

# Target Market Determination

## Judo Home Loans

This document is Judo Bank Pty Ltd’s (ABN 11 615 995 581, Australian Credit Licence (*ACL*) and Australian Financial Services Licence 501 091) (*Judo*) target market determination (*TMD*) for its home loan product (*Product*) that is only available and offered to certain eligible ‘consumers’ within the meaning of the *National Consumer Credit Protection Act 2009* (Cth) (*NCCPA*) and associated regulations.

The Product is subject to the design and distribution requirements relating to financial products for retail clients in Pt 7.8A of the *Corporations Act 2001* (Cth) (*Corporations Act*) and associated regulations, and this TMD has been prepared in accordance with those requirements.

In relation to Products which are provided by Judo direct to consumers who fall within the target market (see below), Judo is both the issuer and the distributor of them.

For Products which are provided to consumers who fall within the target market (see below) through Judo’s accredited broker network, Judo is the issuer only. The relevant broker, which holds its own ACL or is an authorised representative of an ACL holder, is the distributor.

This TMD is only relevant for the class of consumers described immediately below who are also ‘retail clients’ within the meaning of the *Corporations Act*. You should seek independent advice if you are unsure whether you fall within Judo’s target market or if this TMD is relevant to you.

If you have any questions regarding this TMD, please contact Judo on 13JUDO or your Relationship Banker or Broker (as applicable).

### Class of consumers that comprise Judo’s target market

#### Customer types

The Product can only be offered to the following eligible class of ‘consumer’ within the meaning of the NCCPA, namely:

- ‘consumers’ within the meaning of the NCCPA who are natural persons (such as a shareholder, trustee, partner or officer) that are associated with a new or an existing SME customer of Judo’s;
- a ‘consumer’ who is a strata corporation within the meaning of the NCCPA with new or existing SME lending with Judo;
- ‘consumers’ within the meaning of the NCCPA who are natural person permanent employees (whether full-time or part-time) or former permanent employees of Judo,

(hereafter, *Consumer*).

#### Customer objectives, financial situation and needs

Judo’s Product would suit or be appropriate for Consumers who:

- are looking for a simple, low-fee, fixed and/or variable interest rate home loan product (on a ‘principal and interest’ and/or ‘interest-only’ basis, as tailored by the customer to their individual circumstances) to complement associated new or existing SME lending with Judo; or
- are permanent employees or former permanent employees of Judo who require a simple, low-fee, fixed and/or variable interest rate home loan product (on a ‘principal and interest’ and/or ‘interest-only’ basis, as tailored by the customer to their individual circumstances).

Judo's Product would suit or be appropriate for Consumers who are seeking a home loan with a maximum loan term of 30 years, as tailored by the customer to their individual circumstances.

Judo's Product would not suit or be appropriate for consumers who do not meet the above criteria, or who are seeking lending for a purpose that is not a National Credit Code purpose, including a business purpose.

## Distribution conditions and restrictions

### Distribution channels

Judo's Product is distributed in only two ways:

- by Judo, where the Consumer is associated with a new or existing SME lending customer of Judo's, is a current or former permanent employee, or is a new or existing strata corporation customer of Judo's with associated SME lending. In this situation, Judo is both the issuer and the distributor as the distribution channel is Judo's own banker network; or
- via an accredited mortgage broker of Judo, which holds its own ACL or is an authorised representative of an ACL holder. In this situation, Judo is the issuer of the Product only. The relevant broker would be the distributor.

### Distribution conditions and restrictions

Broadly, other key conditions and restrictions on Judo's distribution of the Product include that:

- a Product will only be issued to a Consumer subject to satisfactory identity verification under applicable laws, including the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth);
- a Product will only be issued to Consumers who are 18 years or older (if applicable) and Australian resident or domiciled for tax purposes;
- a Product will only be issued to Consumers who meet Judo's suitability and eligibility requirements for the Product; and
- no Product will be issued for a purpose that is not a National Credit Code purpose, including a business purpose.

The above distribution channels and distribution conditions and restrictions, and this TMD generally, are intended to ensure that Consumers who acquire the Product are likely to be in the target market discussed above and that the Product would likely be consistent with the likely objectives, financial situation and needs of the Consumer that acquires it.

## Review of TMD

### Review triggers

Judo's Product offering will be reviewed if:

- no Consumer enters into a Product with Judo during a continuous 24-month period;
- we receive a significant number of 'retail client' complaints about the Product that indicate it is no longer suitable for the above target market; or
- a significant dealing<sup>1</sup> occurs which is inconsistent with this TMD.

<sup>1</sup> A 'significant dealing' will be determined by Judo considering factors such as: out of the consumers who acquire the Product, the proportion who are not in the target market; or the actual or potential harm to consumers, including the amount of any financial loss, resulting from consumers who are not in the target market acquiring the Product.

**Review period** In addition to conducting reviews in response to the review triggers outlined above, given the highly regulated nature of the Product and its specific target market, Judo will conduct the first review of this TMD within 12 months of the date of this TMD, with periodic reviews of the TMD on an annual basis thereafter.

**Information that must be reported by distributors**

Judo requires any Judo-accredited broker or Relationship Banker that distributes the Product to provide Judo with the following information within the timeframes specified below:

Information	Timeframe
Complaints from Consumers who must also be 'retail clients'.	<ul style="list-style-type: none"> <li>Where Judo is the distributor, complaints will be logged and dealt with in accordance with our complaints handling mechanism.</li> <li>Where the broker is the distributor, the relevant broker is required to advise Judo within five Business Days of receipt of the complaint so that the complaint can be dealt with in accordance with our complaints handling mechanism.</li> </ul>
Number of Consumers that have opened a Product through the broker or Judo Relationship Banker.	Only if Judo does not already have this information, within 10 business days of the end of each quarter commencing from December 2021.
The steps the distributor has taken to ensure that its distribution of the Product is consistent with the TMD.	A written acknowledgement by the distributor that the Consumer is likely to be in the target market for the Product and it would likely be consistent with their likely objectives, financial situation and needs, which is made by the distributor on or around the time the Consumer completes the application form for the Product.
A significant dealing occurs which is inconsistent with this TMD (e.g. a cluster of dealings that are not consistent with this TMD).	In writing as soon as practicable, and in any event within 10 business days after becoming aware.

**Disclaimer**

All information in this TMD is of a general nature only and does not take into account your individual objectives, financial situation or specific needs. You should consider how the information in this TMD meets your needs before deciding to apply for a Judo Product. In particular, you should seek independent financial advice and read the relevant terms and conditions and relevant Product documents prior to making a decision. Past performance is not an indication of future performance. Eligibility criteria, fees and charges and terms and conditions apply to the Product

If you received this TMD electronically you can obtain, free of charge, a paper copy of this TMD by contacting us at 13 JUDO.