

# Target Market Determination

## Fully Drawn Commercial Loan (SMSF)

Category	Description	
Product	<b>Fully Drawn Commercial Loan (SMSF)</b> A credit facility for a corporate trustee of a self-managed superannuation fund ( <b>SMSF</b> ) to acquire an asset in accordance with section 67A of the <i>Superannuation Industry Supervision Act 1993</i> (Cth) ( <b>SIS Act</b> ), or to refinance an existing facility that is for this purpose.	
Issuer	Issued by IMB Ltd trading as IMB Bank ABN 92 087 651 974, AFSL/Australian Credit Licence 237 391	
Version	2.0	
Start Date	5 October 2021	
Review Date	The first review date of this determination is 5 October 2022. Each ongoing review, must be completed within each consecutive 24-month period from the first review date.	
<b>Target Market</b> Class of consumers that comprise the target market for the product	<b>Consumer Description</b> This describes consumers in the target market	<b>Objectives &amp; Needs</b> A corporate trustee of a SMSF that may require a credit facility: <ul style="list-style-type: none"> <li>to acquire an asset in accordance with section 67A of the SIS Act, or to refinance an existing facility that is for this purpose;</li> <li>that either:               <ul style="list-style-type: none"> <li>takes advantage of potential future decreases in an interest rate, and has flexibility to make additional repayments and/or repay the facility early (subject to an early termination fee in the first three years) (<b>flexible facility</b>); or</li> <li>has certainty of repayments for a fixed period during which the person does not consider that they may want to make substantial additional repayments or repay the facility (<b>certain facility</b>).</li> </ul> </li> </ul> <b>Financial Situation</b> A corporate trustee of a SMSF that will have funds to make payment of fees, interest and repayments as and when such amounts become due and payable.
	<b>Product Description</b> This describes the product	A credit facility with the following key attributes: <ul style="list-style-type: none"> <li>the ability to use the credit to acquire an asset in accordance with section 67A of the SIS Act, or to refinance an existing facility that is for this purpose;</li> <li>either:               <ul style="list-style-type: none"> <li>a variable rate with flexibility to make additional repayments (including early repayment of the facility (subject to an early termination fee in the first three years)) (<b>variable rate option</b>); or</li> <li>a fixed rate for an initial fixed period with certainty of repayments (which reverts to a variable rate unless it is agreed to refix the rate) (<b>fixed rate option</b>); and</li> </ul> </li> <li>the requirement to make payment of fees (including an early termination fee if the facility is repaid in the first three years), interest and repayments.</li> </ul> In general, it is only available to consumers that meet standard eligibility criteria such as consumers that are corporate trustees of a registered SMSF.

	<b>Appropriateness Statement</b> This explains why the product is consistent with the likely objectives, financial situation and needs of the target market	The product is appropriate for the target market on the basis that the key attributes of the product listed in this determination are consistent with the objectives, financial situation and needs of consumers in the target market as described in this determination.
<b>Distribution Conditions</b> The conditions and restrictions on the distribution of the product	<b>Marketing and Promotion</b> This condition applies to marketing and promotional materials that describe the product	<b>Condition 1</b> A distributor must only market and promote the product through: <ul style="list-style-type: none"> <li>• advertising targeted to trustees of SMSFs on television, radio, the internet (including social media), billboards and physical banners, brochures and other marketing material available to the general public;</li> <li>• in person recommendations to access marketing material; and</li> <li>• any other issuer approved communication channels (including telephone, email and social media).</li> </ul> This condition is appropriate as the target market is limited to corporate trustees of SMSFs.
	<b>Retail Product Distribution Conduct (other than Marketing)</b> This condition applies to all conduct (other than marketing) such as issuing, arranging and providing disclosure material	<b>Condition 2</b> A distributor must only engage in retail product distribution conduct (other than marketing and promotion activity) through: <ul style="list-style-type: none"> <li>• in person communications;</li> <li>• the issuer's and other approved third-party digital platforms; and</li> <li>• any other issuer approved communication channels (including telephone, email and social media).</li> </ul> This condition is appropriate as the target market is wide. It is also appropriate as the issuer has distributed this product using these methods, with limited risk to consumers.
		<b>Condition 3</b> A distributor must only engage in retail product distribution conduct (other than general advice) if it: <ul style="list-style-type: none"> <li>• has identified the key difference between the product and other separate credit products issued by the issuer; and</li> <li>• is reasonably satisfied that the consumer will have funds to make payment of fees, interest and repayments as and when such amounts become due and payable.</li> </ul> This condition is appropriate as it requires a distributor to confirm that the consumer is in the target market.
		<b>Condition 4</b> A distributor must only engage in retail product distribution conduct (other than general advice) if the distributor is a representative of the issuer that is trained as a "business relationship manager". This condition is appropriate as it requires a distributor to be appropriately trained to engage in all retail product distribution conduct (other than general advice).
		<b>Condition 5</b> A distributor must only engage in retail product distribution conduct (other than general advice) if it has received a Trust Deed for the SMSF and verified that the consumer is the corporate trustee of the fund. This condition is appropriate as it requires a distributor to confirm that the consumer is in the target market.

<b>Review Triggers</b> The events and circumstances that would reasonably suggest the determination is no longer appropriate	The issuer, and any distributor of this product, must cease retail product distribution conduct in respect of this product when the issuer determines a material event or circumstance has occurred in relation to:	
	<b>Material Complaints</b>	Material complaints (in number or significance) in relation to the terms of this product and / or the distribution conduct.
	<b>Financial Difficulty</b>	A significant number of customers experiencing financial difficulty (as evidenced by, for example, default notices, hardship requests refinance request information) related directly to the appropriateness of the product that the issuer determines may relate to the appropriateness of the determination.
	<b>Product Performance</b>	Evidence, as determined by the issuer, of the performance of the product, in practice, that may suggest that the product is not appropriate for the target market.
	<b>Distributor Feedback</b>	Reporting from distributors (including the issuer's representatives and third parties), or consistent feedback from distributors on the target market which suggests that the determination may no longer be appropriate.
	<b>Substantial Product Change</b>	A substantial change to the product that is likely to result in the determination no longer being appropriate for the target market.
	<b>Significant Dealing</b>	A material pattern of dealings in the product or of distributor conduct that is not consistent with the determination.
	<b>Notification from ASIC</b>	A notification from ASIC requiring immediate cessation of product distribution or particular conduct in relation to the product.
	<b>Reporting Period</b> The reporting period for this determination is every 3 months commencing from the Start Date.	
<b>Reporting Information</b> The kinds of information needed to identify whether a review trigger has occurred, who must report this information and the reporting period	A person that engages in retail product distribution conduct in respect of this product ( <b>distributor</b> ) must provide the following information in writing to the issuer within the times specified below:	
	<b>Complaint Information</b>	Information about complaints received in relation to the product during the reporting period, and if complaints were received, a description of the number of complaints and the nature of the complaints received and other complaint information set out in paragraph RG 271.182 of Regulatory Guide 271 Internal dispute resolution.  The distributor must provide the information as soon as practicable, or in any event, within 10 business days after the end of each reporting period.
	<b>Financial Difficulty</b>	Information about customers experiencing financial difficulty related directly to the appropriateness of the product of which the distributor becomes aware.  The distributor must provide the information as soon as practicable, or in any event, within 10 business days after the end of each reporting period.
	<b>Distributor Feedback</b>	Information discovered or held by the distributor that suggests that the determination may no longer be appropriate.  The distributor must provide the information as soon as practicable, or in any event, within 10 business days after the end of each reporting period.
	<b>Significant Dealing</b>	Information about any significant dealing in the product that is not consistent with the target market determination of which the distributor becomes aware.  The distributor must provide the information as soon as practicable, or in any event, within 10 business days after becoming aware of the significant dealing.

	<b>Information Requested by Issuer</b>	Information reasonably requested by the issuer. The distributor must provide the information by the date requested by the issuer.
--	--	---