Target Market Determination - Commercial SMSF Loan - Variable

Date: 20/02/2024

This Target Market Determination (**TMD**) has been prepared in accordance with the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019* (Cth) and associated Regulations.

TMDs are designed to assist issuers to ensure that the financial products they issue are likely to be consistent with the *likely objectives, financial situation and needs* of the consumers for whom they are intended (the target market) and to assist distributors to ensure that financial products are distributed to the target market.

This TMD is general in nature and should not be construed as financial advice. Consumers should obtain independent advice prior to acquiring the product to ensure that it is appropriate for their particular *objectives, financial situation and needs*.

Product	
	Commercial SMSF Loan - Variable
Issuer	Firstmac Limited ACN 094 145 963 Australian Credit Licence 290600
Target Market	 Consumers with a self-managed superannuation fund Consumers who have a 20% deposit or sufficient equity to require a loan of under 80% LVR (for up to 80% LVR limit) Consumers who are purchasing or refinancing a commercial property owned by a property trust as security Consumers who want to save money with a low rate and no ongoing fees Consumers who do not require a debit card and offset subaccount
	Explanation of why the product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market
	The Product is likely to be consistent with the <i>likely objectives</i> , financial situation and needs of consumers in the target market because the Product will enable consumers in the target market to purchase or refinance a commercial property through their self-managed superannuation fund at a cost that is reasonable and affordable with respect to their financial situation. The Product is also consistent with the needs and objectives of consumers who require the ability to make additional repayments.
	Description of likely objectives, financial situation and needs of consumers in the target market
	The Product has been assessed as meeting the likely objectives, financial situation and needs of consumers who: <u>Likely objectives</u> : require a loan to purchase or refinance a commercial property through their self-managed superannuation fund, with P&I repayments. <u>Likely financial situation</u> : meet our eligibility criteria, including (but not limited to): • are 18 years of age or older; • have ongoing and stable employment; and • can afford to make the required repayments.

	Likely needs: need funds to cover the purchase or refinance a commercial property through their self-managed superannuation fund. Description of product and key attributes • Minimum loan amount of \$100,000, maximum loan amount of \$2 million; • Minimum loan term of 15 years, maximum loan term of 30 years; • Repayment on weekly, fortnightly or monthly basis; • Unlimited additional repayments if variable interest rate; and • Fees: • Security Assessment fee – at cost; and • Legal fee of \$490 for purchase, nil if refinance.
	Classes of consumers for whom the product may not be suitable
	This product is unlikely to meet the needs, objectives and financial situation of consumers who do not meet our eligibility criteria.
Restrictions on distribution	This product should not be distributed to consumers who do not meet the credit requirements for this loan
Review triggers	The events that may suggest that the TMD is no longer appropriate includes: • If the product details or terms and conditions change;
	 If the credit guidelines change; if a significant dealing of the Product to consumers outside the target market occurs; or if there are a significant number of complaints received
	from consumers in relation to the Product that reasonably suggests that the TMD is no longer appropriate.
Review periods	The first review will occur 12 months after the introduction of this TMD, and this TMD will should be reviewed every 12 months thereafter.
Distribution information	Distributors must provide the issuer with the following information:
reporting requirements	 the details of any complaint received, as well as the number of complaints received in every quarter ending on 31 December, 31 March, 30 June and 30 September; and Any dealings in the Product which is not consistent with the TMD. This information must be provided as soon as practicable, and in any case within 10 business days after becoming aware.