



TARGET MARKET DETERMINATION

FOR VE RESIDENTIAL ALT DOC VARIABLE PRODUCT

Product	VP Non-Conforming Home Loans
Mortgage Manager	Vast Capital Pty Ltd T/A Vast Capital Mortgage Management ("VCMM") ACN 630 388 635, Australian Credit Licence 514947
Issuer	Pepper Money Limited as servicer of loans issued by Pepper Finance Corporation Limited ACN 094 317 647 Australian Financial Services Licence and Australian credit licence 286655
Date Effective	15/08/2023

ABOUT THIS DOCUMENT

This Target Market Determination (TMD) provides information about the target market for VP Non-Conforming home loan products. It outlines the likely objectives, financial situation and needs of the target market as well as the key attributes of the product.

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. Consumers must refer to the product terms and conditions detailed below when making a decision about this product:

- General Terms & Conditions
- Source Funding Pty Ltd Loan Agreement
- Mortgage Common Provisions

Target market determination date 15th August 2023.

DESCRIPTION OF TARGET MARKET, INCLUDING LIKELY OBJECTIVES, FINANCIAL SITUATION AND NEEDS

The features of this product, including its key attributes, have been assessed as meeting the likely objectives, financial situation and needs of consumers who:

- Satisfy our eligibility criteria, including (but not limited to):
 - Must be 18 years or older at the time of application.
 - Must be a resident of Australia.
 - Be able to demonstrate their capacity to repay the loan over a sustained period of time.
 - May have adverse credit history.
- Require a loan secured by owner-occupied or investment residential real property for the purpose of:
 - Purchasing residential real property.
 - Refinancing a loan secured against residential real property.
 - Accessing equity in a residential real property including for debt consolidation purposes.

Some product features may alter the target market. See below for details.

Key product features and attributes

This product has the following features and attributes:





- Variable and fixed interest rate options.
- Part fixed rate, part variable rate split loans available.
- Principal and Interest and Interest Only (IO) repayment options, IO for up to 5 years.
- 100% interest offset sub-account available with debit card access¹ on a variable rate loan.
- Maximum Loan to Value Ratio (LVR) 95%. Maximum loan size A\$5,000,000, minimum loan size A\$50,000.
- Maximum loan term 40 years, minimum loan term 10 years.
- Repayments available monthly, fortnightly and weekly.
- Ability to redraw additional repayments made on a variable rate loan.
- Access to manage loan online including BPay.
- Pricing for risk:
 - If a loan is approved, the interest rate offered and fees and charges will depend on our assessment of a number of factors at the time of application including the consumer's credit history, income and financial position, the Loan to Value Ratio, the loan term and the nature of the security property. A risk loading may apply.

• Fees and Charges

Fee	Amount(A\$)
Establishment Fee	\$995.00 (including one valuation)
Monthly Account Keeping Fee	\$15.00 per account split
Fixed Rate Lock Fee	\$950.00 if loan amount less than \$500,000, 0.15% of settled loan balance if greater than \$500,000
Legal Fee	From \$330.00 (incl GST) plus disbursements
Discharge Fee	\$500.00 plus costs and expenses
Title Protection Fee	\$0.00 -\$400.00 variable, based on loan and borrower characteristics
Mortgage Risk Fee	Variable, based on loan and borrower characteristics

Other fees and charges may apply, as set out in the loan agreement.

Sub target market for consumers with 100% interest offset sub-account feature

This feature is likely to be appropriate for consumers within the target market who:

- Have surplus cash and want to use this to reduce the interest payable on their loan while retaining access to their money.
- Want the availability of a Visa debit card¹ for everyday access to additional funds held in the offset sub-account, including at ATMs.

The offset sub-account feature is not available with a fixed interest rate loan.

Sub target market for consumers with a variable interest rate home loan

This feature is likely to be appropriate for consumers within the target market who:

- Will benefit from the additional loan features available with a variable interest rate loan who understand and are able to manage repayments which can change at any time.
- Are likely to have the ability to make extra repayments, at any time, up to the outstanding loan amount.

¹ Visa debit card issued by Indue Limited ABN 97 087 822 464 and distributed by Pepper Finance Corporation Limited ACN 094 317 647 and/or through Pepper Money accredited mortgage brokers.





Consumers can choose to have a split loan with a variable interest rate and fixed interest rate portion providing repayment certainty in relation to the fixed interest rate portion and the ability to have an offset sub-account, redraw facility and Visa debit card¹ available on the variable interest rate portion.

Sub target market for consumers with a fixed interest rate home loan

This feature is likely to be appropriate for consumers within the target market who:

- Require the certainty of a fixed interest rate and fixed repayments for a fixed period up to 10 years, understanding that they will not benefit from interest rate decreases during the fixed rate period.
- Will not need access to any additional repayments made to their loan during the fixed interest rate period.
- Benefit from having the repayment certainty offered by a fixed rate even though any additional repayments made during the fixed interest period cannot be accessed.
- May need to break their fixed rate loans prior to the end of the fixed period and will benefit from a product which does not charge break costs.
- May want to have an IO period during the period of the fixed interest rate.

Consumers can choose to have a split loan with a variable interest rate and fixed interest rate portion providing repayment certainty in relation to the fixed interest rate portion and the ability to have an offset sub-account, redraw facility and Visa debit card¹ available on the variable interest rate portion.

Consumers have the option to lock in a fixed interest rate at application stage (fees apply).

Sub target market for consumers with Principal and Interest loan repayment

This feature is likely to be appropriate for customers within the target market who:

- Want to pay down their outstanding loan balance on a regular basis in addition their interest repayments, to save on interest over the term of the loan and build equity in the property.

Sub target market for consumers with an Interest Only loan repayment

This feature is likely to be appropriate for consumers within the target market who:

- Want to pay down their outstanding loan balance on a regular basis in addition their interest repayments, to save on interest over the term of the loan and build equity in the property.

Purchase or refinance of an owner-occupied residential property²

This product allows consumers to finance the purchase or refinance of an owner-occupied residential property and make principal and interest repayments in order to reduce the loan balance and build equity in the property.

Purchase or refinance of an investment residential property²

This product allows consumers to finance the purchase or refinance of an investment residential property with the ability to select principal and interest repayments to reduce the loan balance and build equity or interest only repayments for a maximum of 5 years for tax purposes.

² The maximum term, loan size, fees and charges and Loan to Valuation Ratio will vary depending on the consumer's circumstances, including the method of income validation and credit history. E.g., discharged bankrupt or defaults. Refer to the key product attributes to ensure that the available product options meet the consumer's likely objectives,





Access equity²

This product allows consumers to access part of the equity in their owner occupied or investment residential property to use the funds for an approved purpose in accordance with our lending criteria.

Acceptable purposes include purchasing another property, home improvement, debt consolidation or investment.

Customers for whom this product may not be appropriate

This product may not be appropriate for individuals who:

- Do not satisfy our non-conforming home loan eligibility criteria;
- May qualify for our Prime home loan product;
- Need to borrow greater than 95% Loan to Valuation Ratio;
- Require a loan term greater than 40 years;
- Are borrowing to construct a dwelling.
- Do not have ongoing income and/or employment.
- Cannot demonstrate their capacity to repay debt over a sustained period; and/or
- Require a line of credit facility.

VCMM may also exclude customers based on factors including, but not limited to, loan purpose.

HOW THIS PRODUCT IS TO BE DISTRIBUTED

Distribution channels and conditions

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

- VCMM through its accredited and licensed mortgage brokers subject to Best Interests Duty and Licensed Intermediaries (**Third Party Channel**); and
- Directly via appropriately authorised VCMM employees or credit representatives (**Direct Channel**).

The distribution channels are appropriate because:

- The product has a wide target market.
- VCMM's Third-Party Channel consists of accredited mortgage brokers that are subject to a higher duty under Best Interests.
- VCMM's Direct Channel distributors have been adequately trained and have the necessary skills and knowledge to distribute this product in accordance with the TMD.
- VCMM's application and approval process has controls in place to ensure all approved consumers meet our eligibility and lending requirements.
- VCMM's conduct adequate training, upfront and ongoing due diligence and monitoring of distributors including the ongoing provision of information to these distributors.

REVIEWING THIS TARGET MARKET DETERMINATION

We will review this TMD in accordance with the following:

Review periods

- **First review date:** within twelve months of the effective date.
- **Periodic reviews:** every twelve months after the initial review and each subsequent review.





Review triggers

This TMD will be reviewed if any of the events should occur:

- There is a material change to the product including to the fees or the terms and conditions of the product, except where the TMD has already been reviewed in relation to that change;
- There is a material change in the regulatory requirements in relation to the product, except where the TMD has already been reviewed in relation to that change
- A significant dealing of the product to consumers outside the target market occurs;
- External events such as adverse media coverage or regulatory attention suggest that the target market for the product might not be appropriate;
- There is a material, unexpected increase in complaints, declined applications, clients in default or hardship when measured against approved metrics, determined by reference to our Design and Distributions Obligations (DDO Policy); or
- We receive correspondence from a regulator, including a regulatory order or direction (including the use by ASIC of its Product Intervention Powers) that expressly states or directly implies that this TMD is no longer appropriate.

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

REPORTING AND MONITORING THIS TARGET MARKET DETERMINATION

The following information must be provided by VCMM to Pepper Money in relation to the distribution conduct of the VP Home Loan product, if not available to Pepper Money.

VCMM should provide all reporting to ddoreporting@pepper.com.au.

Type of Information	Description	Reporting Period
Complaints received in relation to the product, Pepper Money or VCMM	Written details of the complaint, including name and contact details of the complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days* from the end of the quarter or from receiving a request from Pepper Money.
Significant dealings	Any significant dealing which is not consistent with this TMD including: <ul style="list-style-type: none"> • The date on which or the date range over which the dealing occurred; • A description of the dealing; • An explanation of why the dealing is considered significant; • An explanation of why the dealing is considered to be inconsistent with the TMD; • How the dealing was identified (e.g., through monitoring, complaints etc.); and • Detail of what steps have been or will be taken in relation to the significant dealing 	As soon as practicable, and in any case within 10 business days* after becoming aware

*Business day is a day that is not a Saturday or Sunday, a public holiday or bank holiday in New South Wales.





DOCUMENT CONTROL

Version	Start Date	Comments
1.0	15/08/2023	

