

**Issue Date: 4 October 2024**

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**Act**). It describes the class of consumers that comprises the target market for the Loan Product and matters relevant to the Loan Product’s distribution and review (specifically distribution conditions, triggers to review the target market and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the Loan Product being consistent with the most recent TMD (unless the distribution is excluded conduct). It forms part of La Trobe Financial’s design and distribution arrangements for the Loan Product.

This document is not a summary of the product features or terms of the Loan Product. This document does not take into account any person’s individual objectives, financial situation or needs. Consumers interested in acquiring this Loan Product should carefully read the Letter of Offer (loan agreement) and other loan documents issued to them before deciding whether to proceed.

### 1. Product Description

Loan Products	La Trobe Financial Development Finance as follows: <ul style="list-style-type: none"> <li>• Development Finance (Full Doc &amp; Lite Doc<sup>®</sup>);</li> <li>• Islamic Finance Development Finance (Full Doc &amp; Lite Doc<sup>®</sup>) (a <b>finance facility</b>, not a “loan”).</li> </ul>
Issuer	Perpetual Corporate Trust Limited as trustee for, or custodian of, a trust or managed investment scheme.
La Trobe Financial	La Trobe Financial Services Pty Limited (ABN 30 006 479 527) is the Issuer’s representative.
TMD Version	4.0

### 2. Description of target market for the Loan Product

The Consumer Attributes column in the table below indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering the Loan Product.

Category	Consumer Attributes
Consumer Type	<p><b>Full Doc Loan</b></p> <p>Suitable for consumers (individuals over the age of 18) who are:</p> <ul style="list-style-type: none"> <li>• Employed (PAYG);</li> <li>• Self-employed;</li> <li>• Self-funded retirees; and/or</li> <li>• Pensioners and who are able to provide verification of taxable income (eg payslips or tax returns).</li> </ul> <p>Suitable also for partnerships, companies and trustees able to provide verification of taxable income through financial statements or tax returns.</p> <p><b>Lite Doc<sup>®</sup> Loan</b></p> <p>Suitable for consumers (individuals over the age of 18) who are self-employed and who prefer not to provide tax returns and instead verify their income with alternative methods such as an accountant’s certificate, Business Activity Statements (<b>BAS</b>) or trading statements.</p> <p>Suitable also for partnerships, companies and trustees who prefer to verify their income with alternative methods such as an accountant’s certificate, BAS or trading statements.</p> <p>Borrowers may not be assessed under Full Doc or Lite Doc<sup>®</sup> Loan requirements if the total debt is intended to be repaid at or prior to loan maturity through a sale of some or all of the developed properties (refer “development for profit” below).</p> <p><b>Islamic Finance</b></p> <p>For the Islamic Finance Development finance facility specifically, it is suitable for consumers of Islamic faith seeking a Shariah compliant Full Doc, Lite Doc<sup>®</sup> or development for profit finance facility as outlined above.</p>

Category	Consumer Attributes
<b>Likely Objectives and Needs</b>	<p>The Loan Product is likely to be suitable for consumers seeking the following:</p> <ul style="list-style-type: none"> <li>• a term loan secured by a registered mortgage over commercial property;</li> <li>• ability to choose between a variable interest rate (with rate fluctuations) or a fixed rate;</li> <li>• an interest budget to be included in the loan amount to fund interest repayments during the loan term (including the development period);</li> <li>• the product is designed for consumers looking to construct a residential (generally multi-unit) development or commercial development to live in and/or to use as an investment and/or sell for profit.</li> </ul> <p>In respect of Islamic Finance finance facilities, consumers seeking a product which is Shariah compliant.</p> <p><b>Interest Only/Rental Facility Fee Only Periods</b></p> <p>This product allows an interest budget during the term of the loan (including the development period).</p> <p>In respect of Islamic Finance finance facilities, a rental facility fee only period may be allowed for a period of time, subject to a lending assessment and criteria.</p> <p><b>Development for profit</b></p> <p>The purpose for which consumers with the above objectives and needs may seek to obtain this product is, typically, to construct a multi dwelling residential or commercial property or for profit.</p>
<b>Likely Financial Situation</b>	<p>Suitable for consumers whose financial situation provides sufficient resources to complete a development for profit and/or have access to income to satisfactorily meet long term repayment obligations (subject to La Trobe Financial's credit assessment) should they wish to retain some or all of the completed development for owner occupied or investment use.</p> <p>The borrower must be able to fund an agreed upfront component of the costs of development (including the purchase price of the property) from their own equity.</p>

### 3. Consistency of Loan Product's features with consumer attributes of Target Market

La Trobe Financial has assessed the Loan Product and formed the view that the Loan Product, including its key attributes summarised below, is likely to be consistent with the likely objectives, financial situations and needs of consumers in the target market, as the features of this Loan Product, including its key attributes, summarised below are likely to be suitable for consumers with the attributes summarised in Section 2 above.

Key attributes	Features	Suitable for Consumers within the Target Market
<b>Acceptable security</b>	Residential or commercial property within Australia that is able to be secured by registered mortgage.	<p>This product is likely to be suitable for consumers typically looking to construct a residential (generally multi-unit) development with the option to live in one of the developed units and/or to use some or all of the developed dwellings as an investment. Alternatively the consumer may seek to undertake a commercial property development either for investment purposes or to sell the development for profit.</p> <p>The consumer must be able to provide residential or commercial property security to secure the loan.</p>
<b>Maximum LVR</b>	The maximum LVR is met in accordance with the requirements notified by the Issuer from time to time.	Each Loan Product is likely to be suitable for consumers seeking a loan within the LVR limits listed for each Loan Product.
<b>Loan term</b>	Up to 2 years.	This product is likely to be suitable for consumers looking to construct their development during a period of up to 2 years.
<b>Loan amount</b>	The loan amount meets the stated minimum and maximum loan amount requirements notified by the Issuer from time to time.	Each Loan Product is likely to be suitable for consumers seeking a loan within the loan amounts listed for each Loan Product.
<b>Repayment type</b>	Interest only for an agreed duration covering the development period. An interest budget is typically included in the approved loan amount.	This product is likely to be suitable for consumers looking to pay interest only to be funded during the loan term (including the development period). An interest budget can be included in the loan amount to cover estimated interest payments during the development period at the borrower's option.
<b>Payment Type – Islamic Finance Facilities</b>	Rental facility fee only payments for an agreed duration covering the development period. A rental facility fee budget is typically included in the approved loan amount.	The payment type is likely to be suitable for consumers looking to pay rental facility fees only for a period of time to free up cashflow by not having to pay down capital for a period of time.

Key attributes	Features	Suitable for Consumers within the Target Market
<b>Interest rate</b>	Variable or fixed.	<p>This product is likely to be suitable for consumers either looking for rate fluctuations through variable rates or for consumers looking for a fixed rate. A variable interest rate means the applicable interest rate can increase or decrease during the loan term.</p> <p>This product is suitable for consumers willing to pay break costs in some circumstances, for example the early repayment of the loan via an external refinance of the debt where the loan has a fixed rate of interest.</p> <p>The Islamic Finance Development finance facility does not attract an interest rate, rather a rental facility fee is payable based on either a fixed or variable rental facility fee rate.</p>
<b>Progress payments</b>	Development funds are advanced progressively to fund construction on a “cost to complete” basis as advised by a valuer or quantity surveyor.	This product is likely to be suitable for consumers who are looking for the costs of a development to be advanced progressively as the development is completed (subject to valuer or quantity surveyor advice).

#### 4. Distributions conditions/restrictions

Distributors this condition applies to	Distribution conditions	Distribution conditions rationale
<b>Direct to Consumer</b>	<p>La Trobe Financial's distribution and sales and credit staff are required to be properly trained in DDO and undergo at least annual training.</p> <p>La Trobe Financial conducts a credit assessment on every loan application to ensure that the loan is capable of being serviced based on the consumer's stated financial situation. Only trained and accredited staff with the required delegated lending authority conduct each respective assessment and in accordance with the relevant laws and internal policies.</p>	<p>This distribution condition will make it more likely that La Trobe Financial's sales and credit staff will identify if a consumer is not within the target market.</p> <p>By virtue of this assessment, those consumers who enter into a credit contract for the product are highly likely to be in the class of consumers for which it has been designed.</p>
<b>Marketing</b>	No Loan Product marketing, advertising or promotional material may be sent or made available by La Trobe Financial unless La Trobe Financial has completed an external communications compliance checklist.	La Trobe Financial has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because distributors using this promotional material will not be promoting the Loan Product in a way that could misrepresent the Loan Product or likely direct marketing to potential consumers outside the target market.
<b>Third-Party Distribution</b>	<p><b>Legal Obligations</b></p> <p>All third-party distributors must meet all ongoing regulatory and disclosure obligations relating to their position in the market, including responsible lending obligations and best interests duty.</p> <p>Third-party distributors are required to hold an Australian Credit License or maintain an appointment as a credit representative authorised to engage in credit activities on behalf of a credit licensee.</p> <p>La Trobe Financial conducts a credit assessment on every loan application to ensure that the loan is capable of being serviced based on the consumer's stated financial situation. Only trained and accredited staff with the required delegated lending authority conduct each respective assessment and in accordance with the relevant laws and internal policies.</p>	<p><b>Legal Obligations</b></p> <p>In relation to aggregators and brokers, La Trobe Financial has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because the aggregator or broker has its own obligations as a distributor to take reasonable steps that will or are reasonably likely to result in retail product distribution conduct being consistent with this TMD.</p>

Distributors this condition applies to	Distribution conditions	Distribution conditions rationale
<b>Third-Party Distribution</b> <i>Continued from previous page.</i>	<p><b>Marketing, Advertising &amp; Promotion</b></p> <p>Third-party distributors may not use marketing, advertising or promotional materials that are inconsistent with La Trobe Financial's issued materials.</p> <p><b>Distribution Agreement</b></p> <p>Where a third-party distributor has entered into a distribution agreement with La Trobe Financial, each third-party distributor must meet on an ongoing basis La Trobe Financial's accreditation requirements and must comply with their respective distribution agreement.</p> <p><i>Islamic Finance distributors</i></p> <p>Islamic Finance distributors are required to review La Trobe Financial's finance facility documentation and obtain a Shariah Compliance Certificate (or similar appropriate sign off from a Shariah Board) prior to distribution of the Islamic Finance product. Other distribution conditions may apply.</p>	<p><b>Marketing, Advertising &amp; Promotion</b></p> <p>La Trobe Financial has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because distributors using promotional material will not be promoting the Loan Product in a way that could misrepresent the Loan Product or likely direct marketing to potential consumers outside the target market.</p> <p><b>Distribution Agreement</b></p> <p>La Trobe Financial has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because requiring distributors to comply with relevant conditions of distribution aims to reinforce to the distributor that the Issuer is committed to its compliance with the DDO regime.</p>

## 5. Reviewing this TMD

This TMD will be reviewed by La Trobe Financial on both:

- a scheduled basis with reviews to be completed before the end of the maximum period for review specified below; and
- where a Review Trigger (as defined below) has occurred.

### Mandatory TMD review periods

Reporting requirements	Maximum period for review
Initial review	Not applicable
Subsequent Review	4 January 2026, being 1 year and 3 months from the date of the previous TMD review.

**Note:** The review period allows for the collection of data for 12 months, plus three months for the completion of the review.

### Review Triggers

The events and circumstances described below (**Review Triggers**) will also require a review of this TMD:

- material change to the terms or attributes of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- where and when the Loan Product is not being distributed and purchased as envisaged by this TMD which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- reporting from distributors of one or more 'significant dealings', multiple distributors of 'significant dealing' (see section 6 below) of the Loan Product or numerous reports from one distributor of 'significant dealings' of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- determination by the Issuer of a 'significant dealing' (see section 6 below) of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the Loan Product or the distribution of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- a reportable situation (as defined in section 912D of the Act) has been reported in relation to the design or distribution of the Loan Product and which the Issuer reasonably considers indicates that the TMD may no longer be appropriate;
- regulatory inquiry by AFCA, ASIC or another regulatory authority as to the design or distribution of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate; and/or
- the use by ASIC or other regulators of Product Intervention Powers, regulatory orders or directions that affect the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate.

The above review triggers do not limit the Issuer's obligations under s994C(3)(ii) of the Act. When a review trigger has occurred, this TMD will be reviewed within 10 business days.

## 6. Reporting and monitoring this TMD

The following reporting requirements apply to all distributors of the Loan Product:

Reporting requirements	Reporting period
Where the distributor is aware or ought to reasonably be aware, it should report on each 'significant dealing' outside of the target market, under section 994F(6) of the Act (see guidance below) by completing the Notification of Significant Dealing Form and submitting it to: <a href="mailto:targetmarketdistribution@latrobefinancial.com.au">targetmarketdistribution@latrobefinancial.com.au</a> .	As soon as practicable but no later than 10 business days after the distributor becomes aware of the 'significant dealing'.
Distributors must report to La Trobe Financial (at <a href="mailto:targetmarketdistribution@latrobefinancial.com.au">targetmarketdistribution@latrobefinancial.com.au</a> ): <ul style="list-style-type: none"> <li>if required by law, whether the distributor received complaints in relation to the Loan Product during the reporting period;</li> <li>the number of complaints it received; and</li> <li>include, with its report, a copy of each complaint (as defined in section 994A(1) of the Act) (to the extent permitted under privacy and other laws), or where this is not possible, report on the content of each complaint.</li> </ul>	On a quarterly basis and for each quarter as soon as practicable but no later than 10 business days following the end of the quarter.

Section 994F(6) of the Act requires distributors to notify the Issuer if they become aware of a significant dealing of the Loan Product that is not consistent with the TMD. Neither the Act nor ASIC defines when a dealing is 'significant' and distributors have discretion to apply its ordinary meaning.

The Issuer will rely on notifications of significant dealings to monitor and review the Loan Product, this TMD, and its distribution strategy, and to meet its own obligation to report significant dealings to ASIC.

Dealings outside this TMD may be significant because:

- they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the Loan Product, or
- they constitute an individual transaction which has resulted in, or will or is likely to result in, significant detriment to the consumer (or class of consumer).

In determining whether a 'significant dealing' has occurred, La Trobe Financial expects that the following non-exhaustive list of factors may be relevant for distributors:

- the nature of the Loan Product; and/or
- whether a customer outside of the target market has acquired the Loan Product; and/or
- the extent to which the acquisition of the Loan Product by the customer outside of the target market has the potential to harm or has caused harm (including the amount of any financial loss); and/or
- the nature and extent to which the distribution of the Loan Product is inconsistent with the TMD.

The above list is not exhaustive and distributors should consider, having regard to the circumstances of their business, whether other factors or events may suggest that a significant dealing has occurred. A significant dealing may be identified through the distributor's product governance arrangements, as a result of a consumer complaint or the occurrence of a Review Trigger.

## 7. Contact Us

Please contact La Trobe Financial at [targetmarketdistribution@latrobefinancial.com.au](mailto:targetmarketdistribution@latrobefinancial.com.au) with any questions or feedback with respect to this TMD.

Historical versions of this TMD and the Notice of Significant Dealing Form are available at <https://latrobefinancial.com.au/loans/residential-solutions/tmd/>.

## 8. Disclaimer

Issued by La Trobe Financial Services Pty Limited ACN 006 479 527 Australian Credit Licence No. 392385. La Trobe Financial is the Issuer's representative of the Loan Product referred to in this TMD. Terms, conditions, fees, charges and La Trobe Financial lending criteria apply.