



# Target Market Determination

## For Money3 Asset Finance Loans

### 1. About this document

This target market determination (TMD) seeks to offer consumers, distributors, and staff with an understanding of the class of consumers (as that term defined in section 5 of the National Credit Protection Act 2009) for which the Products have been designed, having regard to the objectives, financial situation and needs of the target market.

The Products are fixed interest rate personal loans to retail consumers. This document is not to be treated as a full summary of the Products' terms and conditions and is not intended to provide financial advice. Consumers must refer to any supplementary documents which outline the relevant terms and conditions of the Products when deciding about the Products.

The Products include the provision of credit to retail consumers pursuant to Div 2 of Pt2 of the Australian Securities Investment Commission Act 2001 (ASIC Act). Money3 Loans Pty Ltd ACN 108 979 406, Australian Credit Licence 389067 (the Issuer) is therefore a credit provider and is regulated under the National Consumer Protection Act 2009 (National Credit Act)

In this document, "we", "us", "our", "Money3" or "M3" refers to Money3 Loans Pty Ltd (ABN 36 108 979 406), Australian Credit Licence 389067.

### 2. Terms and Conditions to which this target market determination applies

This TMD applies specifically to personal loan products referred to below, to which the following Terms and Conditions apply: [Money3 Terms and Conditions](#)

- Micro Motor (loans from \$2,000 to \$15,000)
- M3 Asset Finance (loans from \$12,001 to \$100,000),

together the 'Products'.

### 3. Date from which this target market determination is effective

31 October 2023

### 4. Next Review Date

31 October 2024

### 5. Target Class

This TMD describes likely objectives of the financial situation and financial needs of the class of consumers for the Products (**Target Class**), as well as the key attribution of the Products.

The Products have been designed for consumers whose likely objectives, financial situation and needs (as listed below) are aligned with the Product features and attributes below. The Products are for those who are seeking an amount of credit for the purchase of a vehicle or asset for domestic or personal use and typically don't have access to savings for this purpose.

The Products are designed to complement both the lifespan of the type of vehicle typically purchased by the class of consumer as well as the benefit of the vehicle during this period.

## 6. Product description and key attributes

The key attributes of the Products are:

<b>TARGET CLASS</b>		
<b>Product</b>	<b>Micro Motor</b>	<b>M3 Asset Finance</b>
<b>Likely Objectives</b>	<p>This Product is suitable for consumers:</p> <ul style="list-style-type: none"> <li>• seeking finance of between \$2,000 to \$15,000 to purchase an asset (including motor vehicles);</li> <li>• seeking short to medium term fixed repayment obligations, but with the ability to repay early, without penalty;</li> <li>• seeking the certainty of fixed repayments and fixed interest charges.</li> </ul>	<p>This Product is suitable for consumers:</p> <ul style="list-style-type: none"> <li>• seeking finance of between \$5,000 to \$100,000 to purchase an asset (including motor vehicles);</li> <li>• seeking medium-term fixed repayment obligations, but with the ability to repay early, without penalty;</li> <li>• seeking the certainty of fixed repayments and fixed interest charges.</li> </ul>
<b>Likely Financial situation and needs</b>	<ul style="list-style-type: none"> <li>• Consumers who may not have sufficient savings to fund the purchase of a motor vehicle or other assets and requires funding to assist with the purchase;</li> <li>• Consumers who can service the principal balance of the loan and the interest as it accrues, together with fees;</li> <li>• Consumers who have a steady income stream including those employed full or part time; and</li> <li>• Consumers on Government Benefits;</li> </ul>	<ul style="list-style-type: none"> <li>• Consumers who may not have sufficient savings to fund the purchase of a motor vehicle or other assets and requires funding to assist with the purchase;</li> <li>• Consumers who can service the principal balance of the loan and the interest as it accrues together with fees;</li> <li>• Consumers who have a steady income stream including those employed full or part time; and</li> <li>• Consumers who receive less than 50% of their total income from Government Benefits.</li> </ul>
<b>The Products' key attributes are:</b>	<ul style="list-style-type: none"> <li>• Fixed loan terms from 24 to 48 months;</li> <li>• Loan amounts of \$2,000 to \$15,000 offered;</li> <li>• Fees and charges including               <ul style="list-style-type: none"> <li>◦ Application fees;</li> <li>◦ Fixed interest rates</li> <li>◦ Monthly account fees;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Fixed loan terms from 24 to 72 months;</li> <li>• Loan amounts of \$5,000 to \$100,000 offered;</li> <li>• Fees and charges including               <ul style="list-style-type: none"> <li>◦ Application fee;</li> <li>◦ Fixed interest rates;</li> <li>◦ Monthly account fees;</li> </ul> </li> </ul>

TARGET CLASS		
Product	Micro Motor	M3 Asset Finance
	<ul style="list-style-type: none"> <li>• Early repayment ability without penalty.</li> </ul>	<ul style="list-style-type: none"> <li>◦ Risk fee (for principal loan amounts of \$12,000 or more);</li> <li>• Early repayment ability without penalty.</li> </ul>
<b>Excluded/Ineligible class of consumers</b>	<p>Money3 has deemed that the Products are not suitable for the following class/type of consumers:</p> <ul style="list-style-type: none"> <li>• Consumers under the age of 18</li> <li>• Consumers seeking a variable interest rate</li> <li>• Consumers seeking variable repayments</li> <li>• Consumers who are not an Australian citizen or permanent resident</li> <li>• Consumers residing in hostel, hotels and motels</li> <li>• Consumers solely on Jobseeker, Austudy, Abstudy and Youth Allowance</li> <li>• Consumers with credit score below 100 (excluding negative scores)</li> </ul>	<p>Money3 has deemed that the Products are not suitable for the following class/type of consumers:</p> <ul style="list-style-type: none"> <li>• Consumers under the age of 18</li> <li>• Consumers seeking a variable interest rate</li> <li>• Consumers seeking variable repayments</li> <li>• Consumers where income from Government Benefits exceed 50%</li> <li>• Consumers who are not an Australian citizen or permanent resident</li> <li>• Consumers residing in hostel, hotels and motels</li> <li>• Consumers solely on Jobseeker, Austudy, Abstudy and Youth Allowance</li> <li>• Consumers with credit score below 100 (excluding negative scores)</li> </ul>

### Acceptable asset types

Cars	Motorbikes	Dirt Bikes	Trailers
Caravans	All-Terrain Vehicle (ATV)	Camper Trailers	Ride on assets (e.g., mowers)
Boats	Personal Watercraft (PWC)	Go Karts	Scooters
Tractor	Bus	Horse Float	Truck

## 7. How the Products are distributed

### Distribution channels

The Products are designed to be distributed through the following means:

- Directly to consumers by online website applications at [www.money3.com.au](http://www.money3.com.au)
- Authorised brokers (who hold an Australian Credit Licence or have been appointed as an Authorised Credit Representative of an Australian Credit Licence)
- Through approved comparison websites
- Through approved referral partners

## 8. Distribution conditions

Money3 has distribution conditions in place designed to help ensure the Products are only distributed to consumers in the Target Class.

These conditions include such measures as:

For Money3 (direct), on the proprietary website:

- Knockout questions on application to determine whether the consumer is meeting the eligibility requirements for the Products and otherwise fall within the Target Class
- Website content is reviewed to ensure appropriate messaging to the Target Class

For all other distribution:

- Accreditation and onboarding of finance brokers to confirm they are qualified to distribute the Products
- Provision of Money3's eligibility criteria to accredited brokers and referral partners to ensure the Products are being recommended to consumers within the Target Class
- Checklists are provided to accredited brokers which outlines information Money3 requires from the consumer (via the broker) to verify information as well as to perform a credit assessment
- Money3's Business Development Manager is a point of contact for all approved brokers and referral partners to clarify any questions of eligibility

If Money 3 becomes aware that the distribution conditions outlined in this TMD are no longer adequate such that consumers outside of the Target Class are able to gain access to the Products, that distribution channel shall be immediately reviewed.

## 9. Adequacy of distribution conditions and restrictions

- Implementation of suitability and eligibility questions through the application process allows Money3's proprietary platform to identify those applicants who are not within the Target Class prior to any Product offer being made to a consumer
- Provision of the reference material such as checklists to accredited brokers means the consumer's required information is received by Money3 to enable assessment of suitability and eligibility prior to a Product being offered. Agreements with referral partners are made taking into consideration their access to the Target Class.
- Finance brokers that are accredited with Money3 typically share and have access to the Target Class.

Money3 has determined that the following events and circumstances will make the Products no longer appropriate to the Target Class:

- where ineligible consumer or consumers out of the Target Class are consistently able to gain access to the Products;
- in circumstances where the distribution of the Products described in this TMD are no longer applicable (e.g., distribution is extended to include third party distributors);
- where Money3 or accredited brokers' reasonably assess that the Products are no longer appropriate having regard to the objectives and financial circumstances and needs of the Target Class.

## 10. Reviewing this target market determination

We will review this target market determination in accordance with the below:

Initial review	Within one year of the effective date.
Periodic reviews	At least annually from the initial review.
Review triggers or events	<p>Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited to):</p> <ul style="list-style-type: none"> <li>• a material change to the design or distribution of the Products, including related documentation</li> <li>• occurrence of a Significant Dealing</li> <li>• an external event that would create a material change to the design or distribution of the Products, such as any changes to the legislation, media coverage or regulatory feedback;</li> <li>• significant changes in metrics, including, but not limited to, complaints, hardship applications, arrears, approved loans per distributor and per distribution channel</li> <li>• as a result of feedback or guidance from the Ombudsman, the Australian Financial Complaints Authority (AFCA), or the regulatory body Australian Securities and Investments Commission (ASIC)</li> <li>• any other reasonable circumstances which Money3 reasonably believes will warrant a review of this TMD.</li> </ul>

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

## 11. Reporting and monitoring this target market determination

Money3 will hold metric information such as arrears, hardship applications, approved, declined and withdrawn application volumes and won't need to verify this with distributors. Money3 will therefore collect the following information from all distributors, apart from Money3 (in its capacity as distributor), in relation to this TMD:

Complaints	Confirmation in writing to Money3 details of complaints in relation to the product(s) covered by this TMD as soon as they become aware of the complaint.
Feedback and reviews	Any anecdotal feedback and/or reviews received from the customer in relation to the asset finance loan products on a quarterly basis.
Dealings outside the TMD	As soon as practicable, information about a transaction that falls outside the TMD
Significant dealings	Report to ASIC and Money3 if they become aware of a Significant Dealing in relation to this TMD within 10 business days.

Money3 frequently monitors application and sales volumes to ensure distribution of the Products are reaching the Target Class.

Where the application and/or sales volumes of a distributor is lower than reasonably expected, Money3 will review the arrangement with this distributor, and specifically that distributor's access and interaction with the Target Class. A review by Money3 may result in the distributor no longer distributing the product.