

Target Market Determination

Product	<p>SME Business Loans Variable Rate</p> <p>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.</p> <p>This document is not intended to provide financial advice.</p> <p>Customers must refer to any other document(s) provided, when making a decision about purchasing this product.</p>								
Issuer	<p>in1bank Ltd</p> <p>ABN 62 627 541 011 ACN 627 541 011 AFSL 515926</p>								
Date of TMD	<p>11^h March 2022</p>								
Target Market	<p>Description of target market</p> <p>The target market for the SME Loans - Variable Rate 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.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>Description of product, including key attributes</p> <p>The product description and key attributes for the SME Loan Variable Rate product include:</p> <ul style="list-style-type: none"> • ability to use loan for a range of approved business and investment purposes; • variable interest rate; • interest and principal repayments; • wide range of facility amount available (minimum loan amount is \$150,000, maximum loan amount is \$2,500,000); • flexible loan term length (up to maximum loan term of 30 years); </td> <td style="width: 50%; vertical-align: top;"> <p>Needs and objectives of target market</p> <p>This product is designed for customers with the following objectives, financial situation and financial needs.</p> </td> </tr> <tr> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • penalty interest rates apply on default; </td> <td style="vertical-align: top;"> <p>Likely objectives of the target market</p> <p>To support business investment and cashflow requirements by minimising the regular repayment.</p> </td> </tr> <tr> <td></td> <td></td> <td style="vertical-align: top;"> <p>Financial situation of the target market</p> <p>Customers who are in the financial situation to meet the in1bank's credit</p> </td> </tr> </table>		<p>Description of product, including key attributes</p> <p>The product description and key attributes for the SME Loan Variable Rate product include:</p> <ul style="list-style-type: none"> • ability to use loan for a range of approved business and investment purposes; • variable interest rate; • interest and principal repayments; • wide range of facility amount available (minimum loan amount is \$150,000, maximum loan amount is \$2,500,000); • flexible loan term length (up to maximum loan term of 30 years); 	<p>Needs and objectives of target market</p> <p>This product is designed for customers with the following objectives, financial situation and financial needs.</p>	<ul style="list-style-type: none"> • penalty interest rates apply on default; 	<p>Likely objectives of the target market</p> <p>To support business investment and cashflow requirements by minimising the regular repayment.</p>			<p>Financial situation of the target market</p> <p>Customers who are in the financial situation to meet the in1bank's credit</p>
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	<ul style="list-style-type: none"> • upfront fees, including establishment fees or settlement fees; • ongoing fees, including loan administration fees or discharge fees; 	<p>assessment requirements, able to offer collateral to secure the loan and having access to regular and sufficient cashflow to meet the upfront fees, ongoing fees, principal and interest amounts due.</p>
	<ul style="list-style-type: none"> • monthly repayment frequency (subject to satisfying the minimum monthly repayment commitment detailed in the Offer and loan contract); • repayments can be made via direct credits and/or periodical payments; and • ability to make additional repayments (subject to terms and conditions); 	<p>Likely needs of the target market</p> <p>Consumers wanting access to flexible repayment options including the ability to make extra repayments, and to redraw funds up to the available limit</p>
	<p>This product is not suitable for customers who:</p> <ul style="list-style-type: none"> • require a loan predominantly for non-business or non-investment purposes; or • do not meet the credit eligibility requirements. 	
<p>Distribution Conditions</p>	<p>Condition 1 - Distribution channels</p> <p>The SME Loans - Variable Rate product can only be provided to customers through the following channels:</p> <ul style="list-style-type: none"> • Online (in1bank’s Website); • in1bank’s Business Development Resources; and • Brokers (by referral to authorised in1bank staff). <p>This SME Loans - Variable Rate 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.</p> <p>This condition is appropriate as it ensures in1bank only considers providing the SME Loans - Variable Rate product if the customer’s application through distribution channels subject to appropriate conditions, controls and monitoring by in1bank.</p> <p>Condition 2 - Application process</p> <p>The SME Loans - Variable Rate 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.</p> <p>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.</p>	

	<p>Condition 3 - Eligibility requirements</p> <p>The SME Loans - Variable Rate 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.</p> <p>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.</p> <p>Condition 4 - Training</p> <p>Staff who distribute in1bank products (and brokers who refer customers to in1bank) must be qualified and meet in1bank's requirements.</p> <p>This condition is appropriate to ensure that all distribution channels through which the SME Loans - Variable Rate 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.</p>						
<p>Review Triggers</p>	<p>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:</p> <ul style="list-style-type: none"> • in1bank has determined that this TMD continues to be appropriate; or • a new TMD has been made. <p>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:</p> <ul style="list-style-type: none"> • 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 (such as to the Features of the Product, or the Fees & Charges of the product) occurs which would cause the TMD to no longer be appropriate. 						
<p>Review Periods</p>	<p>First review date: 11th March 2023</p> <p>Periodic reviews: each periodic review of this product and TMD must be completed within each consecutive 12 month period from the first review date.</p>						
<p>Distribution Reporting Requirements</p>	<p>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:</p> <table border="1" data-bbox="443 1787 1426 1877"> <thead> <tr> <th data-bbox="443 1787 659 1877">Type of information</th> <th data-bbox="659 1787 1118 1877">Description</th> <th data-bbox="1118 1787 1426 1877">Reporting period</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Type of information	Description	Reporting period			
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	Complaint Information	<p>Complaints related to the risk, key terms, conditions or key attributes of this product, including:</p> <ul style="list-style-type: none"> • 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. 	Every three months
	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