



# Target Market Determination

## NAB Equity Builder

Determination Criteria	Description
Start date	16/10/2021
First and ongoing review period	The first review, and each ongoing review, must be completed within each consecutive 12 month period from the Start Date.
Product	<b>NAB Equity Builder</b> A simple investment loan for the purchase of shares and investments using the shares and investments to secure the loan.

### Target Market

Target market & product attributes	Consumer needs and objectives	Product attributes
	<p>A person that wants a simple principal and interest (P&amp;I) loan to purchase shares and investments and use those shares and investments to secure the loan ensuring property assets are not required to secure the investment loan.</p> <p>An investor that wants credit to purchase investments, with embedded diversification such as exchange traded funds, listed investment companies and unlisted managed funds.</p>	<p>This loan provides the ability to use credit:</p> <ul style="list-style-type: none"> <li>for the purchase of financial assets including:               <ul style="list-style-type: none"> <li>managed funds</li> <li>exchange traded funds</li> <li>listed investment companies</li> <li>separately managed accounts.</li> </ul> </li> </ul>
	<p>A person that wants an investment loan from 3 years up to a maximum of 15 years.</p> <p>A person that wants an interest rate that varies with flexible repayment amounts and the flexibility to make extra repayments and save interest.</p> <p>A person that wants to minimise repayments for a defined period by only repaying interest costs where gearing is less than 30%.</p> <p>A person that wants flexibility to access and redraw extra repayments that have been made.</p>	<p>This investment loan provides credit for:</p> <ul style="list-style-type: none"> <li>A minimum term of 3 years</li> <li>A maximum term of 10 years or</li> <li>Up to 15 years where the gearing is less than 65%.</li> </ul> <p>This investment loan provides access to a variable interest rate option with:</p> <ul style="list-style-type: none"> <li>monthly principal and interest repayment</li> <li>monthly interest only repayment option where gearing is less than 30%</li> <li>flexibility of making extra repayments</li> </ul> <p>redraw of extra repayments.</p>
	<p><b>Consumer financial situation</b></p> <p>A person that:</p> <ul style="list-style-type: none"> <li>requires a minimum loan amount of \$20,000</li> </ul>	<p><b>Product attributes</b></p> <p>This facility requires minimum loan amount of \$20,000.</p>

	<ul style="list-style-type: none"> <li>requires a minimum draw down and purchase amount of \$10,000</li> <li>has access to assets greater than the requested credit limit</li> <li>has access to approved assets or cash to fund the minimum equity contribution.</li> </ul> <p>A person that has access to sufficient income to meet the following payments:</p> <ul style="list-style-type: none"> <li>principal amounts due</li> <li>interest amounts due.</li> </ul>	<p>This facility requires minimum payments including:</p> <ul style="list-style-type: none"> <li>principal amount</li> </ul> <p>interest repayments.</p>
<b>Negative target market statement</b>	Not suitable for a person requiring loan for non-investment purpose or investment through property.	
<b>Appropriateness statement</b>	NAB has considered that the product including its key attributes is appropriate for the target market including the likely objectives, financial situation and needs of consumers in the target market.	

## Distribution Conditions

<p><b>Authorisation</b> This condition applies to all conduct</p>	<p><b>Condition 1</b></p> <p>A distributor must:</p> <ul style="list-style-type: none"> <li>hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee unless an exemption applies covering the provision of credit activities in respect of the product; and</li> <li>if the distributor is not NAB: <ul style="list-style-type: none"> <li>comply with the terms and conditions of any relevant distribution agreement or arrangement with NAB</li> <li>if applicable, comply with the terms of any licensing exemption covering the provision of credit activities in respect of the product.</li> </ul> </li> </ul> <p>This condition is appropriate as it ensures distributors are appropriately authorised to provide the relevant regulated financial services and will comply with the commercial terms agreed between the distributor and NAB.</p>
<p><b>General advice including Marketing</b> This condition applies to general advice (including most marketing)</p>	<p><b>Condition 2</b></p> <p>A distributor must only provide general advice (such as marketing) as to the product if:</p> <ul style="list-style-type: none"> <li>a Target Market Determination (TMD) has been made and published for the product and has not been withdrawn</li> <li>the distributor complies with the terms of the TMD for the product</li> <li>the general advice is consistent with the consumer needs, objectives and financial situation defined in the target market for the product; and</li> <li>ASIC has not issued a Product Intervention Power restricting the publication of general advice for the product by the distributor.</li> </ul> <p>A distributor may provide general advice (such as marketing) as to the product through public channels such as:</p> <ul style="list-style-type: none"> <li>television, radio, internet (including social media), billboards and physical banners, periodicals, brochures and other marketing material available to the general public</li> <li>advertising through comparison sites and rating agencies</li> <li>NAB Branch</li> <li>NAB Business Banking Centre</li> <li>NAB Relationship Bankers</li> <li>NAB's Call Centre</li> <li>NAB's Website.</li> </ul>

	<p>It is intended that these channels may be available to persons who would not at that time qualify for the product to be issued to them in a regulated sale, for example because they are minors or do not have the income to service the product. This is because the issue of the product is subject to Distribution Conditions 1, 3 and 4 which will ensure that the product is only issued to persons for whom it will be appropriate.</p>
<p><b>Retail product distribution conduct (other than General Advice)</b></p> <p>These conditions apply to all retail product distribution conduct that is not general advice</p>	<p><b>Condition 3</b></p> <p>A distributor must only engage in retail product distribution conduct (other than general advice) if:</p> <ul style="list-style-type: none"> <li>• a TMD has been made and published for the product and has not been withdrawn</li> <li>• the distributor complies with the terms of the TMD for the product</li> <li>• ASIC has not issued a Product Intervention Power restricting the distribution of the product for the distributor; and</li> <li>• the distributor has complied with Condition 4.</li> </ul> <p>A distributor must only engage in retail product distribution conduct (other than general advice) through:</p> <ul style="list-style-type: none"> <li>• NAB Business Banking Centre</li> <li>• NAB Relationship Bankers</li> <li>• NAB's Call Centre</li> <li>• NAB's Website.</li> </ul> <p>This condition is appropriate as the issuer has distributed this product using these methods, with limited risk to consumers.</p> <p><b>Condition 4</b></p> <p>A distributor must only engage in retail product distribution conduct (other than general advice) if they have identified:</p> <ul style="list-style-type: none"> <li>• that the distribution of the product is consistent with the consumer needs, objectives and financial situation defined in the target market for the product</li> <li>• that the person is willing and able to pay the required minimum repayments including principal and interest to access the key attributes of the product</li> <li>• that the person is seeking access to a term loan with the following key attributes: <ul style="list-style-type: none"> <li>– the ability to use credit for an investment purpose in approved assets</li> <li>– variable interest rates</li> <li>– principal and interest repayments</li> <li>– interest only repayments where gearing is less than 30%.</li> </ul> </li> <li>• the key difference between: <ul style="list-style-type: none"> <li>– the product (including the specific product option requested by the person); and</li> <li>– the other product options for the product and other separate credit products issued by NAB for wholly or predominantly business purposes or investment purposes that are not credit contracts regulated under the National Consumer Credit Protection Act.</li> </ul> </li> </ul> <p>This condition is appropriate as it requires a distributor to confirm that the consumer is in the target market.</p>

## Review Triggers

<p><b>Review triggers</b></p>	<p>NAB and any distributor of this product, must cease all retail product distribution conduct (except excluded conduct) in respect of this product within 10 business days of NAB identifying a review trigger unless:</p> <ul style="list-style-type: none"> <li>• NAB has determined that this TMD continues to be appropriate; or</li> <li>• a new TMD has been made.</li> </ul> <p>The events and circumstances described below will trigger a review of this TMD if NAB determines it may relate to the appropriateness of the TMD having regard to NAB's internal policies.</p>
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	NAB will publish notice of a review on its website.
<b>Material complaints</b>	NAB actively monitors consumer complaints and will review the appropriateness of the TMD where complaints in number or significance relate to: <ul style="list-style-type: none"> <li>• consumer understanding of the risks, key terms, conditions or key attributes of this product</li> <li>• ability to repay the principal amount and interest amounts owed under the facility</li> <li>• approved financial investments.</li> </ul>
<b>Product performance</b>	NAB actively monitors product performance indicators relevant to the product and will review the appropriateness of the TMD in circumstances where: <ul style="list-style-type: none"> <li>• evidence shows that the financial situation of consumers in the target market may not be met including monitoring of: <ul style="list-style-type: none"> <li>- customers experiencing disproportionate rate of delinquencies.</li> </ul> </li> </ul>
<b>Feedback from distributors</b>	Reporting received from Distributors, or consistent feedback from Distributors which suggests that the target market or product attributes may no longer be appropriate.  Refer to reporting.
<b>Substantial product change</b>	NAB makes a substantial change to the product terms, conditions or key product attributes, including: <ul style="list-style-type: none"> <li>• adding to, removing or changing a product attribute</li> <li>• a substantial pricing change which impacts the customer value proposition of the product</li> <li>• significant changes to a distribution channel and distribution strategy.</li> </ul>
<b>Significant change to the external environment</b>	<ul style="list-style-type: none"> <li>• Regulatory or legislative environment for this product.</li> <li>• Economic and market conditions.</li> </ul>
<b>Notification from ASIC</b>	NAB receives a notification from ASIC requiring immediate cessation of product distribution, or cessation of particular conduct in relation to the product.
<b>Significant dealings</b>	Evidence that the distribution of the product or distributor conduct are significantly different to the expectations set out in the TMD.

## Reporting

<b>Reporting period</b>	The Reporting Period for this determination is quarterly during each calendar year: <ul style="list-style-type: none"> <li>• First reporting period ending on 31 March.</li> <li>• Second reporting period ending on 30 June.</li> <li>• Third reporting period ending on 30 September.</li> <li>• Fourth reporting period ending on 31 December.</li> </ul>
<b>Reporting information</b>	A distributor must provide the following information in writing as soon as practicable, or within 10 business days after the reporting period unless otherwise specified.
<b>Complaint information</b>	Complaints related to the risks, key terms, conditions or key attributes of this product including: <ul style="list-style-type: none"> <li>• the number of complaints</li> <li>• the nature and circumstances of the complaints</li> <li>• whether or not there has been or is likely to be consumer harm or detriment, and if so, the nature of the harm or detriment.</li> </ul>
<b>Feedback from distributors</b>	Feedback that the target market or key product attributes may no longer be appropriate, including about: <ul style="list-style-type: none"> <li>• ability to repay the principal amount and interest amounts owed under the facility.</li> </ul>
<b>Significant dealings</b>	If a distributor becomes aware of a significant dealing in the product or an issue with the distributor conduct, that is not consistent with the TMD, they must notify the issuer in writing as soon as practicable, and in any event within 10 business days after becoming aware.

	<b>Other information requested by NAB</b>	Any other information requested in writing by NAB from time to time subject to: <ul style="list-style-type: none"><li data-bbox="643 107 1361 170">• The request being necessary to enable NAB to meet its legal and compliance obligations; and</li><li data-bbox="643 174 1469 237">• NAB providing at least 30 days prior notice before the end of the Reporting Period.</li></ul>
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