

Target Market Determinations – Brighten Easy Builder Full Doc and Brighten Easy Builder Alt Doc

Legal Disclaimer:

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). It sets out the class of consumers for whom the product, including its key attributes, would likely be consistent with their likely objectives, financial situation and needs. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of Brighten Home Loans Pty Ltd ACN 620 839 983 (**Brighten**) design and distribution arrangements for the product.

This document is not a summary of the product features or terms of the product. This document does not take into account any person's individual objectives, financial situation or needs.

Product	Brighten Easy Builder Full Doc and Brighten Easy Builder Alt Doc
Issuer	Brighten Home Loans Pty Ltd ACN 620 839 983
Date of TMD	11 October 2021
Target Market	<p><i>Description of target market</i></p> <p>The above product is for all construction loans requiring progress payments (e.g. this loan is suitable for an applicant who has bought a “house and land package”). An interest only option is available during the construction period. Upon completion, the loan reverts to a Brighten Boss Prime at a variable rate, with interest only or principal and interest repayment options available. The target market of the product includes Individuals, Companies and Trusts.</p> <p>The criteria for acceptable Individual Applicants for the product is:</p> <ul style="list-style-type: none">• Australian or New Zealand resident; and• Minimum age of borrower is 18. <p>The criteria for acceptable Company Applicants for the product is:</p> <ul style="list-style-type: none">• The company must have a valid ACN;• The details of all shareholders with more than 25% shareholding in the company (if not a director) must be collected;• Maximum of 4 guarantors is acceptable;• Guarantors must be natural persons; and• Living expenses of the guarantors must be included. <p>The criteria for acceptable Trust Applicants for the product is:</p> <ul style="list-style-type: none">• Loans to a trust must be in the name of the trustee in its/their own right and also in its/their capacity as trustee;• Discretionary, Unit or Family trusts permitted; and• Full trust deed to be provided (stamped & signed). <p><i>Description of product, including key attributes</i></p> <p>The main difference between the two products is that Brighten Easy Builder Full Doc is for Full Doc application, whereas Brighten Easy Builder Alt Doc is for Alt Doc application.</p> <p>Information about the product's specifications is set out below:</p> <ul style="list-style-type: none">• The purpose of the loans is house and land construction loans with progress payments;

- The repayment options include interest only during construction, and principal and interest or interest only after construction;
- The interest only periods are a maximum of 5 years;
- The repayment methods include Direct Debit, BPAY and Pay anyone;
- The loan term 15-30 years;
- There is a 100% Offset Facility included for variable rate loans post construction;
- The repayment options include principal and interest or interest only (maximum 5 years)
- The minimum loan size is \$200,000;
- The maximum loan size is \$1,500,000; and
- The maximum LVR is 80%.

Description of likely objectives, financial situation and needs of consumers in the target market

This product is designed for consumers who are:

- Seeking construction loans with progress payments (excluding owner builders);
- If the customer chose a variable rate they would be seeking flexibility to make extra repayments without a fee; seeking flexibility to redraw funds as required; seeking additional features on their home loan (ie. offset account); and
- The customer would need to meet Brighten's credit assessment and AML/CTF requirements.

Classes of consumers for whom the product is clearly unsuitable

Applicants will not be considered from the following:

- Minors;
- Companies or company trustee's involving disqualified directors;
- Companies and/or individuals where a significant portion of their income is derived from the purchase / development / re-sale of property, unless to purchase or refinance their owner-occupied residence (cash out limited to \$10,000);
- Bankrupts discharged < 3 years ago;
- Applicants under external administration;
- Superannuation funds (either applicant or security provider);
- Superannuation funds (either applicant or security provider);
- Public companies;
- Owner Builders;
- Limited Liability Companies;
- Associations;
- Churches;
- Clubs; and
- Borrowers of Convenience.

Explanation of why the product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market

This product is likely to be consistent with the likely objectives, financial situations and needs of the customers within the target market as it is a simple loan construct to understand with variable interest rates only. Repayments may be principal and interest or interest only up to 5 years. To be eligible to purchase this product, requirements must be met in relation to:

- Employment; and
- Income,

which would mean that, without exceptional circumstances, the Borrowers will be able to meet their repayment obligations.

<p>Distribution Conditions</p>	<p><i>Distribution conditions</i></p> <p>The main distribution channel for this product is through third party distributors, being mortgage brokers, mortgage managers, and aggregator panels (Distribution Partners).</p> <p>The distribution conditions which Distribution Partners must comply with include ensuring that potential customers within the target market meet the eligibility requirements for the product.</p> <p>In order to distribute this product to a potential customer within the target market, the customer must not:</p> <ol style="list-style-type: none"> 1. fall into a class of customers set out under the above heading, “<i>Classes of consumers for whom the product is clearly unsuitable</i>”; or 2. provide an unacceptable security type. <p>Further eligibility requirements to purchase this product include:</p> <ol style="list-style-type: none"> 1. Employment requirements of the target market; and 2. Income requirements of the target market. <p><i>Why the distribution conditions and restrictions will make it more likely that the consumers who acquire the product are in the target market</i></p> <p>Brighten monitors the quality and content of applications received from its Distribution Partners for trends and patterns of unacceptable practices or just poor quality and/or incomplete loan applications. Feedback is given, if and when needed. Brightens distributing Mortgage Brokers and Mortgage Managers are all party to agreements that contain commission or fee claw back clauses for unacceptable loans, poor performing loans, fraud and AML/CTF issues amongst other criteria. Brighten also reserves the right in these agreements to terminate Brokers for any reason on two weeks’ notice.</p>
<p>Review Triggers</p>	<p>The review triggers that would reasonably suggest that the TMD is no longer appropriate include:</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 or dissatisfaction by the customers in relation to Distribution Partners; • A significant number of complaints is received from customers in relation to their purchase or use of the product that reasonably suggests that the TMD is no longer appropriate; • A material change to the product or the terms and conditions of the product occurs which would cause the TMD to no longer be appropriate; • Hindsight reviews indicate that the product has been sold to classes of customers for whom the product is clearly unsuitable; • Material changes to the regulatory environment or relevant legislation; • The extent and nature of any negative feedback from Distribution Partners indicating that they are unable to sell the product to eligible customers within the target market; • The extent and nature of any negative feedback from Borrowers indicating that they are dissatisfied with the product; • High rates of default by the customers in the target market; and • Customers of the target market seeking to switch to other loan products.
<p>Review Periods</p>	<p><i>First review date:</i> 5 April 2022</p> <p><i>Periodic reviews:</i> Every 12 months, and in the event it comes to our knowledge that a review trigger is triggered or that the product is not meeting the target market.</p>
<p>Distribution Information Reporting Requirements</p>	<p>The following information must be provided to Brighten by distributors who engage in retail product distribution conduct in relation to this product:</p>

	<u>Type of information</u>	<u>Description</u>	<u>Reporting period</u>
	Customer Complaints	Number of complaints received in relation to the product	Every 6 months
	Broker Complaints	The extent and the nature of the complaints received from brokers about difficulty in selling to the targets market	Every 6 months
	Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (i.e. why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
	Application details	The broker is responsible to sight the original documents and make reasonable enquiries as to their authenticity to ensure that eligible customers are purchasing the product.	As soon as practicable
	Dealings outside of the target market	To the extent a broker is aware of dealings outside of the target market, these should be reported to Brighten, including the reason why acquisition is outside of target market	Within 10 business days
	Customer payment default	Customers within the target market are unable to meet their loan repayments	As soon as practicable
	Customer's dissatisfaction with the product	The customer inquiring to change the product or making complaints about it	Every 6 months