

HOW TO USE THIS DOCUMENT

The purpose of this document is to provide guidance on completing a Target Market Determination (TMD) to meet the requirements of the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Bill*.

In using this document consider the nature of the product, including any product variations, and the distribution approach when creating the TMD.

Target Market Determination

- Continuing Credit Contracts “CCC”
- Medium Amount Credit Contract “MACC”
- Secured and Unsecured Loans >\$5000 – Also known as an Other Amount Credit Contract or “OACC”

1. About this document

This target market determination (TMD) seeks to offer consumers, distributors, and staff with an understanding of the class of consumers for which this product has been designed, having regard to the objectives, financial situation and needs of the target market.

This document is not to be treated as a full summary of the product’s terms and conditions and is not intended to provide financial advice. Consumer must refer to the Contractual Terms and Conditions and Privacy Policy and any supplementary documents which outline the relevant terms and conditions under the product when making a decision about this product.

This TMD applies to CCC’s, MACC’s, and OACC’s referred to and written under the following G2G Policy Documents

- o G2G Credit Guide Brochure
- o G2G Privacy Policy
- o G2G NCCP Compliance Plan
- o Electronic Transactions Act
- o National Consumer Credit Protections Act

Date from which this target market determination is effective

14th June 2023.

2. Class of consumers that fall within this target market

The information below summarises the overall class of consumers that fall within the target market for CCC’s, MACC’s and OACC’s, based on the product key attributes and the objectives, financial situation and needs that it has been designed to meet. These products have been designed for consumers whose likely objectives, financial situation and needs (examples as listed below) are aligned with the product (including the key attributes). A CCC, MACC or OACC is for those who:

- o Are seeking an amount of credit for the purposes of a mechanical expense, registration or insurance, event or outing, household goods or renovations, weddings or funerals, motor vehicle or boat and basically any item that is considered essential or otherwise. A CCC, MACC or OACC is a short-term advance or Small Line of Credit to meet a cash shortfall of any kind, for any consumer, of any age, providing the application meets a very strict financial analysis under the NCCP Act along with other regulatory guides the corporation abides to.

It’s important to note that it is generally easier to define those that fall outside the target market, which we have detailed below.



Product description and key attributes

The key eligibility requirements and product attributes of a CCC, MACC or OACC are:

- Term of the loan, how interest, fees, charges and repayments are structured for circumstance, restrictions on type of income and housing and representation arrangements if applicable.
- Typically, for G2G Loans, a CCC is a Line of Credit from \$400 to \$10,000 with flexible repayments, structured with drawdown facilities, with no set end date. These loans contractually have an interest and fee component that does not exceed the annual cost rate of 48%. This product offers long term viability and flexibility for most.
- Typically, for G2G Loans, a MACC is a loan between \$2,001 and \$5,000 with repayment periods from 7 months to 18 months. These have a maximum establishment fee of \$400 + 48% interest rate. This product is suitable for those that require a once off advance from \$2,001 to \$5,000 that do not wish to keep a credit facility after this advance is paid out.
- Typically, for G2G Loans, a OACC is a loan >\$5,000 and generally secured. These will have an establishment fee and interest component with flexible repayments and terms. Typically, these are for large item purchases.
- Product must be not unsuitable, meaning the purpose of the loan must be tangible under the circumstances and the product must meet or contribute to that purpose to derive a benefit to the consumer.

Objectives, financial situation, and needs

This product has been designed for individuals who:

- Are seeking an amount of credit, or line of credit for the purposes of a mechanical expense, registration or insurance, event or outing, household goods or renovations, weddings or funerals, motor vehicle or boat and basically any item that is considered essential or otherwise. A CCC, MACC or OACC is a short-term advance or Small Line of Credit to meet a cash shortfall of any kind, for any consumer, of any age, providing the application meets a very strict financial analysis under the NCCP Act along with other regulatory guides the corporation abides to.

Excluded class of consumers

This product has not been designed for individuals:

- That are represented, in hardship or for when hardship looks apparent.
- Where the product appears to be unsuitable or does not meet the purpose.
- Where the product does not offer any benefit or advantage to the consumer's objectives.
- That are unable to meet a suitable financial analysis showing ample expendable income to service the debt without hardship.
- Where the product is unable to be written without compliance to the NCCP Act and other guides the company abides to.
- Who's income levels are too low to be considered, like those on Centrelink Benefits like "NewStart".
- Who show patterns of gambling excessive amounts of their weekly total income.
- That are deemed after our assessment that exhaust unsustainable and excessive amounts of their weekly income on products like Buy Now Pay Later and Wage Advance products, not leaving enough for basic living needs.

Consistency between target market and the product

Consistency between consumer and product is based on need, objectives and financial affordability for each individual and their circumstances. This is based on an analysis of the key terms, features and attributes of the product and a finding that these are consistent with the identified class of consumers.

3. How this product is to be distributed

Distribution channels

This product is designed to be distributed through the following means:

- online, contact centres; franchise network; authorised representatives etc...

Distribution conditions

This product should only be distributed under the following circumstances:

- o to individuals that meet eligibility requirements, individuals that have the appropriate borrowing capacity, and in accordance with lending guidelines by G2G Loans and under the NCCP Act and other regulatory guides the corporation abides to.

Adequacy of distribution conditions and restrictions

This is based on an assessment of the distribution conditions and restrictions and that they are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

4. Reviewing this target market determination

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

Initial review	Within the 1 st 12 months of the effective date.
Periodic reviews	At least every 3 years from the initial review.
Review triggers or events	Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited to): <ul style="list-style-type: none"> • a material change to the design or distribution of the product, including related documentation. • occurrence of a significant dealing. • distribution conditions found to be inadequate. • external events such as adverse media coverage or regulatory attention. • significant changes in metrics, including, but not limited to, complaints etc. • significant increase in declined applications and/or defaults. • breach of the NCCP Act and Responsible Lending Guidelines. • change in legislation.

Where a review trigger has occurred, this target market determination will be reviewed within 30 business days.

5. Reporting and monitoring this target market determination

We may collect the following information from our distributors in relation to this TMD.

Complaints	G2G Loans and its distributors will report to the issuer (Good to Go Loans Pty Ltd, Management Team) all complaints in relation to the product(s) covered by this TMD either at that time or on a quarterly basis through systems implemented to capture as such. This will include written details of the complaints.
Significant dealings (If a substantial amount of distribution is occurring outside the TMD or if distribution outside the target market is causing significant consumer harm)	G2G Loans and its distributors will report to the issuer (Good to Go Loans Pty Ltd, Management Team) if they become aware of a “significant dealing” that is not consistent with this TMD within 10 business days. The issuer on receipt of these significant dealings will report to ASIC within 10 business days.
Reporting to ASIC on request	In the event there are no breaches in the review period that require reporting to ASIC, G2G Loans, on request from ASIC, would provide the terms in which our TMD applies which would determine as there were no Compliance breaches in the reporting period, that this would relate to no breaches to our Design and Distributions Obligations in that same period, thus nothing to report.

