

TARGET MARKET DETERMINATION

Product Name:	Specialist Alt Doc (“Product”)
Product Type:	Home Loan
Issuer:	Perpetual Trustee Company Limited ACN 000 001 007 (“Perpetual”)
Manager:	Resimac Limited ACN 002 997 935 Australian Credit Licence 247283 of Level 9, 45 Clarence Street, Sydney NSW 2000 (“Resimac”, “we” and “us”)
Reference Documents:	Terms & Conditions, Third Party Access Fee Schedule, Key Facts Sheet and Credit Guide
Made By:	Resimac on behalf of Perpetual
Version:	1.0
Date Made:	1 September 2021
Last Reviewed:	N/A
Ceased Date:	In use

1. TARGET MARKET

Inside the Target Market

The features of this Product have been assessed as meeting the likely objectives, financial situation and needs of consumers who require a secured loan of between \$50,000 and \$2,500,000, repayable over a term of 15 to 30 years to finance the acquisition of residential property for the purpose of it being their principal place of residence or for investment purposes (or refinance other finance that has been provided for such a purpose) with the ability to obtain an equity release or consolidate debt with:

1. The ability to borrow up to 90% of the value of the property;
2. The flexibility of a variable rate;
3. The option of principal and interest or interest only repayments;
4. The option of an offset account;
5. Access to redraw; and
6. The option of a loan access card.

Whilst there may be fluctuations to variable interest rates, we have assessed this Product as being consistent with the likely objectives, financial situation and needs of consumers in the target market because it allows them deposit funds into an offset account and/or make unlimited additional repayments to reduce interest payable. These funds remain accessible to the consumer.

Outside Target Market

Consumers outside the target market are consumers that:

1. Require a loan to finance the acquisition of property for construction purposes;
2. Are PAYG or self-employed and can provide full financials; and
3. Do not have material adverse credit or do not fall outside the standard lending guidelines; and
4. Are seeking to borrow through a self-managed superannuation fund.

Description of Product Including Key Attributes

1. Variable interest rate.
2. Offset account is available.
3. Redraw is available on a variable interest rate.
4. Minimum loan amount \$50,000.
5. Maximum loan amount \$2,500,000.

6. Maximum loan term 30 years.
7. Maximum Loan to Valuation Ratio (LVR) is 90%.
8. Repayment options:
 - a) principal and interest for Owner Occupied;
 - b) interest only for owner occupied to a maximum 80% LVR; and
 - c) principal and interest and interest only for Investment.
9. Repayment frequency for principal and interest repayments – weekly, fortnightly or monthly.
10. Repayment frequency for interest only – monthly.
11. Valuation fee is payable.
12. Settlement fee is payable.
13. Risk fee may be payable.

Note that exceptions may be made to the above on a case by case basis.

2. DISTRIBUTION CHANNELS & CONDITIONS

The Product can only be distributed by accredited intermediaries.

The Product can also only be distributed by:

1. Accredited mortgage brokers subject to a best interests duty and related obligations, directly to consumers (“Broker Direct Channel”);
2. Mortgage brokers subject to a best interests duty and related obligations, through accredited aggregators, to consumers (“Broker Channel”); and
3. Accredited
 - a) mortgage originators directly to consumers; or
 - b) mortgage brokers subject to a best interests duty and related obligations, through accredited mortgage originators, directly to consumers (“MO Channel”).

The distribution channels and conditions are appropriate because:

1. The Product has a wide target market;
2. Accredited mortgage brokers via the Broker Direct Channel and Broker Channel are subject to a higher duty under a best interests duty to ensure that the Product is in the best interests of the particular consumer;
3. We rely on existing distributors, methods, controls and supervision already in place; and
4. Our application and approval process has controls in place to flag consumers who may be outside the target market.

3. REVIEW TRIGGERS

The following review triggers would reasonably suggest that the target market determination may no longer be appropriate:

1. A significant dealing of the Product to consumers outside the target market occurs;
2. Material changes are made to the Product terms and conditions, other than changes to variable interest rates and consequential changes to repayments;
3. A 30% increase in monthly complaint volume for the Product as compared to the average monthly complaint volume for the Product for the prior 6 months; and

4. A 30% increase in the refinance rate within 6 months of settlement for the Product as compared to the average monthly refinance rate within 6 months of settlement for the Product for the prior 6 months.

4. REVIEW PERIOD

An initial review of this target market determination will occur within 12 months of the date of this target market determination. This target market determination is then to be reviewed at least every 12 months.

5. INFORMATION REPORTING

Table 5.1 below sets out the information which we require to be reported to us in respect of the Product by persons who engage in retail distribution conduct in respect of the Product. Unless otherwise stated, the first reporting period commences on the date this target market determination is made and each subsequent reporting period commences at the end of the prior reporting period.

Table 5.1

Information required to be reported	Who is required to report?	How frequently is a report required (reporting period)?	How will the report be made?
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 target market determination))	Head of Product & Commercial Operations for significant dealings identified by us in relation to the Product	As soon as practicable, and in any case within 10 business days after becoming aware	By email to the Head of Compliance & Enterprise Risk (compliance@resimac.com.au)
	Brokers for significant dealings identified by them in relation to the Product		
	Aggregators for significant dealings identified by them in relation to the Product		
	Mortgage originators for significant dealings identified by them in relation to the Product		
Material changes to the Product terms and conditions	Head of Product & Commercial Operations	As soon as practicable	By email to the Head of Compliance & Enterprise Risk (compliance@resimac.com.au)

Each individual consumer complaint (details of the complaint, including name and contact details of complainant and substance of the complaint) for active loans of this type	Compliance & Enterprise Risk Analyst for complaints received by us in relation to the Product	As soon as practicable and within 10 business days of receipt of complaint	For the Compliance & Enterprise Risk Analyst, by email to the Head of Compliance & Enterprise Risk (compliance@resimac.com.au) For brokers, aggregators and mortgage originators, by completing and submitting a complaint information form (www.resimac.com.au/design-distribution-obligation-complaints)
	Brokers for complaints by them in relation to the Product		
	Aggregators for complaints received by them in relation to the Product		
	Mortgage originators for complaints received by them in relation to the Product		
Consumer complaints information (number of complaints and general feedback relating to the Product and its performance) for active loans of this type	Compliance & Enterprise Risk Analyst for complaints received by us in relation to the Product	Quarterly	For the Compliance & Enterprise Risk Analyst, by email to the Head of Product & Commercial Operations (Product@resimac.com.au) For brokers, aggregators and mortgage originators, by responding to our quarterly email survey within 10 business days after receipt
	Brokers for complaints by them in relation to the Product		
	Aggregators for complaints received by them in relation to the Product		
	Mortgage originators for complaints received by them in relation to the Product		
Refinance rate within 6 months of settlement	Head of Product & Commercial Operations	Monthly	By email to the Head of Compliance & Enterprise Risk (compliance@resimac.com.au)

6. REVISION MANAGEMENT

Date	1 September 2021
Current Version	1.0
Approved By	Jointly by: General Manager - Governance, Change and Culture; General Manager - Credit Risk & Asset Management; and General Manager - Distribution.
Comments	Target market determination made