

TARGET MARKET DETERMINATION (TMD)

INTRODUCTION

This TMD has been prepared by Australian Synergy Finance Pty Ltd (trading as My Cashonline), ABN 54 613 655 646 (**Company**), Australian Credit Licence number 490 422 . This TMD applies to small amount credit contracts (SACCs) and other credit (which includes medium amount credit contracts (MACCs), as those terms are defined National Consumer Protection Act 2009 (National Credit Act) (the **Credit Products**).

The date from which this TARGET MARKET DETERMINATION is effective is 01/08/2024

What is a Target Market Determination?

This TMD is issued in accordance the Corporations Act 2001 (Cth), Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019 (Cth).

This TMD is designed to set out the **Target Class** (defined below) for which the Credit Products are likely to be consistent with their likely objectives, financial situation and needs. This TMD is general in nature and should not be construed as credit or financial advice. This TMD is not intended to replace other documents related to the Credit Products provided by the Company which set out the terms and conditions relating to the Credit Products.

This TMD describes:

- the attributes of the Credit Products.
- the Target Class for each Credit Product.
- the Credit Products distribution conditions
- review triggers, and how the Company identifies and addresses ‘significant dealings’.

	Small Amount Credit Contract	Other credit including MACCs
Likely objectives	<p>This Credit Product is likely to be suitable for consumers with the following <i>likely objectives</i>:</p> <ul style="list-style-type: none"> • seeking loan amounts not exceeding \$2,000 • seeking repayment certainty from fixed repayments and fixed fee structure seeking an online financing solution • not requiring an in person lending solution • Seeking access to smaller loan amounts on a short-term basis to meet 	<p>This Credit Product is likely to be suitable for consumers with the following <i>likely objectives</i>:</p> <ul style="list-style-type: none"> • Seeking either a secured or unsecured credit product for amounts between \$2,001 to \$11,000 for personal purposes, other than emergencies • seeking repayment certainty from fixed repayments and a fixed interest rate. • seeking an online financing solution; • not requiring an in person lending

	emergencies or other unexpected liabilities.	solution
Likely financial situation and needs	<p>This Credit Product is likely to be suitable for consumers with the <i>following likely financial situation and needs</i>:</p> <ul style="list-style-type: none"> existing customers with a successful repayment history or new customers with strong income and repayment capacities have a regular, verifiable income and can afford the repayments for the loan without hardship. have some developed levels of financial literacy; are not bankrupt or subject to a repayment program with a creditor due to a default 	<p>This Credit Product is likely to be suitable for consumers with the <i>following likely financial situation and needs</i> who:</p> <ul style="list-style-type: none"> have a regular, verifiable income and can afford the repayments for the loan without hardship. are not currently bankrupt or in a Part IX debt agreement in the last 12 months may not satisfy the lending history requirements of mainstream lenders; have some developed levels of financial literacy; are not subject to a repayment program with a creditor due to a default
Key Product Attributes	<p>This Credit Product has the following <i>key attributes</i>:</p> <ul style="list-style-type: none"> loan amounts between \$200 and \$2,000 20% establishments fees and fixed monthly fee of 4% (based on principal amount) Flexible repayment options: Weekly, fortnightly, monthly or depending on the consumer's choice and their income cycle The Credit Product may be unsecured or secured by a registered vehicle Unsecured credit product 	<ul style="list-style-type: none"> This Credit Product has the following key attributes: loan amounts between \$2,001 and \$11,000 Establishments fees between \$400 (If the amount is under \$5,000) and \$0 if the amount is from \$5,001 to \$11,000 Fixed interest rates depending on consumer risk profile Flexible repayment options: Weekly, fortnightly, monthly or depending on the consumer's choice and their income cycle Default fee \$27, Reschedule fee \$15. The Credit Product may be unsecured or secured by a registered vehicle.
Ineligible/excluded class of consumers	<p>The Credit Product is <i>not suitable</i> for consumers</p> <ul style="list-style-type: none"> Seeking to borrow more than \$2,000 seeking variable repayments and variable interest rates credit products seeking a redraw facility or revolving credit customers who receive government benefits who are unlikely to be able to meet their payment obligations under the 	<p>The Credit Product is <i>not suitable</i> for consumers</p> <ul style="list-style-type: none"> seeking variable repayments and variable interest rates credit products However, early repayment is available for consumers subject to an early repayment fee seeking a redraw facility or revolving credit who are unlikely to be able to meet

	<p>loan either at all, or only with substantial hardship.</p> <ul style="list-style-type: none"> • under 18 years of age. • are not Australian citizens, permanent residents or valid visa holders. • who have low credit score (Credit score under 100) • who are in default with another creditor • who are in hardship • with only cash income or other income that cannot be verified • who want to deal with a lender in person or via a branch • who are currently bankrupt or in a Part IX debt agreement in the last 12 months 	<p>their payment obligations under the loan either at all, or only with substantial hardship.</p> <ul style="list-style-type: none"> • who are unemployed or receive more than 50% of their income from Government benefits • seeking a longer-term loan that can be repaid over more than 76 weeks. • under 18 years of age. • are not Australian citizens, permanent residents or valid visa holders. • who have low credit score (Credit score under 100) • who are in default with another creditor • who are in hardship • with only cash income or other income that cannot be verified • who want to deal with a lender in person or via a branch
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Distribution

As an online lender, the Company distributes its Credit Products through both direct (e.g. google and the Company's website) and indirect channels (e.g. referral sites).

The Company's website contains information to assist about the Company and the Credit Products, including:

- Product and pricing related information
- Tools and information relating to a person's likely eligibility for the Credit Product
- all relevant disclosures and warnings as required by law

Review triggers

A review of this TMD will be triggered if the Company:

- receives, in respect of a calendar quarter, 10% increase in complaints or hardship cases in relation to a Credit Product (as compared to the previous quarter)
- the number of defaults as a percentage of the line of a Credit Product increases by 10% in a 3-month period
- is notified by ASIC of serious concerns about the design or distribution of a Credit Product
- An external event that would create a material change to the design or distribution of a Credit

Product, such as any changes to the legislation;

- where there is a Significant Dealing (defined below)
- A Credit Product needs a re-design.

Significant Dealings

If at any time, we detect that more than 10% of the consumers within a 6-month period, who have obtained a Credit Product are not within that Credit Product's Target Class, the Company shall:

- report this to ASIC as a significant dealing within ten (10) business days.
- treat this as a Trigger Event and conduct an immediate review of the Credit Product, this TMD and distribution channels.

Distributors

To ensure that the Company meets the reporting obligations set out under the ASIC Regulatory Guide 274, the Company's distributors of the Credit Products are required to:

- Provide number of requests for hardship applications they received ;
- provide the number of complaints they receive and the substance of those complaints;
- provide rates of arrears and defaults
- provide rates of early payout
- report Significant Dealings
- provide any other relevant information which the Company determines is relevant and necessary;
- provide general feedback as to whether the Product continues to be suitable for the Target Class

The above information is required to be reported to the Company in accordance with the following reporting periods:

- 6 months for the purposes of the TMD for non-complaint related reporting; and
- 2 Business Days in respect of a complaint
- 10 Business Days of becoming aware of a Significant Dealing

REVIEW Period

The Company will review this TMD periodically to ensure that it remains appropriate.

An ongoing review of this TMD will be conducted 1 August of each year.