



# **POLAR FINANCE**

## **Target Market Determination**

**Issue Date: 5 October 2021**

### **1. About this document**

This target market determination (TMD) seeks to offer consumers, distributors and staff with an understanding of the class of consumers for which this product has been designed, having regard to the objectives, financial situation and needs of the target market.

This document is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. Consumer must refer to the terms and conditions and any supplementary documents which outline the relevant terms and conditions under the product when making a decision about this product.

Terms and Conditions to which this target market determination applies

- This TMD applies to the Residential Full Doc Home Loan referred to in the following Terms and Conditions: Home Loan General Terms and Conditions (RMBS)

Date from which this target market determination is effective

5 October 2021

### **2. Class of consumers that fall within this target market**

The information below summarises the overall class of consumers that fall within the target market for Residential Full Doc Home Loan, based on the product key attributes and the objectives, financial situation and needs that it has been designed to meet.

This Residential Full Doc Home Loan has been designed for consumers whose likely objectives, financial situation and needs (as listed below) are aligned with the product (including the key attributes). The Residential Full Doc Home Loan is for those who are seeking an amount of credit for the purposes of:

- purchasing a property that will be for private use
- purchasing a property that will be for investment use
- paying out an existing loan against a property they already own



## **POLAR FINANCE**

- conducting non-structural renovations to a property they already own
- purchasing personal commodities such as cars, boats, furniture, caravans, motorbikes, etc...
- purchasing a business using a residential property they already own as security
- releasing equity to be used for future investment purposes
- consolidating existing debts such as personal loans and credit cards

### Product description and key attributes

- The key eligibility requirements and product attributes of this Residential Full Doc Home Loan are:
- Individuals must be minimum age of 18 years
- Borrowing entity can be individual, company or trust
- Minimum Loan amount of \$100,000
- Maximum Loan amount of \$2,000,000
- Maximum LVRs:
- 80.01% to 85% for loans up to \$1,000,000
- 70.01% to 80% for loans up to \$1,500,000
- Up to 70% for loans up to \$2,000,000
- Up to 30-year loan term
- Repayments can be either P&I or IO of up to 5 years then reverting to P&I repayments (further 5 year IO periods may be available if applied for)
- Variable rate, 5 year Fixed rate Options or a combination of both variable and fixed available
- Weekly, Fortnightly or Monthly Repayment Frequency (IO is only monthly)
- Unlimited Additional Repayments for Variable rate Loans
- Increases to existing loans if within maximum LVR and loan amount criteria
- Security Substitutions
- Unlimited redraw

Note that exceptions to the above may be made on a case by case basis where still consistent with the consumers objectives, financial situation, and needs.

### **Objectives, financial situation, and needs**

#### **This product has been designed for individuals who are:**

- Looking to obtain credit against residential property
- able to meet minimum servicing requirements



## **POLAR FINANCE**

- PAYG
- Self employed
- able to meet minimum deposit requirements for purchases
- not in arrears if refinancing

### **Excluded class of consumers**

**This product has not been designed for individuals who are:**

- under 18 years of age
- Australian citizens living overseas
- Non-permanent residents residing in Australia
- Limited liability company
- Associations, churches and clubs
- have unpaid defaults noted on their credit report
- have unsettled judgements noted on their credit report without reasonable explanation
- Currently declared bankrupt

### **Consistency between target market and the product**

- This is based on an analysis of the key terms, features and attributes of the product and a finding that these are consistent with the identified class of consumers

## **3. How this product is to be distributed**

Distribution channels

This product is designed to be distributed through the following means:

- Accredited Brokers who hold an ACL
- Authorised Credit representatives

### **Distribution conditions**

**This product should only be distributed under the following circumstances:**

- to individuals that meet eligibility requirements; individuals that have the appropriate borrowing capacity, and in accordance with lending guidelines; by third party distributors authorised by us to distribute the products



## POLAR FINANCE

### Adequacy of distribution conditions and restriction

- This is based on an assessment of the distribution conditions and restrictions and that they are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

#### 4. Reviewing this target market determination

We will review this target market determination in accordance with the below:

Initial review	Within 12 months of the effective date.
Periodic reviews	At least every 12 months from the last review.
Review triggers or events	<p>Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited):</p> <ul style="list-style-type: none"><li>• a material change to the design or distribution of the product, including related documentation;</li><li>• occurrence of a significant dealing;</li><li>• distribution conditions found to be inadequate;</li><li>• external events such as adverse media coverage or regulatory attention; and</li><li>• significant changes in metrics, including, but not limited to, complaints</li></ul>

Where a review trigger has occurred, this TMD will be reviewed within 10 business days.

#### 5. Reporting and monitoring this target market determination

We may collect the following information from our distributors in relation to this TMD.

##### Complaints

Distributors will report all complaints in relation to the products covered by this TMD on a quarterly basis. The report will include:

- number of complaints; and
- general feedback relating to the Products and their performance for active loans of these types



## **POLAR FINANCE**

The report will be made by email to the Head of Compliance ([compliance@Polarfin.com.au](mailto:compliance@Polarfin.com.au)).

### **Significant dealings**

Distributors will report if they become aware of a significant dealing in relation to this TMD within 10 business days. The report will include:

- date or date range of the significant dealing; and
- description of the significant dealing (i.e., why it is not consistent with the target market determination)

The report will be made by email to the Head of Compliance ([compliance@Polarfin.com.au](mailto:compliance@Polarfin.com.au))