

Target Market Determination – Secured Business Loan

#	Criteria	Secured Business Loan	
A	Entity responsible for preparing this TMD	BNY Trust Company of Australia Limited – ABN 49 050 294 052 (“Issuer”)	
B	TMD effective date	12 February 2024	
C	Product names	Secured Business Loan	
D	Customer knowledge	Low complexity	
1	Product features & Target market description	<p>Key Features</p> <ul style="list-style-type: none"> • Loan of 3 months or more and up to 3 years in duration. • Interest only repayment with variable interest rate for life of the loan, principal is repaid on or before loan maturity. • Loan secured against one or more residential, commercial properties or vacant land. • Can be used for purchase, refinance or equity take out of residential and commercial property or vacant land for business purposes; or residual stock financing for property developers. • Loan purposes permitted including but not limited to refinance or purchase of properties or vacant land, business equipment purchase, working capital, line of credit, debt consolidation, residual stock financing etc. Personal use is not permitted. • Minimum loan amount is \$100,000. Maximum loan amount is \$5,000,000 for a loan secured by a single property or \$5,000,000 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. • Minimum property value is \$200,000. 	<p>Description of the retail class that comprises the target market</p> <p>Customers (real persons, trusts and companies) who are:</p> <ul style="list-style-type: none"> • Seeking a 3 month to – 3 year loan for the finance of a commercial owner-occupied, residential or investment property for business purposes in an urban location. • Where the customer can provide security over one or more residential or commercial properties and can afford to repay the loan (suitability assessment). • 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 and are prepared to pay a higher interest rate in return for this. • Want to repay interest only for the life of the loan, repay the principal on or before maturity, and are prepared to pay a higher rate of interest for this feature. • in respect of secured business loans which are lines of credit Customers (real persons, trusts and companies) who are (in addition to the above): <ul style="list-style-type: none"> - wanting the flexibility to redraw the facility on demand; and

		<ul style="list-style-type: none"> • The amount of the loan will also depend on the loan-to-value ratio. • National Consumer Credit Protection Act (NCCP) loans are not permitted. • Repayment frequency is monthly. Lump sum payments before loan maturity are permissible. • Redraw is permitted. 	<ul style="list-style-type: none"> - are comfortable paying a higher interest rate.
2	Description of distribution conditions and restrictions	<p>Distribution Conditions</p> <p>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:</p> <ul style="list-style-type: none"> • Brokers • Aggregators representing individual brokers • Aggregators who have entered into a White Label agreement with Think Tank allowing the Aggregator to distribute the Issuer’s products. <p>(together, the “Distributors”).</p> <p>These distribution conditions are appropriate because they are documented agreements with the relevant parties (“Distributor Agreements”) which include provisions that:</p> <ul style="list-style-type: none"> • Think Tank may accept or reject an Application at its absolute discretion • 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 parties from time to time • The Introducer must advise Members of any reasonable training requirements specified by Think Tank from time to time • 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	<p>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:</p> <ul style="list-style-type: none"> • Internal decisions to amend or modify the product, its features and/or its distribution • Any regulatory changes, including court decisions, AFCA determinations and regulatory guidance 	

	is no longer appropriate)	<ul style="list-style-type: none"> • Changes to economic conditions • An unexpected volume of loans in arrears • Significant change in customer complaints and/or feedback relating to the product. • An unexpected, significant increase in early termination of the product. • 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 first review of the determination is to finish	6 months
5	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	6 months
6	Reporting period for reporting information about the number of complaints about the product received	Distributors are required to provide information about complaints received in relation to the Secured Business Loan within 10 Business Days after the end of each calendar quarter.

<p>7</p> <p>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.</p> <p>For each type of information, specify:</p> <ul style="list-style-type: none"> - the regulated persons are required to report the Issuer; and - a reporting period for reporting the information under section 994F(5) of the Corporations Act. 	<p>The Issuer will collect the following information from each Distributor:</p>	
	<p>Complaints & Feedback</p>	
	<p>For each complaint received:</p> <ul style="list-style-type: none"> • The time and date the complaint was received • the substance of the complaint • which products the complaint relates to <p>Any other general feedback in relation to the product or its distribution</p>	<p>Within 10 Business Days of the end of each calendar quarter.</p>
	<p>Communications from regulators</p>	
<p>Any feedback from any regulator or other industry or consumer body which relates to the product or its distribution</p>	<p>As soon as practicable and in all cases within 10 business days of receipt.</p>	
<p>Significant dealings</p>		
<p>Details of any significant dealings outside the target market including information on:</p> <ul style="list-style-type: none"> • the volume of the dealing • why it is not consistent with the TMD • how it was identified • any steps taken in relation to the significant dealing outside the target market. 	<p>As soon as practicable, and in all cases within 10 business days of becoming aware of the significant dealing.</p>	

This target market determination is not a summary of the terms and conditions of the Secured Business Loan, 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 Secured Business Loan please visit: <https://www.thinktank.net.au/brokers/commercial-loan-solutions/>