Target Market Determinations – Brighten Easy Builder®

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 customers for whom the product, including its key attributes, would likely be appropriate and 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 Product Disclosure Statement (**PDS**) and is not a summary of the product features or terms of the product. The information contained in this TMD does not take into account any person's individual objectives, financial situation or needs.

Product	Brighten Easy Builder®
Issuer	Brighten Home Loans Pty Ltd ACN 620 839 983
Date of TMD	Created on 22 December 2023 Last Reviewed on 7 September 2026 Version 20260904
Target Market	***Description of target market*** The above product is a full documentation (**Full Doc**) or alternative documentation (**Alt Doc**) loan secured by residential property by first mortgage. The 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"). The target market for the products includes Australian citizens, permanent residents, temporary residents or residents of approved overseas countries, and who are: • Over the age of 18; and • Employed (PAYG); or • Investors; or • Self-employed. All applicants who do not reside in Australia must provide evidence of approval from FIRB or establish that their acquisition is exempt from approval. Residents from the following list of countries can be considered for this product: Australia, Bahrain, Brazil, Canada, China, France, Germany, Hong Kong SAR, Indonesia, Malaysia, Japan, Macau SAR, Qatar, New Zealand, Saudi Arabia, Singapore, South Africa, South Korea, Switzerland, Taiwan, United Arab Emirates, United Kingdom, USA, Vietnam. ***class of consumers for whom this product, including its key attributes, is likely to be consistent with their likely objectives, financial situation and needs:*** The product is a Full Doc or Alt Doc construction loan secured by first registered mortgage over residential property (including vacant land supported by a signed fixed-cost building contract) in a Category 1 or Category 2 postcode, and Category 1 postcodes only for non-resident applicants, advanced by progress payments and designed for consumers building a new dwelling (including "house-and-land" packages).

	It is designed for consumers aged 18 or over who are Australian citizens, permanent residents, temporary residents, or residents of an approved overseas country, and who are salaried (PAYG) employees or self-employed persons, including Australian expatriates and temporary residents with income in AUD or an acceptable foreign currency and non-residents from a country on Brighten's Acceptable Country List, and who: • are financing construction of a new residential dwelling (a maximum of two residential dwellings on one title) under a full and complete fixed-price building contract dated within 12 months, and not renovations, owner-builder work, non-arm's length, split or cost-plus contracts, or any dwelling with a development component; • require staged/progress-payment drawdowns during the construction period; • seek a loan of \$200,000–\$15,000,000 at an LVR of up to 80% of the "as if complete" value (up to 70% for non-resident applicants); • want interest-only repayments during construction, reverting on completion to principal-and-interest or to interest-only for up to 5 years followed by principal-and-interest, on a variable rate, over a term of up to 30 years (up to 29 years and 11 months for non-resident applicants). Non-resident applicants must provide FIRB approval or an exemption. Approved overseas-resident countries are as listed in Brighten's policy; others are case-by-case with credit and compliance approval. All customers must satisfy Brighten's credit assessment, serviceability and the security offered must meet Brighten's acceptable security and location (postcode category) criteria. ***Description of product, including key attributes*** Information about the product's specifications is set out below: • Interest only repayments during construction, and either principal and interest repayments or interest only repayments after construction completion; • Interest only periods of a maximum of 5 years; • Variable rate product only; • Loan term of 15-30 years; • 100% Offset Facility available post construction; and • After the construction completion, loan will convert to one of our standard residential home loan products including Brighten Empower Prime, Brighten Boss Prime and Brighten Elevate. ***Description of likely objectives, financial situation and needs of customers in the target market*** This product is designed for customers who are: • Seeking construction loans with progress payments (excluding owner builders); • Seeking flexibility to make extra repayments without a fee; and • Seeking to make interest only repayment for up to 5 years. All customers must satisfy Brighten's credit assessment and AML/CTF requirements. ***Classes of customer for whom the product is clearly unsuitable*** We will not accept applications from Politically Exposed Persons without approval from compliance, or from applicants located in countries identified by FATF as having AML/CTF deficiencies. 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 < 2 years ago; • Applicants under external administration; • 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 customers 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: • Variable interest rates only: • Repayments may be principal and interest or interest only up to 5 years. To be eligible to qualify for this product, requirements must be met in relation to: • Employment; • Income; and Credit criteria being met following loan assessment,which would mean that, without exceptional circumstances, the Borrowers will be able to meet their repayment obligations. Customers will need to also provide sufficient security in accordance with Brighten's credit assessment criteria, including: • Acceptable property mortgage; • General or specific security agreements; and/or • Guarantor who supports the loan by providing additional security. The financial situation of the Target Market are customers that meet Brighten's credit assessment criteria which includes: • Demonstrating the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and • Where determined by Brighten to be required, (based on the customer's security, applicant and loan attributes), have an acceptable guarantor. Brighten considers its processes in place, including assessing the customer's ability to service the loan account, will mean that the product will likely be consistent with the financial situation of the Target Market.
Distribution Conditions	***Distribution Channels*** The Distribution Partners are appropriately licensed as an Australian Credit Licensee, employee of an Australian Credit Licensee, or Credit Representative, and under this licence are required to maintain appropriate professional development training, to distribute the product to customers who are in the target market.

	The distribution channels and conditions are appropriate because: • Distribution Partners must comply with licensing and legislative requirements to ensure the product provided is in the best interests of each customer. • Brighten monitors application quality received from Distribution Partners, tracking trends that indicate poor practices, incomplete applications, or inadequate assessments. • Internal Distribution Partners have KPIs, monitoring and performance metrics in place and there is oversight regarding poor performing loans, fraud, AML/CTF breaches, and other unacceptable practices. • All external Distribution Partners have an agreement which includes commission or fee clawback clauses for poor performing loans, fraud, AML/CTF breaches, and other unacceptable practices. • We will not accept applications from customers who fall materially outside of the target market for this product. • Brighten also reserves the right in these agreements to terminate Brokers for any reason In order to distribute this product to a potential customer within the target market, the customer must not: 1. Fall into a class of customers set out under the above heading, "*Classes of customers for whom the product is clearly unsuitable*"; or 2. Provide an unacceptable security type. Further eligibility requirements to qualify for this product include: 1. Employment requirements of the target market; and 2. Income requirements of the target market.
Review Triggers	The review triggers that would reasonably suggest that the TMD is no longer appropriate include the following events and circumstances: • A material change to the product or the terms and conditions of the product. • A significant dealing of the product, as decided by us, to customers outside the target market occurs. • Changes to the regulatory environment or relevant legislation which materially impacts upon the design and distribution of the product. • A material increase in customer complaints about the product or Distribution Partner conduct. • A material increase to default or hardship rates for the product. • A material or unexpected decline in applications from the target market. • A material or unexpected increase of customers seeking to switch to other products. • A notification from a regulator in relation to the distribution of the product. • Any other event or circumstance which reasonably suggests that the TMD is no longer appropriate.
Review Periods	***Periodic reviews***: Every 24 months or within 10 business days of a Review Trigger being identified

Distribution Information Reporting Requirements	Distribution Partners must provide the following information to Brighten:

Type of Information	**Description**	**Reporting period**
Customer Complaints	If received, number of complaints received in relation to the product, the nature of the complaint, circumstances giving rise to the complaint and the complaint outcome.	Every 6 months
Distribution Partner Complaints	If received, the extent and the nature of the complaints received about a Distribution Partner or from a Distribution Partner, whether external or internal, in relation to the product, the nature of the complaint, circumstances giving rise to the complaint and the complaint outcome and/or 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 event within 10 business days after becoming aware.
Dealings outside of the target market	Date or date range of the dealing(s) outside of the target market (to the extent they are aware of such dealings) and the reason why distribution occurred.	Every 6 months