Design and Distribution Obligations (DDO)

The design and distribution obligations commenced on 5th October 2021.

The DDO's require distributors of financial products to ensure that consumers obtain products that are likely to be consistent with consumers' needs, objectives and in line with their financial situation.

Target Market Determinations (TMD)

What is a Target Market Determination?

A TMD is a document that describes the type of customer one of our products may suit (target market), including conditions and circumstances around how the product can be distributed.

In addition, circumstances and or events that may occur which require the TMD (and target market) to be reviewed.

FinSecure Finance – Our TMD's

FinSecure Finance acts as an intermediary between the program manager/wholesaler and the consumer. In this process our product offering is rebranded to reflect the retail offering presented to the consumer. The following TMD represents our product offering and the equivalent product name given by the program manager:

Product Name	TMD
FinComplete Specialist	Specialist Full Doc

Following is the TMD for the product to which you are considering/applied for OR settled on.

Target market determination

This Target Market Determination (TMD) is issued by Perpetual Trustee Company Limited ACN 000 001 007 ('Perpetual') and managed by Resimac Limited ACN 002 997 935 Australian Credit Licence 247283.

Product - this TMD applies to:

- Specialist Full Doc

Effective date: 10 August 2026

This TMD describes the class of customers for which this product has been designed, having regard to the likely objectives, financial situation and needs of customers in the target market. This document is not a complete summary of the product's terms and conditions and other disclosure documents. Further information about this product can be found on the Resimac website and in the Resimac home loan terms and conditions.

Target market

The below table matches the product attributes to the objectives and needs of the target market for this Product. Resimac has assessed that the product including its key attributes are likely to be consistent with the objectives and needs of the target market.

Objectives and needs	Product attributes
Require a product with a range of features including repayments that can vary over the life of the loan.	• The home loan account has a variable interest rate meaning that repayments will vary based on changes to the interest rate. • Customers can also elect to fix their loan after settlement for periods of 1-5 years.
Require a home loan for any of the following purposes: • Purchase or refinancing an owner occupied or investment residential property. • Equity release or consolidation of personal debt.	• The loan amount can be used for any one or more of the listed purposes.
Ability to make unlimited payments in excess of the required monthly repayment amount.	• Unlimited additional repayments (including the ability to pay the loan out early) can be made without additional charge (unless a fixed rate applies). Additional repayments made cannot exceed the outstanding loan limit. • Additional repayments are not allowed during any fixed rate period.
Access to a redraw facility.	• The home loan account has a redraw facility which enables customers to access additional repayments made over and above the minimum required repayments. Redraw is not available during any fixed rate period.
Objectives and needs	**Product attributes**
Ability to switch between principal and interest and interest only repayments.	• Subject to approval, a customer can switch between principal and interest and interest only repayments (conditions apply).

Offset.	• 100% offset available.
May want to access redraw via a Visa debit card.	• Customers can request a Visa debit card.

Financial situation

Customers in the target market are expected to have stable and regular income, sufficient savings or equity where required, be able to tolerate changes in interest rates and resulting repayment fluctuations without substantial hardship.

Eligibility criteria for the product

- Borrowers must be individuals aged 18 years and over; Company and Discretionary trusts (no Unit or Hybrid trusts), or companies registered in Australia; and
- Borrowers who have material adverse credit and fall outside the standard lending guidelines; and
- Are PAYG or self-employed and can provide sufficient financial information to support serviceability (at origination); and
- Must meet the residency and citizenship requirements in accordance with Resimac's credit policy; and Borrowers must meet credit criteria which includes demonstrating the ability to meet repayment obligations; and
- Loan must be secured by Australian residential property. Residential vacant land is not acceptable as sole security and may only be provided as collateral security in conjunction with Australian residential property.

This product is not designed for customers who:

- Require a loan to finance the acquisition of property for construction purposes;
- Borrowers who do not have material adverse credit or do not fall outside the standard lending guidelines and cannot provide sufficient financial information to support serviceability;
- Are self-employed borrowers who require alternative methods of income verification to support serviceability (at origination);
- Are seeking to borrow through a self-managed superannuation fund.

Distribution conditions

This product can only be distributed to retail customers in accordance with Resimac's product and process requirements and in a manner that is consistent with this TMD.

All customers must satisfy Resimac's credit assessment criteria which demonstrates the customers capacity to service the credit facility.

Resimac's view is that the conditions specified below are appropriate and that most of the customers who acquire the products will likely be in the target market if distributed in accordance with them.

Distribution channels	Conditions that make product distribution through the channel appropriate
Accredited mortgage brokers directly to consumers ('Broker direct channel')	Resimac only permits third parties to distribute this product who are approved and their authorised brokers / mortgage originators have been accredited by Resimac. Resimac also requires that: • Aggregators and mortgage originators responsible for mortgage brokers comply with their agreement with Resimac and take reasonable steps to: □ Ensure they meet Resimac's mortgage broking requirements; and
Mortgage brokers through accredited aggregators to consumers ('Broker channel')	

Accredited: • Mortgage originators to consumers; or • Mortgage brokers through accredited mortgage originators direct to consumers ('MO channel')	Comply with their legal obligations, which includes the obligation for brokers to act in the best interests of their client when providing credit assistance. • Mortgage brokers meet Resimac's accreditation requirements which include holding appropriate qualifications, industry membership and authorisations to engage in credit activities as well as completion of background checks. If aggregators, mortgage originators or mortgage brokers fail to comply with the above requirement, it may result in Resimac terminating their authority to distribute these products.

Distributors reporting requirements

Third party distributors of these products must provide Resimac with the following information in writing.

Complaints	Distributors will report all complaints in relation to the products covered by this TMD within 10 days of the receipt of the complaint, and for all other complaints about the distribution of the product including conduct complaints on a quarterly basis within 10 business days after receipt of Resimac's quarterly email survey. This will include written details of the complaints.
Significant dealings	Distributors will report if they become aware of a significant dealing in relation to this TMD that is inconsistent with this TMD within 10 business days of the date of the distributor becoming aware of the significant dealing.

Review of this target market determination This TMD will be reviewed as follows:

Initial review	Within 12 months of the initial date of this Target Market Determination
Schedule review	At least every two years

Review triggers

If any of the below review triggers occur, or if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate, Resimac will undertake a review of this TMD.

Type	Description
Complaints	An unexpected and significant increase in complaint volumes related to the customers purchase or use of the product, such as distribution, suitability or product attributes.
Refinances and discharges	An unexpected and significant increase in discharge and refinance rates within 6 months of settlement.
Hardship and or arrears	An unexpected and significant increase in the number of customers in hardship arrangements and or arrears within first 12 months of settlement.
Incidents	A material incident or significant number of incidents in relation to the product's design or distribution that identify breaches of our Design and Distribution obligations.
Changes to the product	Implementation of a material change to the product, including material changes to the Terms and Conditions of the product.
Significant dealings	Resimac reporting a significant dealing related to this product to ASIC.

Regulatory change	A material change in laws, regulatory guidance or ASIC expectations relevant to the product or its distribution.
Notification from ASIC	Receipt or notice from ASIC in relation to this TMD.