

Target Market Determination

Nil End Debt Home Loan

This document is the Target Market Determination (**TMD**) for the Resolve Home Loans Nil End Debt Home Loan.

A Target Market Determination (**TMD**) is a written document that:

- describes the class of customers that make up the target market for the Resolve Home Loans Nil End Debt Home Loan (**Target Market**);
- specifies any conditions and restrictions on the distribution of the product (**Distribution Conditions**); and
- sets out the events or circumstances where we are required to review the TMD (**Review Triggers**).

We are required to have a TMD by law. This TMD is not a recommendation to acquire a *Resolve Home Loans Nil End Debt Home Loan* nor does it replace our terms and conditions or other disclosure documents that we or one of accredited brokers (acting under an Australian Credit Licence) (**Distributors**) may provide to you.

Issuer (Bluebay, we, us, our)	Bluebay Home Loans Pty Ltd ACN 127 824 524 trading as Resolve Home Loans
Australian Credit License Number	389250
Date TMD approved	5 October 2021
TMD Version	1.0
Initial Review Period	One year after the date of this TMD
Subsequent Review Periods	Every third anniversary of the date of this TMD

Target Market Description

Product description and key attributes

The Resolve Home Loans Nil End Debt Home Loan is a ‘home to home’ loan that assists borrowers who have signed a contract for a ‘house and land package’ with one of the ABN Group Building Companies, but who have not yet sold their current property (**Existing Property**).

The key attributes of the Resolve Home Loans Nil End Debt Home Loan are:

- Loan Term – maximum 12 months;
- Interest Rate – variable interest rate;
- Maximum Loan Amount – varies depending on the customer’s financial circumstances and the amount of equity in the Existing Property;
- Repayments – interest is capitalised over the Loan Term (therefore, no repayments are required during the Loan Term);
- Early Repayments - at any time without penalty;

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- Security – 1st mortgage with a maximum ‘loan to value ratio’ (LVR) of 80%

Fees and charges apply.

Customers for whom the product is likely to be suitable (**Target Market**)

Resolve Home Loans considers that the Resolve Home Loans Nil End Debt Home Loan will suit borrowers who want a loan to fund the purchase and construction of an owner-occupied residential property or residential investment property through the ABN Group but want the flexibility of interest being capitalised until the Existing Property is sold.

Borrowers must have signed a contract for a house and land package with the ABN Group, and the Resolve Home Loans Nil End Debt Home Loan must be able to be repaid in full out of the proceeds of sale of the Existing Property.

Customers within the Target Market will:

- be 18 years or over; and
 - be an Australian citizen or resident;
 - not have been bankrupt in the past seven years;
 - be able to demonstrate a good credit history over the past 5 years;
 - can meet Resolve Home Loan’s credit criteria;
 - want to capitalise the interest for the term of the loan; and
 - be able to provide security that does not exceed the maximum LVR.
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Ineligible consumers

The Resolve Home Loans Nil End Debt Home Loan is not appropriate for customers who:

- are under 18 years old;
 - do not meet Resolve Home Loan’s credit criteria;
 - would be unable to repay the loan out of the proceeds of sale of the Existing Property; or
 - are unable to provide Resolve Home Loans with 1st mortgage security
 - have defined goals and objectives that are not met by this product.
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Resolve Home Loans considers that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the Target Market because:

- applicants will only be approved for the purposes set out above; and
- applications will only be approved if the customer meets Resolve Home Loan’s credit assessment criteria (including the maximum LVR condition).

Distribution Conditions

Conditions and restrictions on distribution of the product

The Resolve Home Loans Nil End Debt Home Loan is subject to the following distribution conditions and restrictions:

The Resolve Home Loans Nil End Debt Home Loan may only be distributed:

- by the customer calling or visiting the Resolve Home Loans office; or
 - through Resolve Finance (**Distributor**), acting in accordance with Resolve Home loan’s distribution requirements.
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Resolve Home Loans considers that its Distribution Conditions are appropriate and likely to result in the product being distributed to the Target Market, because:

- Resolve Home Loans has:
 - a direct employment relationship with staff taking calls or assisting customer who attend our office; and
 - closely monitors its approved Distributors;
- all of our Distributors are appropriately trained to discuss the features of the product with customers; and
- our Distributors understand that applications will not be approved unless they meet:
 - the loan purpose; and
 - Resolve Home Loan's credit assessment and maximum LVR criteria.

Review Triggers

Circumstances which will result in the product being reviewed

Resolve Home Loans will review this TMD in the following circumstances.

- we receive a significant number of complaints in relation to the product
 - we identify a material adverse customer experience in relation to product appropriateness
 - there is a material change to the product's key attributes or the manner of distribution
 - there is a pattern of 'significant dealings' in the product which are inconsistent with the Target Market;
 - ASIC orders that the distribution of the product cease, or ASIC or AFCA raise concerns about the design and distribution of the product; and
 - any other event or circumstance that Resolve Home Loans considers mean that it is appropriate for the TMD to be reviewed.
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Review Trigger Reporting Requirements

Distributors must advise Resolve Home Loans of the following matters within the timeframes specified.

Product complaint data

Information relating to complaints received about the product or the distribution of the product, including:

- number of complaints,
- the identifier of the distributor;
- the product name; and
- the exact details of the complaint.

- Complaints about the distribution of the product
 - quarterly, within 10 business of the end of each March, June, September and December.
 - Complaints about the product itself:
 - within three business days of becoming aware of the complaint.
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Significant dealings

Any significant dealing of the product outside the Target Market

As soon as practicable but no later than 10 business days after the

		Distributor becomes aware of the significant dealing.
Feedback	Any feedback received about the product or the Distribution Conditions for the product.	As soon as possible, but no later than within 20 business days of the receiving the feedback

Record Keeping

Resolve Home Loans and its Distributors will keep records of the reasonable steps they have taken to ensure that this product is sold in a manner consistent with this TMD.

We will also keep complete and accurate records of

- all versions of the TMD for this product; and
- our decisions, and the reasons for those decisions about:
 - the determination of the TMD for this product;
 - the identification and tracking of review triggers;
 - the setting of review periods, and
 - all other the matters documented in this TMD.