Target Market Determination

Issuer/Lender:	Bennetto Finance Pty Ltd, ABN: 32 009 489 507, AFSL and ACL (Number 283141)
Product:	Personal Loan
Date of TMD:	5th November 2026

1. About this document

This document is a target market determination ("**TMD"**) for the purposes of section 994B of the Corporations Act 2001 (Cth) ("**Corporations Act**") in respect of a loan provided to consumers for personal, household or domestic purposes ("**Personal Loan**") by Bennetto Finance Pty Ltd **("Bennetto Finance")**.

This document applies to prospective clients who are consumers ("**Clients**") and does not apply to the commercial lending activities which are also undertaken by Bennetto Finance. The Personal Loan that is the subject of this TMD is a consumer loan product regulated by the National Consumer Credit Protection Act 2009 ("**Credit Act**"). Bennetto Finance's Personal Loans have been designed with the key attributes as described in section 2 of this TMD. Bennetto Finance also satisfies the responsible lending criteria prescribed by the Credit Act in assessing and approving Personal Loans.

This TMD is not to be considered a full summary of the product's terms and conditions and is not intended to provide financial product advice. Clients must read the loan contract which sets out the full terms and conditions of the Personal Loans provided by Bennetto Finance when making a decision about this product.

This TMD seeks to offer Clients, distributors and staff of Bennetto Finance with an understanding of the class of Clients for which this product has been designed, having regard to the objectives, financial situation and needs of the target market noting that at the date of this TMD the only distributors of this product are staff of Bennetto Finance.

2. Key Attributes of the Loan Contracts

The key attributes of the Personal Loans are:

- Borrow between $5,000 and $50,000;
- The purpose of the Personal Loan must be for personal, household or domestic purposes and generally relate to motor vehicles, boats, marine industry goods and other assets deemed suitable by Bennetto Finance to support the required level of borrowing by the Client. Another possible purpose of a Personal Loan (other than to finance the purchase of an asset) could be to provide finance to a client on a temporary basis pending that client being approved by their bank for an increase in a mortgage loan;
- A Personal Loan is usually a 3 year term but may be between 2 and 5 years (or in the case of a temporary basis the term may be between 1 and 3 months;
- Fixed rate of interest for the period of the Personal Loan;
- Repayable on a monthly instalment basis and includes both principal and interest;
- A Personal Loan may be repaid before the Personal Loan term expires (and additional charges may apply);
- A Personal Loan is secured by the asset being financed and/or additional assets;
- The value of the Personal Loan is generally no more than 70% of the wholesale valuation of the asset being financed;
- Only after careful consideration of its responsible lending obligations, Bennetto Finance enters into a loan contract to lend funds to Clients in the form of a Personal Loan;
- Loan contract that is relatively simple and easy to read and understand.

Refer to our loan contract for additional information, including the fees and charges.

3. Target Market for the Personal Loans

Consumers - individual or joint borrowers - who:

- Are generally directors or employees of companies and businesses to which Bennetto Finance provides commercial loans;
- Have been provided a Personal Loan previously by Bennetto Finance i.e. a repeat customer;
- Are over 18 years of age;
- Have a verifiable source of income to demonstrate ability and capacity to repay the proposed Personal Loan i.e. they can afford to repay the Personal Loan;
- Have an established credit history;
- Can provide at least 90 days of bank statements presenting all income and living expenditure and demonstrating financial management without substantial hardship;
- Are prepared to allow Bennetto Finance to accept the asset being financed as security in the event that the Client is not able to meet the terms and conditions of the Personal Loan;
- Are permanent residents; and
- Satisfy the responsible lending requirements in the Credit Act.

4. Likely Objectives, Financial Situation and Needs of Clients in the Target Market

Overall, the Personal Loans have been designed for Clients who have the following characteristics:

Likely Objectives of Clients:

A Client's likely objectives in applying for a Personal Loan is to purchase an asset such as:

- Boat;
- Motor vehicle including motor bike;
- Marine industry goods such as sails and motors; or
- Caravan.

Another likely objective of a Client could be obtaining a short term Personal Loan pending that client being approved by their bank for an increase in a mortgage loan.

Likely financial situation of Clients:

A Client's likely financial situation may include:

- Employed full-time and generates appropriate level of income to demonstrate ability and capacity to repay the proposed Personal Loan;
- Employed part-time or retired and able to demonstrate ability and capacity to repay the proposed Personal Loan;
- Established credit history;
- Acceptable credit score;
- Income in excess of existing expenses (including existing loan repayments and general living expenses) and proposed loan repayments; or
- Can provide at least 90 days of bank statements presenting all income and living expenditure and demonstrating financial management without substantial hardship.

Likely needs of Clients:

- An efficient application process;
- Prompt consideration of an application;
- Certainty of the amount of repayments as fixed interest rate during the term of the Personal Loan;
- Objective assessment of the proposed Personal Loan in accordance with the responsible lending provisions if the Credit Act; or
- Relatively simple and easy to read and understand loan contract.

5. Why a Personal Loan is likely to be Consistent with the Likely Objectives, Financial Situation and Needs of the Target Market

A Personal Loan is a product which is a relatively simple product for limited uses and designed to avoid complexity.

The features of a Personal Loan are consistent with the likely objectives, financial situation and needs of the consumers applying for a Personal Loan provided by Bennetto Finance.

5.1 Excluded Classes of Clients

Many Clients will be outside the target market for a Personal Loan as they have **not** been designed for Clients who:

- Are under 18 years of age;
- Do not understand the risks of borrowing and repaying loans;
- Do not have sufficient income to demonstrate the ability and capacity to repay the proposed Personal Loan;
- Have substantial debts and unable to demonstrate the ability and capacity to repay the proposed Personal Loan;
- Are bankrupt;
- Have defaulted on previous loans;
- Do not satisfy the assessment criteria applied by Bennetto Finance being the responsible lending requirements in the Credit Act e.g. are unable to provide the relevant financial information to enable Bennetto Finance to verify all sources of income;
- Not a permanent resident;
- Are not prepared to allow Bennetto Finance to accept the asset being financed as security; or
- Have indicated, directly or indirectly, that they may not be of sound mind or judgement or that they are suffering from an addiction or impairment that could prevent their clear comprehension of the associated risks when borrowing funds.

6. How Personal Loans are Distributed

Bennetto Finance both 'issues' (as credit provider) and distributes the Personal Loans via its appropriately trained and qualified employees.

Bennetto Finance does not appoint any brokers (being credit assistance providers) to distribute its Personal Loans.

6.1 Promotion and Distribution Channels

This product has not specifically been designed to be promoted or distributed other than generally to existing individuals associated with customers of the commercial lending part of the credit provider business.

Bennetto Finance generally relies on Clients to approach it with their needs. Prospective borrowers are usually known to Bennetto Finance. The majority of Personal Loans are for repeat customers with a proven track record. Other customers may come to Bennetto Finance via "word of mouth" or a recommendation from existing customers or from Finance Brokers. However, such Finance Brokers are mere referrers to Bennetto Finance and have not been appointed to, nor do they, engage in 'retail product distribution conduct' (as that term is defined in section 994A(1) of the Corporations Act).

6.2 Distribution conditions and restrictions

The limited distribution and promotion of Personal Loans can only take place where it is reasonably likely to only reach Clients in the target market.

In any event, Personal Loans should only be distributed to a Client where they meet the eligibility requirements determined by Bennetto Finance including, importantly, meeting the responsible lending requirements in the Credit Act and the Client is reasonably likely to fall within the target market.

6.3 Adequacy of distribution conditions and restrictions

Bennetto Finance has internal processes in place to assess and approve applications for a Personal Loan. The distribution criteria ensures that only Clients who fall within the target market of this TMD can access the product offered. Distribution conditions are reviewed internally regularly.

7. Reviewing this TMD

Bennetto Finance will review this TMD to ensure it remains appropriate in accordance with the following:

Periodic reviews	Each 12 months by no later than the anniversary date of the previous review.
Review triggers	The review triggers that may suggest that the TMD is no longer appropriate, such that a review of the TMD should be undertaken, include: ● Bennetto Finance becomes aware of a significant number of applications of a Personal Loan to Clients are outside the target market; ● Bennetto Finance becomes aware of an increase in default rates or receipt of hardship notices; ● Material changes to the Personal Loan whereby the key attributes are no longer consistent with the likely objectives, financial situation and needs of Clients in the target market; ● Material changes to the business of Bennetto Finance;

- Material changes to law or regulation affecting Personal Loans (i.e. consumer loans);
- Bennetto Finance becomes aware of a significant volume of complaints from Clients receiving a Personal Loan;
- Bennetto Finance becomes aware of an occurrence of a 'significant dealing' indicating a material inconsistency between this TMD and the Personal Loan and/or Target Market;
- Bennetto Finance becomes aware of a financial hardship by Clients in repaying Personal Loans where it has caused a distress or material impact to their living standards; or
- any other event or circumstance that would materially change a factor taken into account in making this TMD for Personal Loans.

Where a review trigger has occurred, this TMD will be reviewed, and updated where required, within 10 business days.

8. Reporting and monitoring this TMD

The following information must be provided to Bennetto Finance by 'distributors' (i.e. employees of Bennetto Finance) who engage in retail product distribution conduct in relation to Personal Loans:

Complaints	Distributors will report all complaints in relation to the product covered by this TMD as they arise. This includes the substance of the complaint, including all details about the complaint.
Significant dealings	Distributors will report if they become aware of a 'significant dealing' in relation to this TMD within 10 business days. This includes the date or date range of the significant dealing and a description of the significant dealing (e.g. why it is not consistent with the TMD). Whether or not a dealing is significant is a matter to be determined in the circumstances of each case. Notwithstanding, a number of factors should be considered such as: (i) the proportion of Clients who are not in the target market; (ii) the actual or potential harm to Clients, including the amount of any financial loss, resulting from Clients who are not in the target market acquiring the product; (iii) the nature and extent of the inconsistency of distribution with the TMD; (iv) the proportion of gross income obtained from the product in respect of Clients who are not in the target market acquiring the product; and (v) the time period in which these acquisitions outside the target market occurred.