



Target Market Determination

for Expat – Owner Occupier Variable

1 Product

Expat – Owner Occupier Variable

2 Issuer

Columbus Capital Pty Ltd ACN 119 531 252, Australian Financial Services Licence and Australian Credit Licence 337303 (**Columbus**)

("Columbus/we/us")

3 Version No.

2021.2

4 Date effective

5 October 2021

5 About the TMD

This Target Market Determination (TMD) document is not intended to provide financial advice. Please refer to our Terms and Conditions and Credit Guide before deciding product suitability. Our product terms and conditions will be provided to you upon request.

This TMD aims to provide an understanding of the class of customers we have designed this product for, being the target market. When considering the target market, we focused on our customers' objectives, financial situation, and needs within this class of people we believe this product to be suitable.

6 Target Market

6.1 Description of target market

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

- are:
 - at least 18 years old;
 - individual borrowers (as single or joint borrowers); and
 - an Australian Citizen or a Permanent or Temporary Resident of Australia with an Acceptable Visa that does not reside in Australia or a New Zealand Citizen that does not reside in Australia or New Zealand;
- require a loan to purchase or refinance an owner-occupied property and who may also wish to release some of the equity in their property for other purposes such as to consolidate debt or to be used for personal or investment purposes;



Target Market Determination

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- require an offset account;
- require the use of a Visa Debit card;
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;
 - **Expat - Class A**
Permanent Residents (PR) and Temporary Residents (TR) with acceptable visas with Australian Income sufficient to cover 100% of the Interest Expense of the Loan

 - Expat - Class B**
Permanent Residents (PR) with acceptable visas living in Australia with a minimum of 50% income used in servicing earned in Australia

 - Expat - Class C**
Australian Citizens living and working outside of Australia applying with Non-Resident consumers with a minimum of 50% of income used in servicing contributed by the Australian Citizens

Although variable interest rates fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

6.2 Classes of consumers for who the product may not be suitable

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are seeking the certainty of fixed repayments over the term of the loan;
- are looking to purchase or refinance a residential investment property;
- are looking to construct a property; or
- require the ability to provide alternative methods of income verification.

6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
 - principle and interest; or
 - interest only



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- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR: 80%
- Offset facility available
- Application fee is payable
- Settlement fee is payable
- Valuation fee is payable
- Ongoing annual facility fee is payable

7 Distribution Conditions/ Restrictions

The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:

- Direct
 - Online
 - By phone
 - In person (e.g. branch, agency, or premises visit)
- Third party – Accredited mortgage brokers subject to Best Interests Duty (BID)

The distribution channels and conditions are appropriate because:

- the product has a wide target market;
- our staff have the necessary training, knowledge and accreditation (if required) to assess whether the consumer is within the target market. All of our staff must continually satisfy annual compliance reviews.
- we rely on existing distributors, methods, controls and supervision already in place;
- our approval system has checks and controls in place to flag applicants who may be outside the target market; and
- accredited mortgage brokers are subject to a higher duty under BID to ensure that the product is in the best interests of the particular consumer.

8 TMD Reviews

We will review this TMD as follows:



Target Market Determination

for Expat – Owner Occupier Variable

Initial review	Within 12 months of the date of this TMD
Periodic review	Each year on the anniversary of this TMD.
Review triggers	<p>Specific events will prompt Columbus to review this TMD, which includes:</p> <ul style="list-style-type: none"> - A significant dealing of the product to consumers outside the target market occurs; - A significant number of complaints are received from customers in relation to the product; - A significant number of defaults occur; - A significant breach has occurred in connection with the issuing and distribution of this product; and - A significant number of late repayments are being recorded; - A material change is made to this product. - Unexpected early stage arrears are detected

If a review trigger occurs, we will complete a review of the TMD within ten business days. Meanwhile, we will cease to offer this product to our customers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

9 Monitoring and reporting of this TMD

The following data must be provided to us by any person who engages 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.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware



Target Market Determination

for Expat – Owner Occupier Fixed

1. Product

Expat – Owner Occupier Fixed

2. Issuer

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3. Version No.

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 - an Australian Citizen or a Permanent or Temporary Resident of Australia with an Acceptable Visa that does not reside in Australia or a New Zealand Citizen that does not reside in Australia or New Zealand;
- require a loan to purchase or refinance an owner-occupied property and who may also wish to release some of the equity in their property for other purposes such as to consolidate debt or to be used for personal or investment purposes;
- require an offset account;



Target Market Determination

for Expat – Owner Occupier Fixed

- require the certainty of a fixed interest rate;
- are able to make up to \$20k of extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;
 - **Expat - Class A**
Permanent Residents (PR) and Temporary Residents (TR) with acceptable visas with Australian Income sufficient to cover 100% of the Interest Expense of the Loan

 - **Expat - Class B**
Permanent Residents (PR) with acceptable visas living in Australia with a minimum of 50% income used in servicing earned in Australia

 - **Expat - Class C**
Australian Citizens living and working outside of Australia applying with Non-Resident consumers with a minimum of 50% of income used in servicing contributed by the Australian Citizens

The product meets the likely objectives, financial situation and needs of consumers in the target market because it provides them with the certainty of a fixed rate for an initial period of time, allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable up to \$20k additional per annum whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

6.2 Classes of consumers for who the product may not be suitable

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are looking to purchase or refinance a residential investment property;
- are looking to construct a property; or
- require the ability to provide alternative methods of income verification.

6.3 Description of the Product, including key attributes

- Fixed interest rate;
- Repayment options:
 - principle and interest; or
 - interest only
- Redraw available
- Able to make up to \$20k of extra repayments without penalty
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)



Target Market Determination

for Expat – Owner Occupier Fixed

- Maximum LVR: 80%
- Offset facility available
- Application fee is payable
- Settlement fee is payable
- Valuation fee is payable
- Ongoing annual facility fee is payable

7. Distribution Conditions/ Restrictions

The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:

- Direct
 - Online
 - By phone
 - In person (e.g. branch, agency, or premises visit)
- Third party – Accredited mortgage brokers subject to Best Interests Duty (BID)

The distribution channels and conditions are appropriate because:

- the product has a wide target market;
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- we rely on existing distributors, methods, controls and supervision already in place;
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- accredited mortgage brokers are subject to a higher duty under BID to ensure that the product is in the best interests of the particular consumer.

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Target Market Determination

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- require a loan to purchase or refinance an investment property and who may also wish to release some of the equity in their property for other purposes such as to consolidate debt or to be used for personal or investment purposes;
- require an offset account;



Target Market Determination

for Expat – Investment Variable

- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;
 - **Expat - Class A**
Permanent Residents (PR) and Temporary Residents (TR) with acceptable visas with Australian Income sufficient to cover 100% of the Interest Expense of the Loan

 - Expat - Class B**
Permanent Residents (PR) with acceptable visas living in Australia with a minimum of 50% income used in servicing earned in Australia

 - Expat - Class C**
Australian Citizens living and working outside of Australia applying with Non-Resident consumers with a minimum of 50% of income used in servicing contributed by the Australian Citizens

Although variable interest rates fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

6.2 Classes of consumers for who the product may not be suitable

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are seeking the certainty of fixed repayments over the term of the loan;
- are looking to purchase or refinance a residential owner occupied property;
- are looking to construct a property; or
- require the ability to provide alternative methods of income verification.

6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
 - principle and interest; or
 - interest only
- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR: 80%
- Offset facility available



Target Market Determination

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- Application fee is payable
- Settlement fee is payable
- Valuation fee is payable
- Ongoing annual facility fee is payable

7 Distribution Conditions/ Restrictions

The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:

- Direct
 - Online
 - By phone
 - In person (e.g. branch, agency, or premises visit)
- Third party – Accredited mortgage brokers subject to Best Interests Duty (BID)

The distribution channels and conditions are appropriate because:

- the product has a wide target market;
- our staff have the necessary training, knowledge and accreditation (if required) to assess whether the consumer is within the target market. All of our staff must continually satisfy annual compliance reviews.
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Target Market Determination

for Expat – Investment Fixed

1. Product

Expat – Investment Fixed

2. Issuer

Columbus Capital Pty Ltd ACN 119 531 252, Australian Financial Services Licence and Australian Credit Licence 337303 (**Columbus**)

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 - an Australian Citizen or a Permanent or Temporary Resident of Australia with an Acceptable Visa that does not reside in Australia or a New Zealand Citizen that does not reside in Australia or New Zealand;
- require a loan to purchase or refinance an investment property and who may also wish to release some of the equity in their property for other purposes such as to consolidate debt or to be used for personal or investment purposes;
- require an offset account;



Target Market Determination

for Expat – Investment Fixed

- require the certainty of a fixed interest rate;
- are able to make up to \$20k of extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;
 - **Expat - Class A**
Permanent Residents (PR) and Temporary Residents (TR) with acceptable visas with Australian Income sufficient to cover 100% of the Interest Expense of the Loan

 - Expat - Class B**
Permanent Residents (PR) with acceptable visas living in Australia with a minimum of 50% income used in servicing earned in Australia

 - Expat - Class C**
Australian Citizens living and working outside of Australia applying with Non-Resident consumers with a minimum of 50% of income used in servicing contributed by the Australian Citizens

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6.2 Classes of consumers for who the product may not be suitable

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are looking to construct a property; or
- require the ability to provide alternative methods of income verification.

6.3 Description of the Product, including key attributes

- Fixed interest rate;
- Repayment options:
 - principle and interest; or
 - interest only
- Redraw available
- Able to make up to \$20k of extra repayments without penalty
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR – 80%



Target Market Determination

for Expat – Investment Fixed

- Offset facility available
- Application fee is payable
- Settlement fee is payable
- Valuation fee is payable
- Ongoing annual facility fee is payable

7. Distribution Conditions/ Restrictions

The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:

- Direct
 - Online
 - By phone
 - In person (e.g. branch, agency, or premises visit)
- Third party – Accredited mortgage brokers subject to Best Interests Duty (BID)

The distribution channels and conditions are appropriate because:

- the product has a wide target market;
- our staff have the necessary training, knowledge and accreditation (if required) to assess whether the consumer is within the target market. All of our staff must continually satisfy annual compliance reviews.
- we rely on existing distributors, methods, controls and supervision already in place;
- our approval system has checks and controls in place to flag applicants who may be outside the target market; and
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8. TMD Reviews

We will review this TMD as follows:



Target Market Determination for Expat – Investment Fixed

Initial review	Within 12 months of the date of this TMD
Periodic review	Each year on the anniversary of this TMD.
Review triggers	<p>Specific events will prompt Columbus to review this TMD, which includes:</p> <ul style="list-style-type: none"> - A significant dealing of the product to consumers outside the target market occurs; - A significant number of complaints are received from customers in relation to the product; - A significant number of defaults occur; - A significant breach has occurred in connection with the issuing and distribution of this product; and - A significant number of late repayments are being recorded; - A material change is made to this product. - Unexpected early stage arrears are detected

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Target Market Determination

for Expat Construction – Owner Occupied Variable

1. Product

Expat Construction – Owner Occupied Variable

2. Issuer

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- are:
 - at least 18 years old;
 - individual borrowers (as single or joint borrowers); and
 - an Australian Citizen or a Permanent or Temporary Resident of Australia with an Acceptable Visa that does not reside in Australia or a New Zealand Citizen that does not reside in Australia or New Zealand;
- require a loan build a new owner-occupied home, renovate or demolish and rebuild an owner-occupied property;



Target Market Determination

for Expat Construction – Owner Occupied Variable

- Interest Only option available during construction phase (max 12 months) reverting to Principal & Interest.
- require an offset account;
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;
 - **Expat - Class A**
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Although variable interest rates fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

6.2 Classes of consumers for who the product may not be suitable

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are seeking the certainty of fixed repayments over the term of the loan;
- are looking to purchase or refinance an investment property;
- are looking to purchase or refinance an existing residential owner occupied property; or
- require the ability to provide alternative methods of income verification.

6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
 - principle and interest; or
 - interest only
- Redraw available
- Minimum loan size: \$50,000



Target Market Determination

for Expat Construction – Owner Occupied Variable

- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR: 75%
- Offset facility available
- Application fee is payable
- Settlement fee is payable
- Valuation fee is payable
- Ongoing annual facility fee is payable

7. Distribution Conditions/ Restrictions

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 - at least 18 years old;
 - individual borrowers (as single or joint borrowers); and
 - an Australian Citizen or a Permanent or Temporary Resident of Australia with an Acceptable Visa that does not reside in Australia or a New Zealand Citizen that does not reside in Australia or New Zealand;
- require a loan build a new investment home, renovate or demolish and rebuild an investment property;



Target Market Determination

for Expat Construction – Investment Variable

- Interest Only option available during construction phase (max 12 months) reverting to Principal & Interest.
- require an offset account;
- require the flexibility of a variable interest rate;
- require the ability to make additional extra repayments without penalty; and
- want the option of either principal and interest or interest only repayments.
- satisfy our eligibility criteria;
 - **Expat - Class A**
Permanent Residents (PR) and Temporary Residents (TR) with acceptable visas with Australian Income sufficient to cover 100% of the Interest Expense of the Loan

 - **Expat - Class B**
Permanent Residents (PR) with acceptable visas living in Australia with a minimum of 50% income used in servicing earned in Australia

 - **Expat - Class C**
Australian Citizens living and working outside of Australia applying with Non-Resident consumers with a minimum of 50% of income used in servicing contributed by the Australian Citizens

Although variable interest rates fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to deposit funds into an offset account and/or make additional payments directly into the loan to reduce the amount of interest payable whilst maintaining the ability to draw on surplus funds when required. This product also allows consumers to select interest only or principal and interest repayments in order to reduce their overall debt and build equity.

6.2 Classes of consumers for who the product may not be suitable

This product may not be suitable for consumers who:

- do not meet the eligibility requirements;
- are seeking the certainty of fixed repayments over the term of the loan;
- are looking to purchase or refinance a residential owner occupied property;
- are looking to purchase or refinance an existing investment property; or
- require the ability to provide alternative methods of income verification.

6.3 Description of the Product, including key attributes

- Variable interest rate;
- Repayment options:
 - principle and interest; or
 - interest only



Target Market Determination

for Expat Construction – Investment Variable

- Redraw available
- Minimum loan size: \$50,000
- Maximum Loan Size: \$2,000,000 (subject to LVR and postcode policy)
- Maximum LVR: 75%
- Offset facility available
- Application fee is payable
- Settlement fee is payable
- Valuation fee is payable
- Ongoing annual facility fee is payable

7. Distribution Conditions/ Restrictions

The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:

- Direct
 - Online
 - By phone
 - In person (e.g. branch, agency, or premises visit)
- Third party – Accredited mortgage brokers subject to Best Interests Duty (BID)

The distribution channels and conditions are appropriate because:

- the product has a wide target market;
- our staff have the necessary training, knowledge and accreditation (if required) to assess whether the consumer is within the target market. All of our staff must continually satisfy annual compliance reviews.
- we rely on existing distributors, methods, controls and supervision already in place;
- our approval system has checks and controls in place to flag applicants who may be outside the target market; and
- accredited mortgage brokers are subject to a higher duty under BID to ensure that the product is in the best interests of the particular consumer.

8. TMD Reviews

We will review this TMD as follows:



Target Market Determination

for Expat Construction – Investment Variable

Initial review	Within 12 months of the date of this TMD
Periodic review	Each year on the anniversary of this TMD.
Review triggers	<p>Specific events will prompt Columbus to review this TMD, which includes:</p> <ul style="list-style-type: none"> - A significant dealing of the product to consumers outside the target market occurs; - A significant number of complaints are received from customers in relation to the product; - A significant number of defaults occur; - A significant breach has occurred in connection with the issuing and distribution of this product; and - A significant number of late repayments are being recorded; - A material change is made to this product. - Unexpected early stage arrears are detected

If a review trigger occurs, we will complete a review of the TMD within ten business days. Meanwhile, we will cease to offer this product to our customers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

9. Monitoring and reporting of this TMD

The following data must be provided to us by any person who engages 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.
Complaints	Number of complaints	Every 6 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware