TARGET MARKET DETERMINATION (TMD)

|  |  |
| --- | --- |
| Product | BC Freedom (Variable & Fixed Rate) also known as NAVY Freedom |
| Issuer | * BC Securities Pty Ltd
* ACN: 609 155 688
* Australian Credit Licence number: 482240
 |
| Version |  3.0 |
| Date of TMD |  31 March 2024 |
| Target Market | *Description of target market, including likely objectives, financial situation and needs*The features of this product have been assessed as meeting the *likely objectives, financial situation and needs* of consumers who:* meet the eligibility criteria, including:
	+ being a non-resident of Australia; and
	+ having a satisfactory credit rating;
* are:
	+ self-employed; or
	+ salaried employees;
* require a loan to fund the purchase or refinance of an owner occupied or investment residential property;
* require the option of a Full or Alt Doc;
* require the option of a variable or fixed interest rate;
* require the option of either principal and interest or interest only repayments.

*Variable Rate*Whilst variable interest rates may fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it provides consumers with the ability to make additional repayments and/or deposit funds into a sub-offset account to reduce interest payable whilst retaining the ability to draw on those funds when required. *Fixed Rate*Whilst the product has a limit on additional repayments the product meets the likely objectives, financial situation and needs of consumers in the target market because the fixed rate provides certainty of repayments during the fixed period, making consumer budgeting easier.*Owner Occupied Residential Property*This product allows consumers to finance the purchase or refinance of an owner-occupied residential property with the ability to select principal and interest or interest only repayments.*Investment Residential Property*This product allows consumers to finance the purchase or refinance of an investment property to earn rental income whilst providing consumers with the ability to select principal and interest repayments in order to reduce the overall debt and build equity or interest only for tax purposes.  |
| Product Description | Key Attributes |
| Security property | Residential  |
| Maximum loan term | 25 years |
| Maximum LVR | 75% |
| Minimum loan amount | $150,000 |
| Maximum loan amount | $2,000,000 |
| Maximum single borrower exposure | $3,000,000 |
| Repayment type | * Principal & Interest
* Interest Only
 |
| Fixed rate options | 1 – 3 years |
| Fixed rate premium | Yes (varies by years) |
| Interest only premium | Yes |
| Maximum IO period | 5 years |
| Alt Doc premium | Yes  |
| Alt Doc option | Yes |
| Large Loan Premium | Yes |
| Offset account | Yes |
| Offset account premium | No |
| Redraw | Yes, within facility limit |
| Security location | Metro & non-metro considered |
| Security | 1st registered real property mortgage |
| Application fee | Payable |
| Risk fee | Payable |
| Legal fee | Payable plus disbursements |
| Annual package fee | Payable |
| Discharge fee | Payable |
|  |
| Classes of consumers for whom the product may not be suitable |
| This product may not be suitable for consumers who* do not meet the issuer’s eligibility criteria;
* are Australian residents.
 |
| Distribution Conditions | The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:* Mortgage Managers – must be authorised to distribute this product under a Mortgage Origination and Management Agreement; and
* Mortgage brokers (subject to BID) – must be accredited by BC Invest to distribute this product

The distribution channels and conditions are appropriate because our distributors are:* subject to a higher duty under BID (mortgage brokers) to ensure that the product is in the best interests of the particular consumer
* provided with detailed product specifications to enable assessment of customer suitability and eligibility;
* trained on the BC Invest Credit Policy to support the introduction of customers and loan proposals that are consistent with this TMD and within our Credit Policy eligibility criteria;
* applications submitted by the Distribution partners include a Cover Sheet, Credit Notes and recommendation for consideration by the BC Invest Credit Officer;
* each application is assessed to ensure the application and customers eligibility and situation is appropriate for the loan applied for and consistent with this TMD; and
* loan applications are not accepted from distribution channels that are not formally authorised by the issuer.
 |
| Review Triggers | The following review triggers would reasonably suggest that the TMD may no longer be appropriate:* A significant dealing of the product to consumers outside the target market occurs;
* A consistent and regular number of complaints are received from consumers in relation to the product;
* Material changes are made to the product specification, including features, fees and BC Invest Credit Policy will trigger a review of the product TMD;
* There are high rates of refinance from BC Invest for this product;
* There are high default rates; and
* There are material regulatory changes or updated regulator guidance that may affect the TMD.
 |
| Review Periods | Next Review | March 2025 |
| Review period | Annually (end March each year) |
| Trigger Review | Within 10 business days of the identification of a trigger event. |
| Distribution Information Reporting Requirements | The following information must be provided to us by distributors who engage in retail product distribution conduct in relation to this product: |
| Type of Information | Description | Reporting Period |
| Specific complaints | Details of the complaint, including name and contact details of complainant and substance of the complaint. | As soon as practicable and within 10 business days of receipt of complaint. |
| General information about complaints | Number complaints | Every 6 months (end September & March) |
| Significant dealing(s) where the distributor believes that a significant number of customers outside the target market are obtaining this product | Date or date range of the significant dealing(s) and description of the significant dealing | As soon as practicable, and in any case within 10 business days after becoming aware |

This document should not be taken as financial product advice and has been prepared as general information only without consideration for your particular objectives, financial circumstances or needs. More information about the product can be found on our website, or in your loan contract.