

# Target Market Determination NAB Equity Lending Cash Management Account

| Determination Criteria          | Description   |
|---------------------------------|---|
| Start date                      | 21/06/2024  |
| 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                         | NAB Equity Lending Cash Management Account  An account used to manage cash and transaction processing as it applies to the NAB Margin Loan and NAB  Super Lever products. |

# **Target Market**

| Target market &    | Consumer needs and objectives  | Product attributes  |
|--------------------|--|---|
| product attributes | NAB Margin Loan or NAB Super Lever customers, or associated guarantors that need to isolate and preserve cash as collateral, rather than allow cash to reduce an outstanding loan balance.   | <ul> <li>This account provides the ability to receive:         <ul> <li>fixed rate advances from NAB</li></ul></li></ul>  |
|                    | Consumer financial situation   | Product attributes  |
|                    | <ul> <li>A person that:         <ul> <li>has a NAB Margin Loan and requires the management of funds in the processing of specific cash transactions or to hold cash as collateral</li> <li>has a NAB Super Lever product and requires the management of cash held as collateral</li> </ul> </li> </ul> | <ul> <li>can not be applied for by a customer</li> <li>will be opened to facilitate specific cash transactions in relation to the NAB Margin Loan.</li> <li>will be opened to facilitate cash held as collateral for NAB Margin Loan or NAB Super Lever.</li> </ul> |

| Negative target market statement | Not suitable for a person wanting a savings or transaction account.  Not suitable for a person without a:   |  |
|----------------------------------|---|--|
|                                  | <ul><li>NAB Margin Loan</li><li>NAB Super Lever.</li></ul>  |  |
| Appropriateness statement        | 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**

| Commercial compliance  | Condition 1  |  |  |
|--|--|--|--|
| This condition applies   |  |  |  |
| to all conduct   | A distributor must:  |  |  |
|  | <ul> <li>hold an appropriate Australian Financial Services Licence (AFSL) or be an authorised<br/>representative of a AFSL holder unless an exemption applies covering the provision of<br/>financial services in respect of the product.</li> </ul>   |  |  |
|  | 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.   |  |  |
| General advice   | Condition 2  |  |  |
| This condition applies<br>to general advice<br>(including most<br>marketing) | <ul> <li>A distributor must only provide general advice (such as marketing) as to the product if:</li> <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> |  |  |
|  | A distributor may provide general advice (such as marketing) as to the product through public channels such as:  • NAB Equity Lending This condition is appropriate as the target market is narrow and for restricted distribution.  |  |  |

## Retail product distribution conduct (other than General Advice)

These conditions apply to all retail product distribution conduct that is not general advice

### Condition 3

A distributor must only engage in retail product distribution conduct (other than general advice) if:

- a TMD has been made and published for the product and has not been withdrawn
- the distributor complies with the terms of the TMD for the product
- ASIC has not issued a Product Intervention Power restricting the distribution of the product for the distributor; and
- the distributor has complied with Condition 4.

A distributor must only engage in retail product distribution conduct (other than general advice) through:

• NAB Equity Lending

This condition is appropriate as the issuer has distributed this product using these methods, with limited risk to consumers.

### **Condition 4**

A distributor must only engage in retail product distribution conduct (other than general advice) if they have identified:

 that the distribution of the product is consistent with the needs, objectives and financial situation defined in the target market for the product

This condition is appropriate as it requires a distributor to confirm that the consumer is in the target market.

# **Review Triggers**

# **Review triggers**

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:

- NAB has determined that this TMD continues to be appropriate; or
- a new TMD has been made.

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.

NAB will publish notice of a review on its website.

| NAD WILL PUBLISH III | otice of a review offits website.   |  |  |
|----------------------|---|--|--|
| Material             | NAB actively monitors consumer complaints and will review the appropriateness of  |  |  |
| complaints           | the TMD where complaints in number or significance relate to consumer   |  |  |
|                      | understanding of risks, key terms, conditions or features of this product.  |  |  |
| Product              | NAB actively monitors product performance indicators relevant to the product and  |  |  |
| performance          | will review the appropriateness of the TMD in circumstances where:  |  |  |
|                      | <ul> <li>evidence shows that consumer usage is significantly different from original issuer expectations (e.g. a different product purpose)</li> <li>evidence shows that product is no longer meeting the financial situation, needs and objectives of the target market for whom the product was designed</li> </ul> |  |  |
|                      | <ul> <li>evidence shows of substantial sales outside of the Target Market.</li> </ul>   |  |  |
| Feedback from        | Reporting received from distributors, or consistent feedback from distributors  |  |  |
| distributors         | which suggests that the target market or product attributes may no longer be  |  |  |
|                      | appropriate.  |  |  |
|                      | Refer to Reporting.   |  |  |

| Substantial             | NAB makes a substantial change to the product terms, conditions or key   |
|-------------------------|--|
| product                 | attributes including:  |
| change                  | adding to, removing or changing a product attribute  |
|                         | a substantial pricing change which impacts the customer value  |
|                         | proposition of the product   |
|                         | <ul> <li>significant changes to a distribution channel and distribution strategy.</li> </ul>   |
| Significant             | Regulatory or legislative environment for this product.  |
| change to the           | Economic and market conditions.  |
| external                |  |
| environment             |  |
| Notification            | NAB receives a notification from ASIC requiring immediate cessation of product   |
| from ASIC               | distribution or particular conduct in relation to the product.   |
| Significant<br>dealings | Evidence that distribution of the product or distributor conduct are significantly different to the expectations set out in the TMD. |

# Reporting

| Keporting             | reporting  |   |  |  |
|-----------------------|--|---|--|--|
| Reporting period      | The Reporting Period for this determination is annually at review. |   |  |  |
| Reporting information |  | provide the following information in writing as soon as practicable or within 10 er the end of the relevant reporting period.   |  |  |
|                       | Complaint information  | Complaints related to risks, key terms, conditions or key attributes of this product including:  • the number of complaints  • the nature and circumstances of the complaints  • 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. |  |  |
|                       | Significant<br>dealings  | 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.                            |  |  |
|                       | Other<br>information<br>requested by<br>NAB                        | Any other information requested in writing by NAB from time to time subject to:  • The request being necessary to enable NAB to meet its legal and compliance obligations; and  • NAB providing at least 30 days prior notice before the end of the Reportin Period.  |  |  |