

## Target Market Determination for Vibe SMSF -Variable Investment Product

This Target Market Determination (**TMD**) which is required by law is to make sure that our customers objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances where we will review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

***IMPORTANT:** This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant terms and conditions and credit guide and seek independent financial or legal advice before making any decision.*

Product	Vibe SMSF – Variable Investment Product
Product Manager	Columbus Capital Pty Ltd ACN 119 531 252, Australian Financial Services Licence and Australian Credit Licence 337303
Issuer	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below:</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited (ACN 000 341 533), Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242;</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794;</li> </ul> <p>to be referred to as <b>(Columbus/we/us)</b>.</p>
Effective Date of TMD	20 February 2024.
TMD Version	2024.1
Next review due:	At least every 12 months from the Effective Date of this Target Market Determination

\*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at [www.originmms.com.au](http://www.originmms.com.au).

## Target Market Determination for Vibe SMSF -Variable Investment Product

### Target Market

We have undertaken an assessment of the product and are of the view that the Product Attributes are likely to be consistent with the Objectives and Needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for target Market
<ul style="list-style-type: none"> <li>▪ Seeking a property loan with a range of features including repayments that can vary over the life of the loan for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, a residential, investment, NDIS or commercial investment property;</li> <li>○ purchase of an investment house and land package and/or;</li> <li>○ off the plan purchase as investors.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The property loan account has a variable interest rate, meaning that repayments will vary based on changes to the interest rate.</li> <li>▪ The loan amount can be used for any one or more of the listed purposes.</li> <li>▪ <b>SMSF Investment &amp; Commercial Investment</b> loans offer:               <ul style="list-style-type: none"> <li>○ Principal and Interest; or</li> <li>○ Interest Only, is available for an agreed period.</li> </ul> </li> <li>▪ <b>SMSF NDIS Investment</b> loans offer:               <ul style="list-style-type: none"> <li>○ Principal and Interest.</li> </ul> </li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Flexibility to make additional payments more than the required monthly repayment amount and switch between principal &amp; interest and interest only repayments</li> </ul>	<ul style="list-style-type: none"> <li>▪ Unlimited additional repayments (including the ability to pay the loan out early) can be made without additional charge.</li> <li>▪ A customer can switch between principal &amp; interest and interest only repayment (terms and conditions apply).</li> </ul>
<ul style="list-style-type: none"> <li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li> </ul>	<ul style="list-style-type: none"> <li>▪ Credit balances in the Offset Account will reduce the balance on which interest is charged.</li> <li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:               <ul style="list-style-type: none"> <li>○ Online and Mobile Application access;</li> <li>○ Direct debit &amp; BPAY repayment facility; and</li> <li>○ Staff assisted channels.</li> </ul> </li> </ul>

## Target Market Determination for Vibe SMSF -Variable Investment Product

### Eligibility Criteria for the Product

To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:

- have a registered and compliant Australian Self-Managed Superannuation Fund (SMSF) and are:
  - the members and directors of the SMSF are an Australian Citizen or a Permanent Resident of Australia;
  - a SMSF has a Corporate Trustee;
  - must hold a beneficial interest in the security property;
  - must meet all relevant legislative & associated regulation requirements to acquire the property & borrow from the Property Trustee in accordance with the Superannuation Industry (Supervision) Act 1993; and
  - must hold the legal interest in the security property on trust for the SMSF;
- meet our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- guarantor who supports the loan also meets our lending eligibility criteria.

### Financial Situation

The financial situation of the Target Market are consumers that:

- meet our lending eligibility and credit assessment criteria which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers' deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer's ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.

### Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market product and in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"><li>▪ Staff assisted channels (e.g., via email or phone)</li></ul>	<ul style="list-style-type: none"><li>▪ Our staff have the necessary training, knowledge, and accreditation (if required):<ul style="list-style-type: none"><li>○ to understand and can discuss the features and rates of our products;</li><li>○ to understand and can discuss the key differences of our products;</li></ul></li></ul>

## Target Market Determination for Vibe SMSF -Variable Investment Product

	<ul style="list-style-type: none"> <li>○ to assess whether the consumer is within the target market;</li> <li>○ to assess whether the consumer meets our lending eligibility lending criteria; and</li> <li>○ have access to product resources such as borrowing and repayment calculators, stamp duty &amp; upfront cost calculator, pricing tools etc.</li> </ul> <ul style="list-style-type: none"> <li>▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place.</li> <li>▪ We have approval control systems and processes in place that checks and flags applicants who may be outside the Target Market.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Online channels (e.g., website and the mobile app)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The product cannot be distributed through online channels however the application process may commence online.</li> <li>▪ Applications commenced through an online channel will be directed through to a staff assisted channel.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (<b>BID</b>) obligations</li> </ul>	<ul style="list-style-type: none"> <li>▪ A distributor must:               <ul style="list-style-type: none"> <li>○ hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;</li> <li>○ comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and</li> <li>○ comply with their legal obligations.</li> </ul> </li> <li>▪ Third party brokers must also:               <ul style="list-style-type: none"> <li>○ hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and</li> <li>○ comply with their obligation to act in the best interests of their client when providing credit assistance.</li> </ul> </li> <li>▪ These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.</li> </ul>

## Target Market Determination for Vibe SMSF -Variable Investment Product

### Review Triggers

Columbus has outlined below its review triggers of this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers of this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance;</li> <li>▪ Unexpected early-stage arrears are detected;</li> <li>▪ A significant number of defaults occur;</li> <li>▪ A significant number of late repayments are being recorded;</li> <li>▪ Evidence that the product or distributor conduct are significantly different to the target market.</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>▪ A significant number of material complaints are received from consumers in relation to the product.</li> </ul>
Incident Data	<ul style="list-style-type: none"> <li>▪ A material incident or significant number of incidents in relation to the product's design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
Changes to the Product	<ul style="list-style-type: none"> <li>▪ The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>
Significant Dealings	<ul style="list-style-type: none"> <li>▪ A significant dealing of the product to consumers outside the target market occurs.</li> </ul>
Notification from ASIC	<ul style="list-style-type: none"> <li>▪ The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul>

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

## Target Market Determination for Vibe SMSF -Variable Investment Product

### Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
<b>Complaints</b>	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
<b>Feedback</b>	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
<b>Information requested</b>	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.

## Target Market Determination for Vibe SMSF -Fixed Investment Product

This Target Market Determination (**TMD**) which is required by law is to make sure that our customers objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances where we will review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

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Product	Vibe SMSF – Fixed Investment Product
Product Manager	Columbus Capital Pty Ltd ACN 119 531 252, Australian Credit Licence 337303
Issuer	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below:</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited (ACN 000 341 533), Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242;</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794;</li> </ul> <p>to be referred to as (<b>Columbus/we/us</b>).</p>
Effective Date of TMD	20 February 2024.
TMD Version	2024.1
Next review due:	At least every 12 months from the Effective Date of this Target Market Determination

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## Target Market Determination for Vibe SMSF -Fixed Investment Product

### Target Market

We have undertaken an assessment of the product and are of the view that the Product Attributes are likely to be consistent with the Objectives and Needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for target Market
<ul style="list-style-type: none"> <li>▪ Seeking an investment loan with the certainty of fixed repayments over a set period for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, a residential, investment, NDIS or commercial investment property;</li> <li>○ purchase of investment house and land package and/or;</li> <li>○ off the plan purchase as investors.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The investment account will receive a fixed interest rate between 1 and 5 years, meaning repayments will be fixed for the selected term.</li> <li>▪ The Fixed Rate property loan will change to a Standard Variable Rate property loan, after the set fixed interest rate period expires. The interest rate and repayments will become variable, unless it is switched to another loan type including a new Fixed Rate property loan.</li> <li>▪ Additional charges including an early repayment adjustment (i.e. Break costs) may apply if a customer wishes to break their fixed term early or pay the loan out early.</li> <li>▪ The loan amount can be used for any one or more of the listed purposes.</li> <li>▪ <b>SMSF Investment &amp; Commercial Investment</b> loans offer:               <ul style="list-style-type: none"> <li>○ Principal and Interest; or</li> <li>○ Interest Only, is available for an agreed period.</li> </ul> </li> <li>▪ <b>SMSF NDIS Investment</b> loans offer:               <ul style="list-style-type: none"> <li>○ Principal and Interest.</li> </ul> </li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Flexibility to make additional payments more than the required monthly repayment amount of up to \$20,000 per annum and switch between principal &amp; interest and interest only repayments</li> </ul>	<ul style="list-style-type: none"> <li>▪ Extra repayments of up to \$20,000 per annum, can be made without additional charges.</li> <li>▪ A customer can switch between principal and interest and interest only repayment (terms and conditions apply).</li> </ul>
<ul style="list-style-type: none"> <li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li> </ul>	<ul style="list-style-type: none"> <li>▪ Credit balances in the Offset Account will reduce the balance of up to \$20,000 per annum on which interest is charged.</li> <li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:               <ul style="list-style-type: none"> <li>○ Online and Mobile Application access;</li> <li>○ Direct Debit and BPAY repayment facility; and</li> <li>○ Staff assisted channels.</li> </ul> </li> </ul>



## Target Market Determination for Vibe SMSF -Fixed Investment Product

### Eligibility Criteria for the Product

To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:

- have a registered and compliant Australian Self-Managed Superannuation Fund (SMSF) and are:
  - the members and directors of the SMSF are an Australian Citizen or a Permanent Resident of Australia;
  - the SMSF has a Corporate Trustee;
  - must hold a beneficial interest in the security property;
  - must meet all relevant legislative & associated regulation requirements to acquire the property & borrow from the Property Trustee in accordance with the Superannuation Industry (Supervision) Act 1993; and
  - must hold the legal interest in the security property on trust for the SMSF;
- meet our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- guarantor who supports the loan also meets our lending eligibility criteria.

### Financial Situation

The financial situation of the Target Market are consumers that:

- meet our lending eligibility and credit assessment criteria which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers' deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer's ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.

### Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market product and in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"><li>▪ Staff assisted channels (e.g., via email or phone)</li></ul>	<ul style="list-style-type: none"><li>▪ Our staff have the necessary training, knowledge, and accreditation (if required):<ul style="list-style-type: none"><li>○ to understand and can discuss the features and rates of our products;</li><li>○ to understand and can discuss the key differences of our products;</li></ul></li></ul>

## Target Market Determination for Vibe SMSF -Fixed Investment Product

<ul style="list-style-type: none"> <li>▪ Staff assisted channels (e.g., via email or phone)</li> </ul>	<ul style="list-style-type: none"> <li>○ to assess whether the consumer is within the target market;</li> <li>○ to assess whether the consumer meets our lending eligibility criteria; and</li> <li>○ have access to product resources such as borrowing and repayment calculators, stamp duty &amp; upfront cost calculator, pricing tools etc.</li> <li>▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place.</li> <li>▪ We have approval control systems and processes in place that checks and flags applicants who may be outside the Target Market.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Online channels (e.g., website and the mobile app)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The product cannot be distributed through online channels however the application process may commence online.</li> <li>▪ Applications commenced through an online channel will be directed through to a staff assisted channel.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (<b>BID</b>) obligations</li> </ul>	<ul style="list-style-type: none"> <li>▪ A distributor must:             <ul style="list-style-type: none"> <li>○ hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;</li> <li>○ comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and</li> <li>○ comply with their legal obligations.</li> </ul> </li> <li>▪ Third party brokers must also:             <ul style="list-style-type: none"> <li>○ hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and</li> <li>○ comply with their obligation to act in the best interests of their client when providing credit assistance.</li> </ul> </li> <li>▪ These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.</li> </ul>

## Target Market Determination for Vibe SMSF -Fixed Investment Product

### Review Triggers

Columbus has outlined below its review triggers of this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers of this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance;</li> <li>▪ Unexpected early-stage arrears are detected;</li> <li>▪ A significant number of defaults occur;</li> <li>▪ A significant number of late repayments are being recorded;</li> <li>▪ Evidence that the product or distributor conduct are significantly different to the target market.</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>▪ A significant number of material complaints are received from consumers in relation to the product.</li> </ul>
Incident Data	<ul style="list-style-type: none"> <li>▪ A material incident or significant number of incidents in relation to the product's design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
Changes to the Product	<ul style="list-style-type: none"> <li>▪ The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>
Significant Dealings	<ul style="list-style-type: none"> <li>▪ A significant dealing of the product to consumers outside the target market occurs.</li> </ul>
Notification from ASIC	<ul style="list-style-type: none"> <li>▪ The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul>

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

## Target Market Determination for Vibe SMSF -Fixed Investment Product

### Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
<b>Complaints</b>	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
<b>Feedback</b>	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
<b>Information requested</b>	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.

## Target Market Determination for Vibe – Variable Product

This Target Market Determination (**TMD**), which is required by law, is to make sure that our customers’ objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances that will cause us to review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

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Product	Prime – Vibe Variable Product with an [optional] Visa Debit Card (for Australian residents only)
<b>Product Manager</b>	Columbus Capital Pty Ltd ACN 119 531 252, trading as Origin Mortgage Management Services, Australian Credit Licence 337303
<b>Issuer</b>	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below:</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited ACN 000 341 533, Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242; and</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794;</li> </ul> <p>to be referred to as (<b>Columbus/we/us</b>).</p>
<b>Effective Date of TMD</b>	13 February 2024
<b>TMD Version</b>	2024.1
<b>Next Review Due</b>	At least every 2 years from the Effective Date of this Target Market Determination

\*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at [www.originmms.com.au](http://www.originmms.com.au).

## Target Market Determination

### for Vibe – Variable Product

#### Product Description and Key Attributes

Product Features	Prime – Owner Occupied and Investment Loans	Vibe Construction – Owner Occupied or Investment Loans
Interest Rate Type	Variable	Variable
Repayment Options	Principal and Interest OR Interest Only, is available for an agreed period	Principal and Interest OR Interest Only, is only available during the construction phase (maximum period of 12 months)
Redraw Facility	Redraw facility available which enables customers to access additional repayments made over and above the minimum required repayments.	Redraws are only allowed and processed for construction progressive payments only.
Visa Debit Card	Yes	Not available until construction is complete

#### Target Market

We have undertaken an assessment of the product and are of the view that the product attributes are likely to be consistent with the objectives and needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for target Market
<ul style="list-style-type: none"> <li>▪ Seeking a property loan with a range of features including repayments that can vary over the life of the loan for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, or renovating a residential owner occupied or investment property;</li> <li>○ purchase of house and land package;</li> <li>○ building and construction finance;</li> <li>○ consolidation of personal debt;</li> <li>○ personal needs or personal investments; and / or</li> <li>○ off the plan purchase</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The property loan account has a variable interest rate, meaning that repayments will vary based on changes to the interest rate.</li> <li>▪ The loan amount can be used for any one or more of the listed purposes.</li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Flexibility to make additional payments more than the required monthly repayment amount and</li> </ul>	<ul style="list-style-type: none"> <li>▪ Unlimited additional repayments (including the ability to pay the loan out early) can be made without additional charge.</li> </ul>

## Target Market Determination for Vibe – Variable Product

<p>switch between Principal &amp; Interest, Interest Only repayments</p>	<ul style="list-style-type: none"> <li>▪ A customer can switch between Principal &amp; Interest and Interest Only repayment methods (<b>T&amp;C apply</b>).</li> </ul>
<ul style="list-style-type: none"> <li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li> </ul>	<ul style="list-style-type: none"> <li>▪ Credit balances in the Offset Account will reduce the balance on which interest is charged.</li> <li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:             <ul style="list-style-type: none"> <li>○ Visa Debit Card (if the customer qualifies and it is not a construction loan);</li> <li>○ Online and Mobile Application access;</li> <li>○ Direct Debit and BPAY repayment facility;</li> <li>○ Staff assisted channels; and</li> <li>○ ATMs.</li> </ul> </li> </ul>

### Eligibility Criteria for the Product

**To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:**

- be at least 18 years of age and above;
- are individual borrowers (as single or joint borrowers);
- is either an Australian Citizen or a Permanent Resident of Australia;
- meets our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- a guarantor who supports the loan also meets our lending eligibility criteria.

### Financial Situation

**The financial situation of the Target Market are consumers that:**

- meet our lending eligibility and credit assessment criteria, which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers' deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer's ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.

## Target Market Determination

### for Vibe – Variable Product

#### Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"> <li>▪ Staff assisted channels (e.g., via email or phone)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our staff have the necessary training, knowledge, and accreditation (if required):               <ul style="list-style-type: none"> <li>○ to understand and can discuss the features and rates of our products;</li> <li>○ to understand and can discuss the key differences of our products;</li> <li>○ to assess whether the consumer is within the Target Market;</li> <li>○ to assess whether the consumer meets our lending eligibility lending criteria; and</li> <li>○ have access to product resources such as borrowing and repayment calculators, stamp duty and upfront cost calculator, and pricing tools etc.</li> </ul> </li> <li>▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place.</li> <li>▪ We have approval control systems and processes in place to check and flag applicants who may be outside the Target Market.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Online channels (e.g., website and the mobile app)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The product cannot be distributed through online channels however the application process may commence online.</li> <li>▪ Applications commenced through an online channel will be directed through to a staff assisted channel.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (BID) obligations</li> </ul>	<ul style="list-style-type: none"> <li>▪ A distributor must:               <ul style="list-style-type: none"> <li>○ hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;</li> <li>○ comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and</li> <li>○ comply with their legal obligations.</li> </ul> </li> </ul>



## Target Market Determination

### for Vibe – Variable Product

- Third party brokers must also:
  - hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and
  - comply with their obligation to act in the best interests of their client when providing credit assistance.
- These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.

## Review Triggers

Columbus has outlined below its review triggers for this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers for this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance;</li> <li>▪ Unexpected early-stage arrears are detected;</li> <li>▪ A significant number of defaults occur;</li> <li>▪ A significant number of late repayments are being recorded; and</li> <li>▪ Evidence that the product or distributor conduct are significantly different to the Target Market.</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>▪ A significant number of material complaints are received from consumers in relation to the product.</li> </ul>
Incident Data	<ul style="list-style-type: none"> <li>▪ A material incident or significant number of incidents in relation to the product's design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
Changes to the Product	<ul style="list-style-type: none"> <li>▪ The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>

## Target Market Determination

### for Vibe – Variable Product

Significant Dealings	<ul style="list-style-type: none"> <li>A significant dealing of the product to consumers outside the Target Market occurs.</li> </ul>
Notification from ASIC	<ul style="list-style-type: none"> <li>The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul>

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

## Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
Complaints	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
Feedback	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
Information requested	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.

## Target Market Determination

### for Vibe NDIS – Variable Product

This Target Market Determination (**TMD**), which is required by law, is to make sure that our customers’ objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances that will cause us to review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

***IMPORTANT:** This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant terms and conditions and credit guide and seek independent financial or legal advice before making any decision.*

<b>Product</b>	<b>Vibe NDIS – Variable Product with an [optional] Visa Debit Card (for Australian residents only)</b>
<b>Product Manager</b>	Columbus Capital Pty Ltd ACN 119 531 252, trading as Origin Mortgage Management Services, Australian Credit Licence 337303
<b>Issuer</b>	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below:</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited ACN 000 341 533, Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242; and</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794,</li> </ul> <p>to be referred to as <b>(Columbus/we/us)</b>.</p>
<b>Effective Date of TMD</b>	13 February 2024
<b>TMD Version</b>	2024.1
<b>Next Review Due</b>	At least every 2 years from the Effective Date of this Target Market Determination.

\*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at [www.originmms.com.au](http://www.originmms.com.au).

## Target Market Determination

### for Vibe NDIS – Variable Product

#### Product Description and Key Attributes

Product Features	NDIS – Owner Occupied and Investment Loans	NDIS Construction – Owner Occupied or Investment Loans
Interest Rate Type	Variable	Variable
Repayment Options	Principal and Interest OR Interest Only, is available for an agreed period	Principal and Interest OR Interest Only, is only available during the construction phase (maximum period of 12 months)
Redraw Facility	Redraw facility available which enables customers to access additional repayments made over and above the minimum required repayments.	Redraws are only allowed and processed for construction progressive payments only
Visa Debit Card	Yes	Not available until construction is complete

#### Target Market

We have undertaken an assessment of the product and are of the view that the product attributes are likely to be consistent with the objectives and needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for target Market
<ul style="list-style-type: none"> <li>▪ Seeking a property loan with a range of features including repayments that can vary over the life of the loan for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, renovating or investment in a Specialist Disability Accommodation (SDA) property;</li> <li>○ purchase of a SDA approved house and land package;</li> <li>○ building and construction finance for an SDA qualified property with a specialist disability accommodation provider;</li> <li>○ SDA approved property with an off the plan purchase.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The property loan account has a variable interest rate, meaning that repayments will vary based on changes to the interest rate.</li> <li>▪ The loan amount can be used for any one or more of the listed purposes for an SDA qualified or approved property.</li> <li>▪ Customer must have agreed terms to enter into a lease arrangement with a specialist disability accommodation provider within 90 days of drawdown of the loan or as soon as construction is complete.</li> </ul>

## Target Market Determination

### for Vibe NDIS – Variable Product

	<ul style="list-style-type: none"> <li>▪ Net funds paid to you via the specialist disability accommodation provider under the lease agreement, must be paid into your off-set account held with us.</li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Flexibility to make additional payments more than the required monthly repayment amount and switch between Principal &amp; Interest and Interest Only repayments</li> </ul>	<ul style="list-style-type: none"> <li>▪ Unlimited additional repayments (including the ability to repay the loan out early) can be made without additional charge.</li> <li>▪ A customer can switch between Principal and Interest and Interest Only repayment methods - T&amp;Cs will apply.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li> </ul>	<ul style="list-style-type: none"> <li>▪ Credit balances in the Offset Account will reduce the balance on which interest is charged.</li> <li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:               <ul style="list-style-type: none"> <li>○ Visa Debit Card (if the customer qualifies and it is not a construction loan)</li> <li>○ Online and Mobile Application access;</li> <li>○ Direct Debit and BPAY repayment facility;</li> <li>○ Staff assisted channels; and</li> <li>○ ATMs.</li> </ul> </li> </ul>

## Eligibility Criteria for the Product

**To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:**

- be at least 18 years of age and above;
- are individual borrowers (as single or joint borrowers);
- is either an Australian Citizen or a Permanent Resident of Australia;
- the property must be a qualified or approved SDA property
- must meet and continue to meet the requirements of the National Disability Insurance Scheme (**NDIS**) and provide requested evidence of meeting NDIS requirements;
- meet our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- a guarantor who supports the loan also meets our lending eligibility criteria.

## Target Market Determination

### for Vibe NDIS – Variable Product

#### Financial Situation

The financial situation of the Target Market are consumers that:

- meet our lending eligibility and credit assessment criteria, which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers’ deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer’s ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.

#### Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"> <li>▪ Staff assisted channels (e.g., via email or phone)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our staff have the necessary training, knowledge, and accreditation (if required):               <ul style="list-style-type: none"> <li>○ to understand and can discuss the features and rates of our products;</li> <li>○ to understand and can discuss the key differences of our products;</li> <li>○ to assess whether the consumer is within the Target Market;</li> <li>○ to assess whether the consumer meets our lending eligibility lending criteria; and</li> <li>○ have access to product resources such as borrowing and repayment calculators, stamp duty and upfront cost calculator, and pricing tools etc.</li> </ul> </li> <li>▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place.</li> <li>▪ We have approval control systems and processes in place to check and flag applicants who may be outside the Target Market.</li> </ul>

## Target Market Determination

### for Vibe NDIS – Variable Product

<ul style="list-style-type: none"> <li>Online channels (e.g., website and the mobile app)</li> </ul>	<ul style="list-style-type: none"> <li>The product cannot be distributed through online channels however the application process may commence online.</li> <li>Applications commenced through an online channel will be directed through to a staff assisted channel.</li> </ul>
<ul style="list-style-type: none"> <li>Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (BID) obligations</li> </ul>	<ul style="list-style-type: none"> <li>A distributor must:             <ul style="list-style-type: none"> <li>hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;</li> <li>comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and</li> <li>comply with their legal obligations.</li> </ul> </li> <li>Third party brokers must also:             <ul style="list-style-type: none"> <li>hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and</li> <li>comply with their obligation to act in the best interests of their client when providing credit assistance.</li> </ul> </li> <li>These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.</li> </ul>

## Review Triggers

Columbus has outlined below its review triggers for this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers for this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance.</li> <li>Unexpected early-stage arrears are detected.</li> <li>A significant number of defaults occur.</li> <li>A significant number of late repayments are being recorded.</li> </ul>

## Target Market Determination

### for Vibe NDIS – Variable Product

	<ul style="list-style-type: none"> <li>Evidence that the product or distributor conduct are significantly different to the Target Market.</li> </ul>
<b>Complaints</b>	<ul style="list-style-type: none"> <li>A significant number of material complaints are received from consumers in relation to the product.</li> </ul>
<b>Incident Data</b>	<ul style="list-style-type: none"> <li>A material incident or significant number of incidents in relation to the product’s design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
<b>Changes to the Product</b>	<ul style="list-style-type: none"> <li>The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>
<b>Significant Dealings</b>	<ul style="list-style-type: none"> <li>A significant dealing of the product to consumers outside the Target Market occurs.</li> </ul>
<b>Notification from ASIC</b>	<ul style="list-style-type: none"> <li>The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul>

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

## Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
<b>Complaints</b>	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.



## Target Market Determination

### for Vibe NDIS – Variable Product

<b>Feedback</b>	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
<b>Information requested</b>	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.

## Target Market Determination

### for Vibe NDIS – Fixed Product

This Target Market Determination (**TMD**), which is required by law, is to make sure that our customers’ objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances that will cause us to review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

***IMPORTANT:** This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant terms and conditions and credit guide and seek independent financial or legal advice before making any decision.*

Product	Vibe NDIS – Fixed Product with an [optional] Visa Debit Card (for Australian residents only)
Product Manager	Columbus Capital Pty Ltd ACN 119 531 252, trading as Origin Mortgage Management Services, Australian Credit Licence 337303
Issuer	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below:</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited ACN 000 341 533, Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242; and</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794,</li> </ul> <p>to be referred to as <b>(Columbus/we/us)</b>.</p>
Effective Date of TMD	13 February 2024
TMD Version	2024.1
Next Review Due	At least every 2 years from the Effective Date of this Target Market Determination

\*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at [www.originmms.com.au](http://www.originmms.com.au).

## Target Market Determination

### for Vibe NDIS – Fixed Product

#### Product Description and Key Attributes

Product Features	NDIS – Owner Occupied and Investment Loans	NDIS Construction – Owner Occupied or Investment Loans
Interest Rate Type	Fixed	Fixed
Repayment Options	Principal and Interest OR Interest Only, is available for an agreed period	Principal and Interest OR Interest Only, is only available during the construction phase (maximum period of 12 months)
Redraw Facility	Redraw facility available which enables customers to access additional repayments made over and above the minimum required repayments.	Redraws are only allowed and processed for construction progressive payments only.
Visa Debit Card	Yes (for Australian residents only)	Not available until construction is complete

#### Target Market

We have undertaken an assessment of the product and are of the view that the product attributes are likely to be consistent with the objectives and needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for target Market
<ul style="list-style-type: none"> <li>▪ Seeking a property loan with a range of features including repayments that can vary over the life of the loan for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, renovating or investment in a Specialist Disability Accommodation (SDA) property;</li> <li>○ purchase of a SDA approved house and land package;</li> <li>○ building and construction finance for an SDA qualified property with a specialist disability accommodation provider; and</li> <li>○ SDA approved property with an off the plan purchase.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The property loan account will have a fixed interest rate between 1 and 5 years, meaning repayments will be fixed for the selected term.</li> <li>▪ Additional charges including an early repayment adjustment (ERA) may apply if a customer wishes to break their fixed term early or pay the loan out early.</li> <li>▪ The Fixed Rate loan will change to a Standard Variable Rate loan, after the set fixed interest period expires. The interest rate and repayments will become variable, unless it is switched to another loan type including a new Fixed Rate loan.</li> <li>▪ Customer must have agreed terms to enter into a lease arrangement with a specialist disability accommodation provider within 90 days of drawdown of the loan or as soon as construction is complete.</li> </ul>

## Target Market Determination

### for Vibe NDIS – Fixed Product

	<ul style="list-style-type: none"> <li>▪ Net funds paid to you via the specialist disability accommodation provider under the lease agreement, must be paid into your off-set account held with us.</li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Flexibility to make additional payments more than the required monthly repayment amount up to \$20,000 per annum and switch between Principal &amp; Interest and Interest Only repayments</li> </ul>	<ul style="list-style-type: none"> <li>▪ Extra repayments of up to \$20,000 per annum, can be made without additional charges.</li> <li>▪ A customer can switch between Principal and Interest and Interest Only repayment methods - T&amp;Cs will apply.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li> </ul>	<ul style="list-style-type: none"> <li>▪ Credit balances in the Offset Account will reduce the balance on which interest is charged.</li> <li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:               <ul style="list-style-type: none"> <li>○ Visa Debit Card (if the customer qualifies and it is not a construction loan);</li> <li>○ Online and Mobile Application access;</li> <li>○ Direct Debit and BPAY repayment facility;</li> <li>○ Staff assisted channels; and</li> <li>○ ATMs.</li> </ul> </li> </ul>

## Eligibility Criteria for the Product

To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:

- be at least 18 years of age and above;
- are individual borrowers (as single or joint borrowers);
- is either an Australian Citizen or a Permanent Resident of Australia;
- the property must be a qualified or approved SDA property.
- must meet and continue to meet the requirements of the National Disability Insurance Scheme (NDIS) and provide requested evidence of meeting NDIS requirements;
- meet our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- a guarantor who supports the loan also meets our lending eligibility criteria.

## Target Market Determination

### for Vibe NDIS – Fixed Product

#### Financial Situation

The financial situation of the Target Market are consumers that:

- meet our lending eligibility and credit assessment criteria, which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers’ deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer’s ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.

#### Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"> <li>▪ Staff assisted channels (e.g., via email or phone)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our staff have the necessary training, knowledge, and accreditation (if required):               <ul style="list-style-type: none"> <li>○ to understand and can discuss the features and rates of our products;</li> <li>○ to understand and can discuss the key differences of our products;</li> <li>○ to assess whether the consumer is within the Target Market;</li> <li>○ to assess whether the consumer meets our lending eligibility lending criteria; and</li> <li>○ have access to product resources such as borrowing and repayment calculators, stamp duty and upfront cost calculator, and pricing tools etc.</li> </ul> </li> <li>▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place.</li> <li>▪ We have approval control systems and processes in place to check and flag applicants who may be outside the Target Market.</li> </ul>

## Target Market Determination

### for Vibe NDIS – Fixed Product

<ul style="list-style-type: none"> <li>Online channels (e.g., website and the mobile app)</li> </ul>	<ul style="list-style-type: none"> <li>The product cannot be distributed through online channels however the application process may commence online.</li> <li>Applications commenced through an online channel will be directed through to a staff assisted channel.</li> </ul>
<ul style="list-style-type: none"> <li>Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (BID) obligations</li> </ul>	<ul style="list-style-type: none"> <li>A distributor must:             <ul style="list-style-type: none"> <li>hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;</li> <li>comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and</li> <li>comply with their legal obligations.</li> </ul> </li> <li>Third party brokers must also:             <ul style="list-style-type: none"> <li>hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and</li> <li>comply with their obligation to act in the best interests of their client when providing credit assistance.</li> </ul> </li> <li>These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.</li> </ul>

## Review Triggers

Columbus has outlined below its review triggers for this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers for this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance.</li> <li>Unexpected early-stage arrears are detected.</li> <li>A significant number of defaults occur.</li> <li>A significant number of late repayments are being recorded.</li> <li>Evidence that the product or distributor conduct are significantly different to the Target Market.</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>A significant number of material complaints are received from consumers in relation to the product.</li> </ul>

## Target Market Determination

### for Vibe NDIS – Fixed Product

<b>Incident Data</b>	<ul style="list-style-type: none"> <li>A material incident or significant number of incidents in relation to the product’s design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
<b>Changes to the Product</b>	<ul style="list-style-type: none"> <li>The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>
<b>Significant Dealings</b>	<ul style="list-style-type: none"> <li>A significant dealing of the product to consumers outside the Target Market occurs.</li> </ul>
<b>Notification from ASIC</b>	<ul style="list-style-type: none"> <li>The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul>

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

## Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
<b>Complaints</b>	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
<b>Feedback</b>	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
<b>Information requested</b>	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.

## Target Market Determination

### for Vibe – Fixed Product

This Target Market Determination (**TMD**), which is required by law, is to make sure that our customers’ objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances that will cause us to review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

***IMPORTANT:** This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant terms and conditions and credit guide and seek independent financial or legal advice before making any decision.*

<b>Product</b>	<b>Prime – Vibe Fixed Product with an [optional] Visa Debit Card (for Australian residents only)</b>
<b>Product Manager</b>	Columbus Capital Pty Ltd ACN 119 531 252, trading as Origin Mortgage Management Services, Australian Credit Licence 337303
<b>Issuer</b>	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below.</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited ACN 000 341 533, Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242; and</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794;</li> </ul> <p>to be referred to as <b>(Columbus/we/us)</b>.</p>
<b>Effective Date of TMD</b>	13 February 2024
<b>TMD Version</b>	2024.1
<b>Next Review Due:</b>	At least every 2 years from the Effective Date of this Target Market Determination

**\*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at [www.originmms.com.au](http://www.originmms.com.au).**



## Target Market Determination

### for Vibe – Fixed Product

#### Product Description and Key Attributes

Product Features	Prime – Owner Occupied and Investment Loans	Prime Construction – Owner Occupied or Investment Loans
Interest Rate Type	Fixed	Fixed
Repayment Options	Principal and Interest OR Interest Only, is available for an agreed period	Principal and Interest OR Interest Only, is only available during the construction phase (maximum period of 12 months)
Redraw Facility	Redraw facility available which enables customers to access additional repayments made over and above the minimum required repayments.	Redraws are only allowed and processed for construction progressive payments only.
Visa Debit Card	Yes	Not available until construction is complete

#### Target Market

We have undertaken an assessment of the product and are of the view that the product attributes are likely to be consistent with the objectives and needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for target Market
<ul style="list-style-type: none"> <li>▪ Seeking a property loan with certainty of fixed repayments over a set period for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, or renovating a residential owner occupied or investment property;</li> <li>○ purchase of house and land package;</li> <li>○ building and construction finance;</li> <li>○ consolidation of personal debt;</li> <li>○ personal needs or personal investments; and / or</li> <li>○ off the plan purchase.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The property loan account will receive a fixed interest rate between 1 and 5 years, meaning repayments will be fixed for the selected term.</li> <li>▪ The Fixed Rate loan will change to a Standard Variable Rate loan after the set fixed interest period expires. The interest rate and repayments will become variable, unless it is switched to another loan type including a new Fixed Rate loan.</li> <li>▪ Additional charges including an early repayment adjustment (<b>ERA</b>) may apply if a customer wishes to break their fixed term early.</li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>

## Target Market Determination

### for Vibe – Fixed Product

<ul style="list-style-type: none"><li>▪ Flexibility to make additional payments more than the required monthly repayment amount up to \$20,000 per annum and switch between Principal &amp; Interest and Interest Only repayments</li></ul>	<ul style="list-style-type: none"><li>▪ Extra repayments of up to \$20,000 per annum, can be made without additional charges.</li><li>▪ A customer can switch between Principal and Interest and Interest Only repayment methods - T&amp;Cs will apply.</li></ul>
<ul style="list-style-type: none"><li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li></ul>	<ul style="list-style-type: none"><li>▪ Credit balances in the Offset Account will reduce the balance on which interest is charged.</li><li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:<ul style="list-style-type: none"><li>○ Visa Debit Card (if the customer qualifies and it is not a construction loan);</li><li>○ Online and Mobile Application access;</li><li>○ Direct Debit and BPAY repayment facility;</li><li>○ Staff assisted channels; and</li><li>○ ATMs.</li></ul></li></ul>

## Eligibility Criteria for the Product

To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:

- be at least 18 years of age and above;
- are individual borrowers (as single or joint borrowers);
- is an Australian Citizen or a Permanent Resident of Australia;
- meets our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- a guarantor who supports the loan also meets our lending eligibility criteria.

## Financial Situation

The financial situation of the Target Market are consumers that:

- meet our lending eligibility and credit assessment criteria, which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers' deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer's ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.

## Target Market Determination

### for Vibe – Fixed Product

#### Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"> <li>▪ Staff assisted channels (e.g., via email or phone)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our staff have the necessary training, knowledge, and accreditation (if required):               <ul style="list-style-type: none"> <li>○ to understand and can discuss the features and rates of our products;</li> <li>○ to understand and can discuss the key differences of our products;</li> <li>○ to assess whether the consumer is within the Target Market;</li> <li>○ to assess whether the consumer meets our lending eligibility lending criteria; and</li> <li>○ have access to product resources such as borrowing and repayment calculators, stamp duty and upfront cost calculator, and pricing tools etc.</li> </ul> </li> <li>▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place.</li> <li>▪ We have approval control systems and processes in place to check and flag applicants who may be outside the Target Market.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Online channels (e.g., website and the mobile app)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The product cannot be distributed through online channels however the application process may commence online.</li> <li>▪ Applications commenced through an online channel will be directed through to a staff assisted channel.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (<b>BID</b>) obligations</li> </ul>	<ul style="list-style-type: none"> <li>▪ A distributor must:               <ul style="list-style-type: none"> <li>○ hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;</li> <li>○ comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and</li> <li>○ comply with their legal obligations.</li> </ul> </li> </ul>

## Target Market Determination

### for Vibe – Fixed Product

- Third party brokers must also:
  - hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and
  - comply with their obligation to act in the best interests of their client when providing credit assistance.
- These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.

## Review Triggers

Columbus has outlined below its review triggers for this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers for this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance;</li> <li>▪ Unexpected early-stage arrears are detected;</li> <li>▪ A significant number of defaults occur;</li> <li>▪ A significant number of late repayments are being recorded;</li> <li>▪ Evidence that the product or distributor conduct are significantly different to the Target Market.</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>▪ A significant number of material complaints are received from consumers in relation to the product.</li> </ul>
Incident Data	<ul style="list-style-type: none"> <li>▪ A material incident or significant number of incidents in relation to the product's design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
Changes to the Product	<ul style="list-style-type: none"> <li>▪ The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>
Significant Dealings	<ul style="list-style-type: none"> <li>▪ A significant dealing of the product to consumers outside the Target Market occurs.</li> </ul>

## Target Market Determination for Vibe – Fixed Product

### Notification from ASIC

- The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

## Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
Complaints	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
Feedback	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
Information requested	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.

## Target Market Determination

### for Vibe – Fixed Product

This Target Market Determination (**TMD**), which is required by law, is to make sure that our customers’ objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances that will cause us to review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

***IMPORTANT:** This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant terms and conditions and credit guide and seek independent financial or legal advice before making any decision.*

<b>Product</b>	<b>Prime – Vibe Fixed Product with an [optional] Visa Debit Card (for Australian residents only)</b>
<b>Product Manager</b>	Columbus Capital Pty Ltd ACN 119 531 252, trading as Origin Mortgage Management Services, Australian Credit Licence 337303
<b>Issuer</b>	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below.</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited ACN 000 341 533, Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242; and</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794;</li> </ul> <p>to be referred to as <b>(Columbus/we/us)</b>.</p>
<b>Effective Date of TMD</b>	13 February 2024
<b>TMD Version</b>	2024.1
<b>Next Review Due:</b>	At least every 2 years from the Effective Date of this Target Market Determination

**\*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at [www.originmms.com.au](http://www.originmms.com.au).**

## Target Market Determination

### for Vibe – Fixed Product

#### Product Description and Key Attributes

Product Features	Prime – Owner Occupied and Investment Loans	Prime Construction – Owner Occupied or Investment Loans
Interest Rate Type	Fixed	Fixed
Repayment Options	Principal and Interest OR Interest Only, is available for an agreed period	Principal and Interest OR Interest Only, is only available during the construction phase (maximum period of 12 months)
Redraw Facility	Redraw facility available which enables customers to access additional repayments made over and above the minimum required repayments.	Redraws are only allowed and processed for construction progressive payments only.
Visa Debit Card	Yes	Not available until construction is complete

#### Target Market

We have undertaken an assessment of the product and are of the view that the product attributes are likely to be consistent with the objectives and needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for target Market
<ul style="list-style-type: none"> <li>▪ Seeking a property loan with certainty of fixed repayments over a set period for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, or renovating a residential owner occupied or investment property;</li> <li>○ purchase of house and land package;</li> <li>○ building and construction finance;</li> <li>○ consolidation of personal debt;</li> <li>○ personal needs or personal investments; and / or</li> <li>○ off the plan purchase.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The property loan account will receive a fixed interest rate between 1 and 5 years, meaning repayments will be fixed for the selected term.</li> <li>▪ The Fixed Rate loan will change to a Standard Variable Rate loan after the set fixed interest period expires. The interest rate and repayments will become variable, unless it is switched to another loan type including a new Fixed Rate loan.</li> <li>▪ Additional charges including an early repayment adjustment (<b>ERA</b>) may apply if a customer wishes to break their fixed term early.</li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>

## Target Market Determination

### for Vibe – Fixed Product

<ul style="list-style-type: none"><li>▪ Flexibility to make additional payments more than the required monthly repayment amount up to \$20,000 per annum and switch between Principal &amp; Interest and Interest Only repayments</li></ul>	<ul style="list-style-type: none"><li>▪ Extra repayments of up to \$20,000 per annum, can be made without additional charges.</li><li>▪ A customer can switch between Principal and Interest and Interest Only repayment methods - T&amp;Cs will apply.</li></ul>
<ul style="list-style-type: none"><li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li></ul>	<ul style="list-style-type: none"><li>▪ Credit balances in the Offset Account will reduce the balance on which interest is charged.</li><li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:<ul style="list-style-type: none"><li>○ Visa Debit Card (if the customer qualifies and it is not a construction loan);</li><li>○ Online and Mobile Application access;</li><li>○ Direct Debit and BPAY repayment facility;</li><li>○ Staff assisted channels; and</li><li>○ ATMs.</li></ul></li></ul>

## Eligibility Criteria for the Product

To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:

- be at least 18 years of age and above;
- are individual borrowers (as single or joint borrowers);
- is an Australian Citizen or a Permanent Resident of Australia;
- meets our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- a guarantor who supports the loan also meets our lending eligibility criteria.

## Financial Situation

The financial situation of the Target Market are consumers that:

- meet our lending eligibility and credit assessment criteria, which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers' deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer's ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.



## Target Market Determination

### for Vibe – Fixed Product

#### Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"> <li>▪ Staff assisted channels (e.g., via email or phone)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our staff have the necessary training, knowledge, and accreditation (if required):               <ul style="list-style-type: none"> <li>○ to understand and can discuss the features and rates of our products;</li> <li>○ to understand and can discuss the key differences of our products;</li> <li>○ to assess whether the consumer is within the Target Market;</li> <li>○ to assess whether the consumer meets our lending eligibility lending criteria; and</li> <li>○ have access to product resources such as borrowing and repayment calculators, stamp duty and upfront cost calculator, and pricing tools etc.</li> </ul> </li> <li>▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place.</li> <li>▪ We have approval control systems and processes in place to check and flag applicants who may be outside the Target Market.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Online channels (e.g., website and the mobile app)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The product cannot be distributed through online channels however the application process may commence online.</li> <li>▪ Applications commenced through an online channel will be directed through to a staff assisted channel.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (<b>BID</b>) obligations</li> </ul>	<ul style="list-style-type: none"> <li>▪ A distributor must:               <ul style="list-style-type: none"> <li>○ hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;</li> <li>○ comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and</li> <li>○ comply with their legal obligations.</li> </ul> </li> </ul>

## Target Market Determination

### for Vibe – Fixed Product

- Third party brokers must also:
  - hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and
  - comply with their obligation to act in the best interests of their client when providing credit assistance.
- These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.

## Review Triggers

Columbus has outlined below its review triggers for this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers for this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance;</li> <li>▪ Unexpected early-stage arrears are detected;</li> <li>▪ A significant number of defaults occur;</li> <li>▪ A significant number of late repayments are being recorded;</li> <li>▪ Evidence that the product or distributor conduct are significantly different to the Target Market.</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>▪ A significant number of material complaints are received from consumers in relation to the product.</li> </ul>
Incident Data	<ul style="list-style-type: none"> <li>▪ A material incident or significant number of incidents in relation to the product's design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
Changes to the Product	<ul style="list-style-type: none"> <li>▪ The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>
Significant Dealings	<ul style="list-style-type: none"> <li>▪ A significant dealing of the product to consumers outside the Target Market occurs.</li> </ul>

## Target Market Determination

### for Vibe – Fixed Product

#### Notification from ASIC

- The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

## Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
Complaints	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
Feedback	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
Information requested	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.

## Target Market Determination for Expat – Variable Product

This Target Market Determination (**TMD**), which is required by law, is to make sure that our customers' objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances that will cause us to review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

***IMPORTANT:** This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant terms and conditions and credit guide and seek independent financial or legal advice before making any decision.*

Product	Vibe Expat – Variable Product with an [optional] Visa Debit Card (for Australian residents only)
Product Manager	Columbus Capital Pty Ltd ACN 119 531 252, trading as Origin Mortgage Management Services, Australian Credit Licence 337303
Issuer	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below:</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited ACN 000 341 533, Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242; and</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794,</li> </ul> <p>to be referred to as <b>(Columbus/we/us)</b>.</p>
Effective Date of TMD	13 February 2024
TMD Version	2024.1
Next Review Due	At least every 2 years from the Effective Date of this Target Market Determination

\*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at [www.originmms.com.au](http://www.originmms.com.au).

## Target Market Determination

### for Expat – Variable Product

#### Product Description and Key Attributes

Product Features	Expat – Owner Occupied and Investment Loans	Expat Construction – Owner Occupied or Investment Loans
Interest Rate Type	Variable	Variable
Repayment Options	Principal and Interest OR Interest Only, is available for an agreed period	Principal and Interest OR Interest Only, is only available during the construction phase (maximum period of 12 months)
Redraw Facility	Redraw facility available which enables customers to access additional repayments made over and above the minimum required repayments	Redraws are only allowed and processed for construction progressive payments only
Visa Debit Card	Yes (for Australian residents only)	Not available until construction is complete

#### Target Market

We have undertaken an assessment of the product and are of the view that the product attributes are likely to be consistent with the objectives and needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for Target Market
<ul style="list-style-type: none"> <li>▪ Seeking a property loan with a range of features including repayments that can vary over the life of the loan for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, or renovating a residential owner occupied or investment property;</li> <li>○ purchase of house and land package;</li> <li>○ building and construction finance;</li> <li>○ personal needs or personal investments; and/or</li> <li>○ off the plan purchase</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The property loan account has a variable interest rate, meaning that repayments will vary based on changes to the interest rate.</li> <li>▪ The loan amount can be used for any one or more of the listed purposes.</li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Flexibility to make additional payments more than the required monthly repayment amount and switch between Principal &amp; Interest and Interest Only repayments</li> </ul>	<ul style="list-style-type: none"> <li>▪ Unlimited additional repayments (including the ability to pay the loan out early) can be made without additional charge.</li> <li>▪ A customer can switch between Principal and Interest and Interest Only repayment methods - T&amp;Cs will apply.</li> </ul>

## Target Market Determination for Expat – Variable Product

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| <ul style="list-style-type: none"><li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li></ul> | <ul style="list-style-type: none"><li>▪ Credit balances in the Offset Account will reduce the balance on which interest is charged.</li><li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:<ul style="list-style-type: none"><li>○ Visa Debit Card (if the customer qualifies and it is not a construction loan);</li><li>○ Online and Mobile Application access;</li><li>○ Direct Debit Facility and BPAY;</li><li>○ Staff assisted channels; and</li><li>○ ATMs.</li></ul></li></ul> |
|---|--|
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### Eligibility Criteria for the Product

**To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:**

- be at least 18 years of age and above;
- are individual borrowers (as single or joint borrowers); and
- is either:
  - an Australian Citizen that does not reside in Australia; or
  - a Permanent or Temporary Resident of Australia, with an acceptable Visa or a New Zealand Citizen that does not reside in Australia or New Zealand; or
  - a Permanent or Temporary Resident of Australia, or Citizen of Australia, who requires a Foreign Income to cover Australian Debt Obligations; and
  - the Visa for a Permanent or Temporary Resident of Australia, must have a minimum of 6 months validity (155 Visas are excluded); or
  - the residential address of the borrower is limited to our “*Acceptable Countries*” list, in accordance with our lending policy;
- meet our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- a guarantor who supports the loan also meets our lending eligibility criteria.

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### Financial Situation

**The financial situation of the Target Market are consumers that:**

- meet our lending eligibility and credit assessment criteria, which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers’ deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumers’ ability to service the loan, which is our process of determining that the product is consistent with the financial situation of the Target Market.

## Target Market Determination

### for Expat – Variable Product

#### Distribution Conditions & Approved Channels

Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the Target Market in accordance with our process requirements.

Distribution Channels	Product Distribution
<ul style="list-style-type: none"> <li>▪ Staff assisted channels (e.g., via email or phone)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our staff have the necessary training, knowledge, and accreditation (if required):               <ul style="list-style-type: none"> <li>○ to understand and can discuss the features and rates of our products;</li> <li>○ to understand and can discuss the key differences of our products;</li> <li>○ to assess whether the consumer is within the Target Market;</li> <li>○ to assess whether the consumer meets our lending eligibility lending criteria; and</li> <li>○ have access to product resources such as borrowing and repayment calculators, stamp duty and upfront cost calculator, and pricing tools etc.</li> </ul> </li> <li>▪ Our staff are part of assurance programs, and we rely on existing distributors, methods, controls, and supervision already in place.</li> <li>▪ We have approval control systems and processes in place to check and flag applicants who may be outside the Target Market.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Online channels (e.g., website and the mobile app)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The product cannot be distributed through online channels however the application process may commence online.</li> <li>▪ Applications commenced through an online channel will be directed through to a staff assisted channel.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Third party – Mortgage Managers and Accredited mortgage brokers subject to their Best Interests Duty (<b>BID</b>) obligations</li> </ul>	<ul style="list-style-type: none"> <li>▪ A distributor must:               <ul style="list-style-type: none"> <li>○ hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee;</li> <li>○ comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager; and</li> <li>○ comply with their legal obligations.</li> </ul> </li> </ul>

## Target Market Determination

### for Expat – Variable Product

- Third party brokers must also:
  - hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and
  - comply with their obligation to act in the best interests of their client when providing credit assistance.
- These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.

## Review Triggers

Columbus has outlined below its review triggers for this product (**Review Triggers**). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers for this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance.</li> <li>▪ Unexpected early-stage arrears are detected.</li> <li>▪ A significant number of defaults occur.</li> <li>▪ A significant number of late repayments are being recorded.</li> <li>▪ Evidence that the product or distributor conduct are significantly different to the Target Market.</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>▪ A significant number of material complaints are received from consumers in relation to the product.</li> </ul>
Incident Data	<ul style="list-style-type: none"> <li>▪ A material incident or significant number of incidents in relation to the product's design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
Changes to the Product	<ul style="list-style-type: none"> <li>▪ The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>
Significant Dealings	<ul style="list-style-type: none"> <li>▪ A significant dealing of the product to consumers outside the Target Market occurs.</li> </ul>



## Target Market Determination

### for Expat – Variable Product

<b>Notification from ASIC</b>	<ul style="list-style-type: none"> <li>The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul>
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If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

### Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
<b>Complaints</b>	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
<b>Feedback</b>	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
<b>Information requested</b>	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.

## Target Market Determination

### for Vibe Expat – Fixed Product

This Target Market Determination (**TMD**), which is required by law, is to make sure that our customers’ objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances that will cause us to review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

***IMPORTANT:** This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant terms and conditions and credit guide and seek independent financial or legal advice before making any decision.*

Product	Vibe Expat – Fixed Product with an [optional] Visa Debit Card (for Australian residents only)
Product Manager	Columbus Capital Pty Ltd ACN 119 531 252, trading as Origin Mortgage Management Services, Australian Credit Licence 337303
Issuer	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager.</p> <p>The product could be issued by any of the Lenders* named below:</p> <ul style="list-style-type: none"> <li>(a) Perpetual Corporate Trust Limited ACN 000 341 533, Australian Credit Licence 392673;</li> <li>(b) Pioneer First Australia Pty Limited ACN 086 092 613;</li> <li>(c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721;</li> <li>(d) Origin Money Pty Ltd ACN 621 866 242; and</li> <li>(e) Origin Mortgages Pty Ltd ACN 629 566 794,</li> </ul> <p>to be referred to as (<b>Columbus/we/us</b>).</p>
Effective Date of TMD	13 February 2024
TMD Version	2024.1
Next Review Due	At least every 2 years from the Effective Date of this Target Market Determination

\*The Visa Debit Card is issued by Indue Ltd ACN 087 822 464. Refer to Visa Debit Card Conditions of Use and Target Market Determination for the Visa Debit Card at [www.originmms.com.au](http://www.originmms.com.au).

## Target Market Determination

### for Vibe Expat – Fixed Product

#### Product Description and Key Attributes

Product Features	Expat – Owner Occupied and Investment Loans	Expat Construction – Owner Occupied or Investment Loans
Interest Rate Type	Fixed	Fixed
Repayment Options	Principal and Interest OR Interest Only, is available for an agreed period	Principal and Interest OR Interest Only, is only available during the construction phase (maximum period of 12 months)
Redraw Facility	Redraw facility available which enables customers to access additional repayments made over and above the minimum required repayments	Redraws are only allowed and processed for construction progressive payments only
Visa Debit Card	Yes (for Australian residents only)	Not available until construction is complete

#### Target Market

We have undertaken an assessment of the product and are of the view that the product attributes are likely to be consistent with the objectives and needs of the Target Market.

Product designed for customers who:	Key Product attributes appropriate for Target Market
<ul style="list-style-type: none"> <li>▪ Seeking a property loan with the certainty of fixed repayments over a set period for any of the following purposes:               <ul style="list-style-type: none"> <li>○ purchasing, refinancing, or renovating a residential owner occupied or investment property;</li> <li>○ purchase of house and land package;</li> <li>○ building and construction finance;</li> <li>○ personal needs or personal investments; and/or</li> <li>○ off the plan purchase</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The property loan account will receive a fixed interest rate between 1 and 5 years, meaning repayments will be fixed for the selected term.</li> <li>▪ Additional charges including an early repayment adjustment (<b>ERA</b>) may apply if a customer wishes to break the fixed term early or pay the loan out early.</li> <li>▪ The Fixed Rate loan will change to a Standard Variable Rate loan, after the set fixed interest period expires. The interest rate and repayments will become variable, unless it is switched to another loan type including a new Fixed Rate loan.</li> <li>▪ Fees, charges, and third-party costs will be payable.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Flexibility to make additional payments more than the required monthly repayment amount up to</li> </ul>	<ul style="list-style-type: none"> <li>▪ Extra repayments of up to \$20,000 per annum, can be made without additional charges.</li> </ul>

## Target Market Determination

### for Vibe Expat – Fixed Product

<p>\$20,000 per annum and switch between Principal &amp; Interest and Interest Only repayments</p>	<ul style="list-style-type: none"> <li>▪ A customer can switch between Principal and Interest and Interest Only repayment methods - T&amp;Cs will apply.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan</li> </ul>	<ul style="list-style-type: none"> <li>▪ Credit balances in the Offset Account will reduce the balance on which interest is charged.</li> <li>▪ Customers can deposit, withdraw, or transact on the account via a broad range of channels by using:               <ul style="list-style-type: none"> <li>○ Visa Debit Card (if the customer qualifies and it is not a construction loan);</li> <li>○ Online and Mobile Application access;</li> <li>○ Direct Debit Facility and BPAY;</li> <li>○ Staff assisted channels; and</li> <li>○ ATMs.</li> </ul> </li> </ul>

## Eligibility Criteria for the Product

**To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:**

- be at least 18 years of age and above;
- are individual borrowers (as single or joint borrowers); and
- is either:
  - an Australian Citizen that does not reside in Australia; or
  - a Permanent or Temporary Resident of Australia, with an acceptable Visa or a New Zealand Citizen that does not reside in Australia or New Zealand; or
  - a Permanent or Temporary Resident of Australia, or Citizen of Australia, who requires a Foreign Income to cover Australian Debt Obligations; and
  - the Visa for a Permanent or Temporary Resident of Australia, must have a minimum of 6 months validity (155 Visas are excluded); or
  - the residential address of the borrower is limited to our “*Acceptable Countries*” list, in accordance with our lending policy;
- meet our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- a guarantor who supports the loan also meets our lending eligibility criteria.

## Financial Situation

**The financial situation of the Target Market are consumers that:**

- meet our lending eligibility and credit assessment criteria which includes demonstrating serviceability of the loan;
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## Target Market Determination

### for Vibe Expat – Fixed Product

- where determined by us to be required, (based on the customers’ deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

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Changes to the Product	<ul style="list-style-type: none"> <li>▪ The material alteration of the product or product terms and conditions (e.g., adding to, removing, or changing a key product attribute; significant change to distribution channel and distribution strategy).</li> </ul>
Significant Dealings	<ul style="list-style-type: none"> <li>▪ A significant dealing of the product to consumers outside the Target Market occurs.</li> </ul>

## Target Market Determination

### for Vibe Expat – Fixed Product

Notification from ASIC	<ul style="list-style-type: none"> <li>The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.</li> </ul>
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Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
Feedback	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
Information requested	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.