

# Target Market Determination

## For Sandhurst Trustees Commercial Line of Credit (Variable Rate)

STL-COMM-LOC-V

### Product

This target market determination (TMD) applies to Sandhurst Trustees Commercial Line of Credit (Variable Rate).

### Issuer

Sandhurst Trustees Limited ABN 16 004 030 737 AFSL 237906 (Sandhurst) is a wholly owned subsidiary of Bendigo and Adelaide Bank Limited ABN 11 068 049 178 AFSL/ACL 237879 (Bendigo Bank). Sandhurst is making this product available as the responsible entity of the Sandhurst Select Mortgage Fund or the Sandhurst Investment Term Fund.

### Date from which this target market determination is effective

5 October 2021.

## 1. Target market for this product

### Target Market

This TMD only concerns one type of borrower who might require this product, i.e. borrowers who are 'retail clients' within the meaning of the Design and Distribution Obligations (DDO) legislation. For the avoidance of doubt, this document does not apply to and may be ignored in respect of other types of borrowers who are not 'retail clients' for the purpose of the DDO legislation, such as borrowers who require credit for business purposes.

The retail clients to whom the DDO legislation applies and for whom this product has been designed, include:

- Individuals who require credit of more than \$5 million, wholly or predominantly to:
  - purchase, renovate or improve more than one residential investment property;
  - refinance credit provided to them to purchase, renovate or improve more than one residential investment property; and
- Individuals who require credit to finance or refinance the acquisition, renovation or improvement of other types of real property (other than residential real property);
- Certain types of small businesses (specifically, companies, partnerships and trusts) who require a real property loan,

who in each case:

- do not propose to use the loan wholly or predominantly for business purposes;
- want a term loan wholly or predominantly to finance or refinance the acquisition of an investment property;
- want to make repayments of interest only with the option to repay the principal balance as well;
- want flexibility to make additional repayments and have access to these early additional repayments;
- can afford the loan;
- can provide unencumbered real property as security for the loan; and
- appreciate that if referred to Sandhurst by a third party, will primarily be dealing with Sandhurst through that third party.

The retail clients for whom this product has not been designed are individuals or strata corporations who:

- require credit wholly or predominantly for personal, domestic or household purposes;
- require credit of \$5 million or less, wholly or predominantly to purchase, renovate or improve a residential property for investment purposes;
- require credit of \$5 million or less, wholly or predominantly to refinance credit that had been provided to them to purchase, renovate or improve a residential property for investment purposes.

## Product Description

Sandhurst Trustees Commercial Line of Credit (Variable Rate) is a variable rate loan line of credit facility. It may be used to finance or refinance, wholly or predominantly, the acquisition, renovation or improvement of real property for an investment purpose. Regular interest only repayments are required, and the facility must remain within the approved limit. The line of credit facility allows additional payments at any time without penalty and ability to access those additional repayments (in amounts of \$2,000 or greater).

## Product key attributes

The key attributes of this product that make it likely to be consistent with the target market described above, include:

Attribute	Appropriate for
Line of Credit	Retail clients that want funding on flexible line of credit terms,
Minimum Loan Amount	Retail clients who generally want to borrow a minimum amount of \$100,000
Property Investment	<p>Retail clients looking to finance or refinance the acquisition of real property (excluding individuals who are outside the target market, e.g. individuals who wish to use the loan for a personal purpose, such as buying a property to live in). Additional cash out is permitted for approved purposes within credit policy.</p> <p>This product is not suitable for National Credit Code regulated facilities.</p>
Suitable applicants	<p>Suitable applicants include retail clients who are:</p> <ul style="list-style-type: none"> <li>• Individuals within the target market described above</li> <li>• Partnerships</li> <li>• Companies</li> <li>• Trusts</li> </ul> <p>Strictly for lending that is not regulated by the National Credit Code. For the purchase or approved renovation of or re-finance of debt relating to investment in real property where a first registered mortgage is offered as security for the said facility.</p>
Variable interest rate	A variable interest rate means the interest rate may increase or decrease over the term of the facility. This product may not be suitable for retail clients who require certainty around repayments by having a fixed interest rate.
Early repayments and redraw	Retail clients who want the flexibility to make additional repayments without incurring early repayment fees, and the ability to access those additional repayments.
Security over real property	All facilities must be secured by a first mortgage against real property security, within the maximum prescribed Loan to Valuation limits.

## 2. How this product is to be distributed

Sandhurst applies certain conditions and restrictions to the distribution of this product so that distribution is likely to be to retail clients within the target market for this product. The conditions and restrictions are:

<b>Channel</b>	<p>This product is to be distributed only through the following channels:</p> <ul style="list-style-type: none"><li>• By Sandhurst accredited mortgage brokers or aggregators</li><li>• Bendigo Bank and Community Bank branches;</li><li>• Bendigo Bank's Mobile Relationship Managers; and</li><li>• Bendigo Bank's Business Bankers.</li></ul>
<b>Additional conditions or restrictions</b>	<p>The following additional conditions and restrictions also apply to the distribution of this product:</p> <ul style="list-style-type: none"><li>• Sandhurst will not lend for transactions governed by the National Credit Code.</li><li>• Only prospective retail clients who meet Sandhurst's minimum eligibility criteria for the product should submit an application for this product; and</li><li>• This product can only be issued (or arranged to be issued) by persons who are appropriately trained and accredited.</li></ul>

## 3. Reviewing this target market determination

Sandhurst will review this TMD as set out below:

<b>Initial review</b>	Within the first year of the effective date.
<b>Periodic reviews</b>	At least every 12 months from the initial review.
<b>Review triggers or events</b>	<p>Any event or circumstances arising that would reasonably suggest the TMD is no longer appropriate. This may include (but is not limited to):</p> <ul style="list-style-type: none"><li>• a material change to the design or distribution of the product, including related documentation;</li><li>• occurrence of a significant dealing;</li><li>• distribution conditions found to be inadequate in ensuring that the product is issued to retail clients who are likely to be in the target market;</li><li>• relevant changes in the law or its application, a change in an industry code or decision of a court or other body (including through regulatory guidance) that materially affects the product;</li><li>• significant changes in metrics, including, but not limited to:<ul style="list-style-type: none"><li>○ a material increase in the number of complaints in relation to a product or aspect of a product;</li><li>○ the level of consumers experiencing hardship such as falling into arrears; and</li><li>○ an increase in early termination of the product; and</li><li>○ any other event occurs, or information is received that reasonably suggests this TMD is no longer appropriate.</li></ul></li></ul>

## 4. Reporting and monitoring this target market determination

Sandhurst third-party distributors who are regulated persons will need to collect, keep and report the following information to Sandhurst:

Type	Description of information	Frequency of reporting
<b>Complaints</b>	Customer complaints made in relation to this product. This includes: <ul style="list-style-type: none"><li>written details of the complaint; and</li><li>the number of complaints during the reporting period.</li></ul>	<b>Reporting period:</b> Monthly <b>When does the regulated person have to report:</b> Within 10 business days of the end of the reporting period
<b>Sales data</b>	Sales and customer data in relation to this product as requested by Sandhurst.	If sales and customer data is requested by Sandhurst: <b>Reporting period:</b> Monthly <b>When does the regulated person have to report:</b> Within 10 business days of the end of the reporting period.
<b>Significant dealings</b>	The following information: <ul style="list-style-type: none"><li>details of the significant dealing;</li><li>the date (or range) on which the significant dealing occurred;</li><li>why the distributor considers the dealing to be significant (including why it is inconsistent with this TMD); and</li><li>how the dealing was identified.</li></ul>	<b>When does the regulated person have to report:</b> Within 10 business days of the distributor becoming aware of the dealing.

