

Target Market Determination

This Target Market Determination (**TMD**) has been prepared in accordance with the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019* and associated Regulations. TMDs are designed to assist issuers to ensure that financial products they issue are likely to be consistent with the *likely objectives, financial situation and needs* of the consumers for whom they are intended (the target market) and to assist distributors to ensure that financial products are distributed to the target market.

The TMD is general in nature and should not be construed as financial advice. Consumers should obtain independent advice prior to acquiring the Products to ensure that it is appropriate for their particular *objectives, financial situation and needs*.

1. Products

Prime Residential Loan (Full Doc only) (**Prime**)

Near Prime Residential Loan (Full Doc & Alt Doc) (**Near Prime**)

Specialist Residential Loan (Full Doc & Alt Doc) (**Specialist**)

Specialist + Residential Loan (Full Doc only) (**Specialist +**)

(together, **the Products**).

For the purpose of this TMD, 'Full Doc' refers to consumers that provide comprehensive documentation (ie 'full documentation') to verify their financial status and ability repay the loan. 'Alt Doc' refers to documentation that caters for a wider variety of financial circumstances (ie 'alternative documentation') to verify financial status and ability to repay.

2. Reference Documents for the Products

Home Loan Terms and Conditions and Credit Guide

3. Issuer of the Products

Issuer: Crucis Pty. Ltd. ABN 45 102 849 776 Australian Credit Licence 387666

Manager: Victorian Mortgage Group Pty Ltd ABN 42 006 110 998 Credit Rep no. Credit Representative Number 398125

4. Date of TMD

28 February 2025

5. Description of target market, including likely objectives, financial situation and needs

The features of the Products have been assessed as meeting the *likely objectives, financial situation and needs* of consumers who:

- meet the eligibility criteria, including:
 - are individuals (including trustee of a discretionary, fixed or unit trust) 18 years of age or above and are an Australian resident or citizen; or
 - are an Australian registered company; or
 - are a trustee of an Australian discretionary, fixed or unit trust; and
- have the objectives, financial situation and needs set out in the table below.

Prime	Near Prime (Full Doc)	Near Prime (Alt Doc)	Specialist (Full Doc)	Specialist (Alt Doc)	Specialist +
<p>The consumer:</p> <ul style="list-style-type: none"> • requires finance to purchase, refinance or construct an owner occupied or investment residential property, or any other worthwhile purpose; • may be self-employed and require more flexibility in demonstrating their income; • requires the option of consolidating debts; • requires the flexibility of a variable interest rate; • requires the ability to make unlimited extra repayments and access redraw; 	<p>The consumer:</p> <ul style="list-style-type: none"> • requires finance to purchase an owner-occupied or investment residential property, refinance, or construction of a residential property or any other worthwhile purpose; • may be self-employed and require more flexibility in demonstrating their income; • requires the option of consolidating debts; • requires the flexibility of a variable interest rate; • requires the ability to make unlimited extra 	<p>The consumer:</p> <ul style="list-style-type: none"> • requires finance to purchase an owner-occupied or investment residential property, refinance, or any other worthwhile purpose; • may be self-employed and require more flexibility in demonstrating their income. • requires the option of consolidating debts; • requires the flexibility of a variable interest rate; • requires the ability to make unlimited extra repayments and access redraw; 	<p>The consumer:</p> <ul style="list-style-type: none"> • requires finance to purchase an owner-occupied or investment residential property, refinance, or construction of a residential property or any other worthwhile purpose; • may be self-employed and require more flexibility in demonstrating their income; • requires the option of consolidating debts; • requires the flexibility of a variable interest rate; • requires the ability to make unlimited extra 	<p>The consumer:</p> <ul style="list-style-type: none"> • requires finance to purchase an owner-occupied or investment residential property, refinance, or any other worthwhile purpose; • may be self-employed and require more flexibility in demonstrating their income; • requires the option of consolidating debts; • requires the flexibility of a variable interest rate; • requires the ability to make unlimited extra repayments and access redraw; 	<p>The consumer:</p> <ul style="list-style-type: none"> • requires finance to purchase an owner-occupied or investment residential property, refinance, or construction of a residential property or any other worthwhile purpose; • may be self-employed and require more flexibility in demonstrating their income; • requires the option of consolidating debts; • requires the flexibility of a variable interest rate; • requires the ability to make unlimited extra

<ul style="list-style-type: none"> requires a faster turn-around time; and requires the option of either principal and interest or interest only repayments. 	<p>repayments and access redraw;</p> <ul style="list-style-type: none"> requires the option of either principal and interest or interest only repayments; and may have minor credit impairments. 	<ul style="list-style-type: none"> requires the option of either principal and interest or interest only repayments; is not seeking to secure a loan using vacant land as security; and may have minor credit impairments. 	<p>repayments and access redraw;</p> <ul style="list-style-type: none"> requires the option of either principal and interest or interest only repayments; may have minor credit impairments; and may be a discharged bankrupt. 	<ul style="list-style-type: none"> requires the option of either principal and interest or interest only repayments; is not seeking to secure a loan using vacant land as security; may have minor credit impairments; and may be a discharged bankrupt. 	<p>repayments and access redraw;</p> <ul style="list-style-type: none"> requires the option of either principal and interest or interest only repayments; and may have credit impairments.
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Whilst variable interest rates may fluctuate, the Products meet the likely objectives, financial situation and needs of consumers in the target market (set out above) because it allows them to make additional repayments to reduce interest payable whilst retaining the ability to draw on those funds when required.

Owner Occupied Residential Property

Prime, Near Prime (Full Doc), Specialist (Full Doc) and Specialist + allow consumers to finance the purchase, refinance existing loans or construction of an owner-occupied residential property with the ability to select principal and interest repayments (construction excluded) in order to reduce the overall debt and build equity or interest only repayments to minimise repayments.

Near Prime (Alt Doc) and Specialist (Alt Doc) allow consumers to finance the purchase or refinance existing loans of an owner-occupied residential property with the ability to select principal and interest repayments in order to reduce the overall debt and build equity or interest only repayments to minimise repayments.

Investment Residential Property

Prime, Near Prime (Full Doc), Specialist (Full Doc) and Specialist + allow consumers to finance the purchase, refinance existing loans or construction of an investment property with the ability to select principal and interest repayments (construction excluded) in order to reduce the overall debt and build equity or interest only repayments for tax purposes.

Near Prime (Alt Doc) and Specialist (Alt Doc) allow consumers to finance the purchase or refinance existing loans of an investment property with the ability to select principal and interest repayments in order to reduce the overall debt and build equity or interest only repayments for tax purposes.

6. Product Key Attributes

Near Prime (Alt Doc)	Specialist (Alt Doc)	Prime	Near Prime (Full Doc)	Specialist (Full Doc)	Specialist +
<ul style="list-style-type: none"> Variable interest rate. Redraw is available. Minimum loan amount \$100,000. Loan amount \$2,000,000 (which may be increased to a maximum of \$3,000,000 at our discretion). Maximum loan term 30 years. Maximum Loan to Valuation Ratio (LVR): 80%. Repayment options: <ul style="list-style-type: none"> principal and interest and interest only for Owner Occupied. principal and interest and interest only for Investment. Repayment frequency – weekly, fortnightly, or monthly. Risk premium fee is payable. Valuation fee is payable. Solicitor fee is payable. 			<ul style="list-style-type: none"> Variable interest rate. Redraw is available. Minimum loan amount \$100,000. Maximum loan amount \$3,000,000. Maximum loan term 30 years. Maximum Loan to Valuation Ratio (LVR): 80%. Repayment options: <ul style="list-style-type: none"> principal and interest and interest only for Owner Occupied. principal and interest and interest only for Investment. interest only for construction. Repayment frequency – weekly, fortnightly, or monthly. Risk premium fee is payable. Valuation fee is payable. Solicitor fee is payable. 		

7. Classes of consumers for who the Products may not be suitable

Prime	Near Prime (Full Doc & Alt Doc)	Specialist (Full Doc & Alt Doc)	Specialist +
<p>The Prime product may not be suitable for consumers who:</p> <ul style="list-style-type: none"> do not meet the eligibility requirements; have less than a 20% deposit; are providing commercial property as security; are seeking lenders mortgage insurance; 	<p>The Near Prime (Full Doc & Alt Doc), Specialist (Full Doc & Alt Doc) and Specialist + products may not be suitable for consumers who:</p> <ul style="list-style-type: none"> do not meet the eligibility requirements; have less than a 20% deposit; are providing a commercial property as security; are seeking lenders mortgage insurance; are seeking the certainty of fixed repayments over the term of the loan; 		

<ul style="list-style-type: none"> • are seeking the certainty of fixed repayments over the term of the loan; • are seeking a short-term funding solution; • require an offset account; and • have excellent credit history with strong stability in employment and can obtain a comparable loan at a lower interest rate. 	<ul style="list-style-type: none"> • are seeking a short-term funding solution; and • require an offset account.
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8. Distribution conditions

The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the Products to the target market:

Channel	Conditions
Direct – by phone	Only authorised staff are permitted to assist consumers with the Products. Authorised staff have the necessary training, skills, and knowledge to assess whether the consumer is within the target market.
Third party – Accredited mortgage brokers subject to Best Interests Duty (BID) and related obligations	All applications submitted by accredited mortgage brokers must comply with our policies and procedures issued to accredited brokers from time to time. Accredited mortgage brokers are subject to a higher duty under BID to ensure that the relevant product is in the best interests of the particular consumer.

The distribution channels and conditions are appropriate because:

- the Products have a wide target market;
- our distributors have been adequately trained to understand their DDO obligations;
- we rely on existing distributors, methods, controls, and supervision already in place;
- our approval system has controls in place to flag applicants who may be outside the target market; and
- accredited mortgage brokers are subject to a higher duty under BID to ensure that the relevant product is in the best interests of the particular consumer.

9. Review Triggers

The following review triggers would reasonably suggest that the TMD may no longer be appropriate:

- A significant dealing of the Products to consumers outside the target market occurs.
- Complaints are received from more than 10% of our customers in relation to the Products in a calendar month.
- More than 5% of our customers default in relation to the Products in a calendar month.
- Applications for hardship are received from more than 10% of our customers in relation to the Products in a calendar month.
- There is a material change to the Products or the terms and conditions of the Products which may suggest that the TMD may no longer be appropriate.

10. Review Periods

First review date:

- **Prime:** 28 February 2025
- **Near Prime:** 28 February 2025
- **Specialist:** 28 February 2025
- **Specialist +:** 28 February 2025

Periodic reviews: every 12 months, after the initial and each subsequent review.

Trigger reviews: review to be completed within 10 business days of the identification of a trigger event.

11. Distribution Information Reporting Requirements

The following information must be provided to the Issuer by distributors who engage in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
Specific Complaints	Details of the complaint, including name and contact details of complainant and substance of the complaint.	As soon as practicable and within 10 business days of receipt of complaint.
Complaints	Number of complaints and general feedback relating to the product and its performance	Every 6 months
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