occur; <p>There is a material change to the product or the terms and conditions of the product.</p>						
<p>Review Periods</p>	<p>First review date: 1 October 2021</p> <p>Periodic reviews: at least every 12 months from the initial review and each subsequent review.</p>						

Distribution Information Reporting Requirements	The following information must be provided to the Issuer by distributors who engage 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 and general feedback relating to the product and its performance	Every 1 month
	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