

Target Market Determination: Shared Ownership 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 <u>Target Market Determination</u> | Keystart. For more information about our low deposit home loan go to <u>Shared Ownership Home Loan</u> (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	14 August 2023	
3	Product name	Shared Ownership Home Loan	
4 Product Description, including key Low entry costs – low deposit and no lender's mortgage insuration attributes sooner.		Low entry costs – low deposit and no lender's mortgage insurance to allow entry into home ownership sooner.	
		No monthly account keeping fees.	
		Western Australian Housing Authority co-own a share of the property with customer (up to a maximum of 40% as determined by the Western Australian Housing Authority), lowering the loan amount.	
		Weekly, fortnightly and monthly payment frequency options available.	
		Only available to people wanting to live in and own a home in Western Australia.	
		Maximum loan amount as determined by Housing Authority.	



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 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.

Ability to make additional repayments at no extra cost.

Up to maximum 30-year term.

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:
 - o as a single person without dependent children
 - as a sole parent
 - o as a couple, or siblings
 - o as a couple with dependent children
- a person of Aboriginal or Torres Strait Islander descent

There may be an alternative co-owner to the Western Australian Housing Authority for some shared home ownership loans:

- Nyamba Buru Yawuru Ltd may be the co-owner for shared ownership loans with Yawuru customers
- Access Housing Pty Ltd may be the co-owner for shared ownership loans for customers that are
 permanently disabled, or caring for a person who is permanently disabled, with a disability affecting
 housing needs.
- 5 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:

• satisfy our eligibility criteria



- don't have the deposit required by other lenders
- don't want to pay lenders mortgage insurance
- want the ability to share the costs of buying or retaining a home with a third-party permitting the purchase of a house that the customer would otherwise be unable to purchase
- want to purchase an owner-occupied home in Western Australia that is available as security
- require flexibility including:
 - o ability to pay off the loan as quickly as possible and increase equity in the home by making additional payments at no extra cost
 - o access additional payments through a redraw for fully funded loans
 - 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, no lender's mortgage insurance and the ability of co-ownership of the property with the Western Australian Housing Authority
- for fully funded loans, build equity in their property by making principal and interest repayments, including additional repayments at no extra cost.

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.

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.

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., deferral rates and net promotor score.

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.



9	Review periods	Periodic reviews: to be completed at least every 24 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.	

10 **Distribution Information Reporting** Requirements

The following information must be provided to us to the 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