Pepper Money Visa Debit Card

Target Market Determination



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1. Target Market Determination - Pepper Money Visa Debit Card

The Visa debit card attached to your Pepper loan product (**Visa Debit Card**) is a financial product for the purposes of the design and distribution obligations set out in Part 7.8A of the *Corporations Act 2001* Cth).

The purpose of this Target Market Determination is to provide consumers information about the Visa Debit Card's key attributes, the target market for the card, and the distribution and monitoring arrangements between the issuer, Indue Limited and the distributor, Pepper Money Limited (ABN 55 094 317 665) (**Pepper Money**).

This document is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. You should refer to the Terms and Conditions of the Visa Debit Card available at

https://www.pepper.com.au/lending/help-centre/customer-service/visa-debit-cardassistance when making a decision about this product.

Date from which this Target Market Determination is effective

5 October 2021

2. Target Market

The information below summarises the overall class of consumers that fall within the target market for the Visa Debit Card, based on the product key attributes and the objectives, financial situation and needs that it has been designed to meet.

(a) Class of consumers that fall within the target market

The Visa Debit Card is for those who have an eligible loan product from Pepper Money and are looking for a way to access money from their home loan subset account.

(b) Description of the Visa Debit Card and its key attributes

The key attributes of the Visa Debit Card are that:

- It can be used to access money from a home loan subset account; and
- can be used at any merchant that accepts Visa.

Fees and charges apply. Please refer to the terms and conditions of the card at <u>https://www.pepper.com.au/lending/help-centre/customer-service/visa-debit-card-assistance</u>

(c) Excluded class of consumers

The Visa Debit Card has not been designed for anyone who does not have eligible loan product from Pepper Money.

(d) Consistency between target market and Likely objectives, financial situation and needs

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The Visa Debit Card is is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as:

- It can only be linked to an eligible loan product from Pepper Money;
- identification and verification checks are undertaken on the cardholder by Pepper Money; and
- the Visa Debit Card has controls in place to ensure it can only be used to purchase items up to a total value of \$5,000 per day.

3. Distribution Conditions and Restrictions

(a) Distribution channels

The Debit Card is designed to be distributed to consumers through the following means:

- Pepper Money accredited mortgage brokers subject to Best Interests Duty (Third Party Channel); and
- Directly via Pepper Money employees (Direct Channel).

(b) Distribution conditions and restrictions

The Debit Card should only be distributed to individuals who

- o have an eligible loan product from Pepper Money;
- successfully pass the identification and verification checks put in place by Pepper Money; and
- who have elected to link the Debit Card to their loan product.

(c) Adequacy of distribution conditions and restrictions

Given the requirement that the cardholder have an eligible loan product with Pepper Money and elect to link the Debit Card to the loan product, the distribution conditions and restrictions will make it likely that consumers who purchase the product are in the class of consumers for which it has been designed.

4. Reviewing this Target Market Determination

We will review this Target Market Determination in accordance with the below:

Initial review	Within 6 months of the effective date.
Periodic reviews	At least every 1 year from the initial review.
Review	Any event or circumstances arise that would suggest the
triggers or	Target Market Determination is no longer appropriate. This
events	may include (but not limited):
	 a material change to the design or distribution of the
	Visa Debit Cards, including related documentation;
	 occurrence of a significant dealing;

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- distribution conditions found to be inadequate;
- change in legal or regulatory requirements;
- external events such as adverse media coverage or regulatory attention; and
- significant changes in metrics, including, but not limited to, 10 complaints in any 6 month period.

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

5. Reporting and monitoring this Target Market Determination

We will collect the following information from our distributors in relation to this Target Market Determination:

Complaints	Distributors will report all complaints in relation to the product(s) covered by this Target Market Determination on a monthly basis. This will include written details of the complaints.
Significant dealings	Distributors will report if they become aware of a significant dealing in relation to this Target Market Determination within 10 business days.

Distributors should provide all reporting to ddoreporting@pepper.com.au