

Target Market Determinations – Flexi Elevate

Legal Disclaimer:

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). It sets out the class of customers for whom the product, including its key attributes, would likely be appropriate and consistent with their likely objectives, financial situation and needs. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of Brighten Home Loans Pty Ltd ACN 620 839 983 (**Brighten**) design and distribution arrangements for the product.

This document is not a Product Disclosure Statement (**PDS**) and is not a summary of the product features or terms of the product. The information contained in this TMD does not take into account any person's individual objectives, financial situation or needs.

Product	Flexi Elevate
Issuer	Brighten Home Loans Pty Ltd ACN 620 839 983
Date of TMD	Created on 16 August 2022 Last Reviewed on 7 September 2026 Version 20260904
Target Market	Description of target market The above product is a full documentation (Full Doc) loan secured over established residential property by first mortgage. The product is acceptable for the following applicants: • Australian citizens or permanent residents with income in an acceptable foreign currency; or • Australian temporary residents (with an acceptable Australian Visa) with income in AUD or an acceptable foreign currency. Visa remaining term needs to be at least 12 months; and • Minimum age of borrower is 18. class of consumers for whom this product, including its key attributes, is likely to be consistent with their likely objectives, financial situation and needs: The product is a Full Doc variable-rate loan secured by first registered mortgage over established residential property in an acceptable location (Category 1 and Category 2 postcodes), for purchase, refinance or equity release of owner-occupied or investment property, designed for consumers whose income is wholly or partly in an acceptable foreign currency. It is designed for consumers aged 18 or over who are: • Australian citizens or permanent residents with income in an acceptable foreign currency; or • Australian temporary residents holding an acceptable visa (refer Flexi Elevate Acceptable Visa List), with income in AUD or an acceptable foreign currency; • seeking to purchase, refinance or release equity in owner-occupied or investment residential property; • seeking a loan of \$50,000 to \$15,000,000 at an LVR of up to 80%; and • seeking a loan term of up to 30 years with principal-and-interest or interest-only (up to 5 years) repayments, and want features such as a

100% offset facility, redraw and up to 5 splits.

Foreign-currency income is assessed with a servicing buffer/shading in line with Flexi's credit policy. Non-resident applicants must provide evidence of FIRB approval or an exemption.

All customers must satisfy Flexi's credit serviceability requirements, and the security offered must meet Flexi's acceptable security and location (postcode category) criteria.

Description of product, including key attributes

Information about the product's specifications is set out below:

- Purpose of the loans is purchase, refinance or equity release of owner occupied or investment property.
- Loan term of up to 30 years;
- Maximum LVR of 80%;
- Repayment of either principal and interest or interest only (max 5 years);
- 100% offset facility included;
- Products facilitate up to 5 loan splits;
- Online access through the Flexi Home Loans portal; and

Repayment methods include Direct Debit, BPAY and Pay anyone. ***Description of likely objectives, financial situation and needs of customers in the target market***

This product is designed for customers who are:

- Seeking to purchase residential property within Australia for either owner occupation or investment purposes;
- Seeking to refinance residential property within Australia for either owner occupation or investment purposes;
- Seeking to consolidate debt (i.e. credit cards, personal loans, business loans, etc.);
- Seeking to make non-structural home improvements;
- Seeking to make an "Off the Plan" purchase;
- Seeking to release equity for acceptable purposes
- Seeking flexibility to make extra repayments without a fee;
- Seeking flexibility to redraw funds as required; and
- Seeking additional features on their home loan (i.e. offset account).

All customers must satisfy Flexi's credit assessment and AML/CTF requirements.

Classes of customers for whom the product is clearly unsuitable

We will not accept applications from Politically Exposed Persons without approval from compliance, or from applicants located in countries identified by FATF as having AML/CTF deficiencies.

Applicants will not be considered from the following:

- Minors;
- Companies or company trustees involving disqualified directors;
- Companies and/or individuals where a significant portion of their income is derived from the purchase / development / re-sale of property, unless to purchase or refinance their owner-occupied residence (cash out limited to \$10,000);
- Bankrupts discharged < 2 years ago;
- Applicants under external administration;
- Superannuation funds (either applicant or security provider);
- Public companies;
- Owner Builders;
- Limited Liability Companies;
- Associations;
- Churches;

	• Clubs; and • Borrowers of Convenience. <i>Explanation of why the product is likely to be consistent with the likely objectives, financial situation and needs of customers in the target market</i> This product is likely to be consistent with the likely objectives, financial situations and needs of the customers within the target market as it is a straightforward loan construct to understand: • Variable interest rates only; and • Repayments of principal and interest or interest only up to 5 years. To be eligible to qualify for this product, requirements must be met in relation to: • Employment; • Income, and • Credit criteria being met following loan assessment. which would mean that, without exceptional circumstances, the Borrowers will be able to meet their repayment obligations. Customers will need to also provide sufficient security in accordance with Flexi's credit assessment criteria, including: • Acceptable property mortgage; • General or specific security agreements; and/or • Guarantor who supports the loan by providing additional security. The financial situation of the Target Market are customers that meet Flexi's credit assessment criteria which includes: • Demonstrating the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and • Where determined by Flexi to be required, (based on the customer's security, applicant and loan attributes), have an acceptable guarantor. Flexi considers its processes in place, including assessing the customer's ability to service the loan account, will mean that the product will likely be consistent with the financial situation of the Target Market.
Distribution Conditions	<i>Distribution conditions</i> The Distribution Partners are appropriately licensed as an Australian Credit Licensee, employee of an Australian Credit Licensee, or Credit Representative, and under this licence are required to maintain appropriate professional development training, to distribute the product to customers who are in the target market. The distribution channels and conditions are appropriate because: • Distribution Partners must comply with licensing and legislative requirements to ensure the product provided is in the best interests of each customer. • Flexi monitors application quality received from Distribution Partners, tracking trends that indicate poor practices, incomplete applications, or inadequate assessments. • Internal Distribution Partners have KPIs, monitoring and performance metrics in place and there is oversight regarding poor performing loans, fraud, AML/CTF breaches, and other unacceptable practices. • All external Distribution Partners have an agreement which includes commission or fee clawback clauses for poor performing loans, fraud, AML/CTF breaches, and other unacceptable practices.

	- We will not accept applications from customers who fall materially outside of the target market for this product. - Flexi also reserves the right in these agreements to terminate Brokers for any reason In order to distribute this product to a potential customer within the target market, the customer must not: - Fall into a class of customers set out under the above heading, "<i>Classes of customers for whom the product is clearly unsuitable</i>"; or - Provide an unacceptable security type. Further eligibility requirements to qualify for this product include: - Employment requirements of the target market; and - Income requirements of the target market.									
Review Triggers	The review triggers that would reasonably suggest that the TMD is no longer appropriate include the following events and circumstances: - A material change to the product or the terms and conditions of the product. - A significant dealing of the product, as decided by us, to customers outside the target market occurs. - Changes to the regulatory environment or relevant legislation which materially impacts upon the design and distribution of the product. - A material increase in customer complaints about the product or Distribution Partner conduct. - A material increase to default or hardship rates for the product. - A material or unexpected decline in applications from the target market. - A material or unexpected increase of customers seeking to switch to other products. - A notification from a regulator in relation to the distribution of the product. - Any other event or circumstance which reasonably suggests that the TMD is no longer appropriate.									
Review Periods	Periodic reviews: Every 24 months or within 10 business days of a Review Trigger being identified.									
Distribution Information Reporting Requirements	Distribution Partners must provide the following information to Flexi: <table><tr><td></td><td></td><td></td></tr><tr><td></td><td>If received, number of complaints received in relation to the product, the nature of the complaint, circumstances giving rise to the complaint and the complaint outcome.</td><td>Every 6 months</td></tr><tr><td></td><td>If received, the extent and the nature of the complaints received about a Distribution Partner or from a Distribution Partner, whether external or internal, in relation to the product, the nature of the complaint, circumstances giving rise to the complaint and the complaint outcome and/or about difficulty in selling to the targets market</td><td>Every 6 months</td></tr></table>					If received, number of complaints received in relation to the product, the nature of the complaint, circumstances giving rise to the complaint and the complaint outcome.	Every 6 months		If received, the extent and the nature of the complaints received about a Distribution Partner or from a Distribution Partner, whether external or internal, in relation to the product, the nature of the complaint, circumstances giving rise to the complaint and the complaint outcome and/or about difficulty in selling to the targets market	Every 6 months
	If received, number of complaints received in relation to the product, the nature of the complaint, circumstances giving rise to the complaint and the complaint outcome.	Every 6 months								
	If received, the extent and the nature of the complaints received about a Distribution Partner or from a Distribution Partner, whether external or internal, in relation to the product, the nature of the complaint, circumstances giving rise to the complaint and the complaint outcome and/or about difficulty in selling to the targets market	Every 6 months								

	Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (i.e. why it is not consistent with the TMD)	As soon as practicable, and in any event within 10 business days after becoming aware.
	Dealings outside of the target market	Date or date range of the dealing(s) outside of the target market (to the extent they are aware of such dealings) and the reason why distribution occurred.	Every 6 months