Target Market Determinations – Brighten SMSF Residential Loan

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 SMSF Residential Loan
Issuer	Brighten Home Loans Pty Ltd ACN 620 839 983
Date of TMD	Created on 22 October 2025 Last Reviewed on 7 September 2026 Version 20260904
Target Market	***Description of target market*** This product is suitable for trustees who operate a compliant self-managed superannuation fund in accordance with the *Superannuation Industry (Supervision) Act 1993 (Cth)* and want a loan to purchase, or refinance, a residential investment property. The product is suitable for customers who: • are corporate or individual trustees of a self-managed superannuation fund (SMSF) • are 18 years of age or over • includes at least one member who is in accumulation phase • are Australian or New Zealand citizens or permanent residents • have appointed a non-trading corporate trustee to act as the legal owner and security trustee of the proposed property • require finance for the acquisition, or refinance, of a residential investment property All customers must satisfy Brighten's credit assessment and AML/CTF requirements. ***Classes of customers for whom the product is clearly unsuitable*** This product is unlikely to meet the needs, objectives and financial situation of customers who: • are not a self-managed superannuation fund (SMSF) • require a loan for a property for personal use • require a construction loan • require a fixed rate loan • require a loan term of greater than 30 years • require a loan amount of less than $50,000 or greater than $3 million • require redraw or loan offset facilities • cannot demonstrate they can make regular repayments over a sustained period

	• do not meet Brighten's credit or eligibility criteria We will not accept applications from Politically Exposed Persons without approval from compliance, or from applications located in countries identified by FATF as having AML/CTF deficiencies. ***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 limited recourse borrowing arrangement (LRBA) loan secured by first registered mortgage over a single residential investment property, for the trustee of a compliant self-managed superannuation fund (SMSF) under the Superannuation Industry (Supervision) Act 1993 (Cth). The target market is corporate trustees, or a minimum of two individual trustees, of a compliant SMSF with up to six members (with a non-trading corporate property/bare trustee holding the asset) where: • members/trustees are aged 18 or over and are Australian or New Zealand citizens or permanent residents; • at least one member is in accumulation phase; • the fund seeks to acquire a residential investment property, or refinance an existing residential SMSF loan, as an arm's length investment; • the loan is $50,000–$3,000,000 at an LVR of up to 80%; and • repayments are on a principal-and-interest basis, or interest only for up to 5 years followed by principal and interest, over a term of up to 30 years. The product suits SMSF trustees who have obtained independent legal and financial advice, whose fund can service the loan from rental income and contributions, and who understand the limited recourse nature of the facility. It is available on a full documentation or alternative documentation basis, so it is suitable for funds whose members are PAYG employees or self-employed. All SMSFs must be compliant (verified via Super Fund Lookup) prior to settlement. All customers must satisfy Brighten's credit assessment, serviceability and AML/CTF requirements, and the security offered must be residential property in a Category 1 or Category 2 postcode on Brighten's Acceptable Security Location Postcodes List. The product does not offer offset or redraw facilities. Meeting these requirements would mean that, without exceptional circumstances, the Borrowers will be able to meet their repayment obligations. ***Product Description, including key attributes*** This product has the following key features: • variable interest rate loan where the rate can change at any time during the term • minimum loan amount of $50,000 and a maximum of $3 million • maximum loan term of 30 years • maximum loan to value ratio (LVR) of 80% • Principal and Interest repayment, or Interest Only repayment up to a maximum of 5 years, subject to a lending assessment • repayment frequency for Principal and Interest repayments include weekly, fortnightly or monthly • repayment frequency for Interest Only repayments is monthly • additional or lump sum repayments are permitted • fees and charges payable may include valuation fees, settlement fees, legal fees, discharge fees, early termination fee (if applicable), other fees and charges as set out in the loan contract

Distribution Conditions and Restrictions	***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 Periods	***Periodic reviews***: Every 24 months or within 10 business days of a Review Trigger being identified.
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. .

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 target 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