# Target Market Determination – Residential Property Loan (NCCP Regulated)

| # | Criteria | Residential Property Loan (NCCP Regulated) | |
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| A | **Entity responsible for preparing this TMD** | BNY Trust Company of Australia Limited – ABN 49 050 294 052 ("**Issuer**") | |
| B | **TMD effective date** | 09/11/2026 | |
| C | **Product name** | Residential Property Loan (NCCP Regulated) | |
| D | **Customer knowledge** | Low complexity | |
| E | **Version Number** | V2.0 | |
| F | **Review Date** | 09/11/2026 | |
| 1 | | **Key Features**<br>• Loan of more than 15 years and up to 30 years in duration.<br>• Loan secured against one or more residential properties.<br>• Can be used for purchase, refinance or equity take out of residential property.<br>• Minimum loan amount is $100,000. Maximum loan amount is $5,000,000 for a loan secured by a single property, and up to $10,000,000 group exposure for loans secured by two or more properties. The maximum amount of the loan is further limited by the location and serviceability assessment.<br>• Minimum property value is $200,000.<br>• The amount of the loan will also depend on the | **Description of the retail class that comprises the target market**<br>Individual customers seeking a 15 – 30 year loan for the finance of a residential owner-occupied or investment property or vacant land amortising over time where the customer can provide security over one or more residential properties and can afford to repay the loan (suitability assessment).<br>For a Residential Property Loan for **investment** purposes, customers who are prepared to pay a higher rate of interest for the loan (than an owner-occupier loan) to purchase/ refinance an investment property.<br>This product is not suitable for customers who cannot provide residential property as security, are unable to meet serviceability requirements, require a loan term outside 15 to 30 years, or are seeking non-amortising loan structures beyond the permitted interest-only period. |

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| | | loan-to-value ratio. | |
| | | ***Variant/ Optional features***<br><br>• Loans may be variable or fixed rate for up to 5 years.<br><br>Loans may be split between fixed and variable interest, up to four ways – minimum is $50,000 per split (however, lower amounts may be available at sole discretion of Think Tank). | Customers who want the flexibility to set their repayment arrangements |
| | | **Variable Loans**<br><br>• Repayment frequency is monthly. Lump sum payments ahead of schedule are permissible.<br><br>Access to Redraw or an Offset Facility is available. | For a Residential Property Loan with a **variable interest rate** customers who:<br><br>• are comfortable with the risk that their interest rate and repayments may go up or down over the life of the loan as with market interest rate fluctuations and who may want flexibility to repay early without fees.<br><br>• customers who may need to prepay the loan.<br><br>For a Residential Property Loan with **Redraw** customers who:<br><br>• wish to access surplus funds made over and above the minimum required repayments.<br><br>For a Residential Property Loan with an **Offset Facility** customers who:<br><br>• wish to hold funds in a separate facility that reduces the amount of interest payable on their loan. |
| | | **Fixed Rate Loans**<br><br>• Repayment frequency is monthly. Lump sum payments ahead of schedule are permissible, | For a Residential Property Loan with a **fixed interest rate** customers who:<br><br>• are comfortable locking in a fixed rate of interest or want |

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| | | subject to payment of a fee in some cases for prepayment on fixed rate loans.<br><br>Redraw and offset facility are not permitted on fixed rate loans | to achieve certainty around repayments for a set period of time (up to five years).<br><br>• do not require flexibility in early repayments or paying out the loan during the fixed interest period (without incurring an additional fee). |
| | | **Interest Only / Principal + Interest**<br><br>An interest only period of up to 5 years may be requested, with the loan then converting to principal + interest. | For a Residential Property Loan with **interest only repayments**<br><br>customers who:<br><br>• want to repay interest only for a fixed period (up to 5 years) and are prepared to pay a higher rate of interest for this feature.<br><br>• want to minimise their repayments over the interest-only period and who can make the higher payments after the interest only period to repay by maturity.<br><br>For a Residential Property Loan with **principal and interest repayments** customers who want to repay both the principal and interest over the period of the loan. |
| 2 | **Description of distribution conditions and restrictions** | **Distribution Conditions**<br><br>Loans are not distributed by the Issuer directly, and are only distributed via Think Tank Group Pty Ltd ("**Think Tank**") as representative through the following third parties:<br><br>• Brokers<br><br>• Aggregators representing individual brokers<br><br>• Aggregators who have entered into a White Label agreement with Think Tank allowing the Aggregator to distribute the Issuer's products.<br><br>(together, the "**Distributors**").<br><br>These distribution conditions are appropriate because they are documented agreements with the relevant parties ("**Distributor Agreements**") which include provisions that:<br><br>• Think Tank may accept or reject an Application at its absolute discretion | |

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| | | • The Introducer agrees to comply with the Introducer Service Procedures and to use reasonable endeavours to ensure that members comply with the Introducer Service Procedures. The Introducer Service Procedures are procedures that Think Tank requires the Introducer and its members to follow as agreed in writing between the partis from time to time<br>• The Introducer must advise Members of any reasonable training requirements specified by Think Tank from time to time<br>• Think Tank reserves the right to accredit each Member in accordance with its specified accreditation process. Think Tank may refuse to accept Applications from any members that have not been accredited in accordance with its required accreditation process. |
| 3 | **Review triggers (events and circumstances that reasonably suggest that the determination is no longer appropriate)** | This determination will be reviewed whenever there are indications of a need for change to any aspect of the product or product delivery. This includes:<br>• Internal decisions to amend or modify the product, its features and/or its distribution<br>• Any regulatory changes, including court decisions, AFCA determinations and regulatory guidance<br>• Changes to economic conditions<br>• An unexpected volume of loans in arrears<br>• Significant change in customer complaints and/or feedback relating to the product.<br>• An unexpected, significant increase in early termination of the product.<br>• For fixed interest rate loans specifically:<br>– a significant increase in customers being charged early repayment and/or pay out costs<br>– a change in the interest rate environment such that there is no reasonable likelihood of benefit or value to the customer of obtaining a fixed interest rate<br>• Any other event that occurs or information received that reasonably suggests the determination is no longer appropriate |
| 4 | **Maximum period from the start of the day the determination is made to the start of the day the** | 6 months |

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<tr><td></td><td>first review of the determination is to finish</td><td></td></tr>
<tr><td>5</td><td>Maximum period from the date the previous review finished to the start of the day the next review of the determination is to be undertaken</td><td>6 months</td></tr>
<tr><td>6</td><td>Reporting period for reporting information about the number of complaints about the product received</td><td>Distributors are required to provide information about complaints received in relation to the Residential Property Loan (NCCP) within 10 Business Days after the end of each calendar quarter.</td></tr>
<tr><td>7</td><td>Information needed to enable prompt identification of whether a review trigger, or another event or circumstance that would reasonably suggest that the determination is no longer appropriate, has occurred.<br><br>For each type of information, specify:<br><br>- the regulated persons are required to report the Issuer; and<br><br>a reporting period for reporting the information under section 994F(5) of the Corporations Act.</td><td>The Issuer will collect the following information from each Distributor:<br><br>
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<tr><th>Complaints & Feedback</th><th>Reporting Period</th></tr>
<tr><td>For each complaint received:<br>• The time and date the complaint was received<br>• the substance of the complaint<br>• which products the complaint relates to<br>Any other general feedback in relation to the product or its distribution</td><td>Within 10 Business Days of the end of each calendar quarter.</td></tr>
<tr><td>Communications from regulators</td><td></td></tr>
<tr><td>Any feedback from any regulator or other industry or consumer body which relates to the product or its distribution</td><td>As soon as practicable and in all cases within 10 business days of receipt.</td></tr>
<tr><td>Significant dealings</td><td></td></tr>
<tr><td>Details of any significant dealings outside the target market including information on:<br><br>• the volume of the dealing<br><br>• why it is not consistent with the TMD<br><br>• how it was identified<br><br>any steps taken in relation to the significant dealing outside the target market.</td><td>As soon as practicable, and in all cases within 10 business days of becoming aware of the significant dealing.</td></tr>
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This target market determination is not a summary of the terms and conditions of the Residential Property Loan (NCCP), and it does not contain all of the conditions or regulations that the Issuer, Think Tank or any Distributor must adhere to in providing the product to any person. This target market determination does not set out the risks of the product and is not to be considered as an offer or invitation to apply for the product. This target market determination does not constitute an opinion, recommendation or advice that any person apply for or acquire the product and does not contain any opinion about any customers' suitability for the product.

For more information on the Residential Property Loan (NCCP) please visit: https://www.thinktank.net.au/brokers/residential-products/. The linked page is for general information only and does not form part of this Target Market Determination. It is not an offer, recommendation, or advice. Please consider your circumstances and seek advice if needed.