



## Target Market Determination: Low Deposit Home Loan

### What's a Target Market Determination?

A Target Market Determination (TMD) is a written document that describes the target market for a product (ie, who a product is appropriate for), the key attributes of a product and how a product is being distributed. A TMD also sets out when reviews need to be conducted and the relevant information that is needed by distributors of the products to identify the need for a review. A TMD is not a determination that any person is within the target market for a product. A TMD does not summarise all terms, criteria or obligations associated with a product. For more information about TMDs go to [Target Market Determination | Keystart](#). For more information about our low deposit home loan go to [Low Deposit Home Loan \(keystart.com.au\)](#).

TMDs keep customers at the centre of our approach to the design and distribution of our financial products.

#	Criteria	Responses for this product
1	Issuer	Keystart Loans Ltd ACN 009 427 034 (Australian credit licence number 381437) as trustee for the Keystart Housing Scheme Trust
2	Date this TMD is made	1 July 2023
3	Product name	Low Deposit Home Loan
4	Product Description, including key attributes	Low entry costs – low deposit and no lender’s mortgage insurance. No monthly account keeping fees. Weekly, fortnightly and monthly payment frequency options available. Only available to people wanting to live in and own a home in Western Australia. Maximum property purchase price amount varies dependent on location. Standard variable interest rate based on the Reserve Bank of Australia’s (RBA) cash rate plus a margin. This margin is subject to change. As a variable rate, the rate can go up or down over time in line with



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any movement to the RBA cash rate and any changes to the margin. Given the low deposit nature of its home loan lending, Keystart's interest rates policy enables it to manage lending risk responsibly.

Deposit requirements, income limits and property purchase price limits apply which may vary depending on whether the customer is:

- purchasing a home in a metro or regional area
- purchasing a home:
  - as a single person without dependent children
  - as a couple, or siblings
  - as a couple with dependent children

Aboriginal Home Ownership Scheme full ownership home loan is only available to Aboriginal and Torres Strait Islander people.

Redraw facility available (subject to terms and conditions).

Ability to make additional repayments at no extra cost.

Up to maximum 30-year term.

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<b>5</b>	Description of the retail class that comprises the target market	The product has been assessed as meeting the likely objectives, financial situation and needs of consumers who: <ul style="list-style-type: none"><li>• satisfy our eligibility criteria</li><li>• don't have the deposit required by other lenders</li><li>• don't want to pay lenders mortgage insurance</li><li>• want to purchase an owner occupied home in Western Australia that is available as security</li><li>• want to have a stable, permanent place to live</li><li>• are seeking to improve their financial position and security</li><li>• require flexibility including:<ul style="list-style-type: none"><li>○ want to pay off the loan as quickly as possible and increase equity in the home by making additional payments at no extra cost</li><li>○ access additional payments through a redraw</li></ul></li></ul>
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- have the ability to progressively drawdown loan to fund home construction and minimise repayments during the construction
  - interest being variable meaning it may increase or decrease

This product meets the likely objectives, financial situation and needs of consumers in the target market because it enables consumers in the target market to:

- purchase an owner occupied home sooner by lowering the entry costs with low deposit requirements and no lenders mortgage insurance
- build equity in their property by making principal and interest repayments, including additional repayments at no extra cost
- refinance with a lender offering lower interest rates when they are in a position to do so

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**6** Negative target market

This product may not be suitable for consumers who:

- are investors
- require a fixed interest rate
- require a guarantor for the loan
- are living outside Western Australia
- do not satisfy our eligibility criteria

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**7** Description of distribution conditions and restrictions

**Distribution Methods:**

Direct (online, in-person or by phone):

Keystart's contact centre team take direct calls, and walk ins from potential applicants. Our home loan specialists and dedicated Aboriginal Liaison Team also attend seminars and presentations to provide general information about Keystart's products. Only our home loan specialists assist applicants with applying for our home loan products. Home loan specialists have the necessary training, skills and knowledge to assess whether the consumer is within the target market.

Aggregators and their brokers:

Keystart has origination agreements with aggregators who have a number of brokers operating under their licenses. A broker must pass Keystart's accreditation process and supply all relevant compliance

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documents in order to be accredited to assist consumers to apply for a loan. Accredited brokers are subject to the Best Interests Duty (BID).

**Distribution Conditions:**

Direct (online, in-person or by phone):

- Adequate and ongoing training to our customer facing staff on the promotion and distribution of our products in accordance with our target market determination
- A consistent channel for complaints is publicly available
- No incentives or commission paid to our home loan specialists
- Our team is monitored via specific KPIs, e.g., deferrals rates and net promotor score

Aggregators and their brokers:

- Keystart's Origination Agreement provides contractual arrangements about the distribution and promotion of our products
- All brokers must pass Keystart's accreditation process and supply all relevant compliance documents, eg. MFAA or FBAA Membership, have an active ACL and not have any disqualifications or bans with ASIC
- Brokers are monitored via specific KPIs, deferrals, customer outcomes, net promotor score etc
- Accredited mortgage brokers are subject to a higher duty under BID to ensure that the product is in the best interests of the particular consumer
- A consistent channel for customer complaints is publicly available

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**8**      Review triggers

A review will be triggered if:

- a significant dealing of the product to consumers outside the target market occurs
- there are material changes to the product, its key attributes or distribution
- there are changes in law or its application, relevant industry codes, AFCA determinations, Court decisions or regulatory guidance
- there is a significant increase in complaints or disputes related to the product (or a significant change in their nature)
- information about the way the product is operating or being used by customers that reasonably suggests the TMD is no longer appropriate



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**9**      Review Periods      Periodic reviews: to be completed no later than 12 months from the date of the previous review.  
Review triggers: to be completed within 10 business days of a review trigger occurring that reasonable suggests that the TMD is no longer appropriate.

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**10**      Distribution Information Reporting Requirements      The following information must be provided to us through our complaints management team 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	Every 3 months
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware

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