



Target Market Determination for Ocean SMSF Variable

This Target Market Determination (**TMD**) which is required by law is to make sure that our customers objectives and needs are considered when designing and distributing our credit products. This TMD describes the type of customers that our product is targeted at (the **Target Market**) and any conditions around how we allow the product to be distributed to our customers (**Distribution Conditions**). We have also included the events or circumstances where we will review this TMD and ensure that it is still appropriate for our product (**Review Triggers**).

IMPORTANT: This TMD is general in nature and should not be construed as or used to substitute for professional financial or legal advice. It is important to understand that this TMD does not consider the specific objectives, financial situation, or needs of any customer on an individual level. If you are considering acquiring the product(s) referred to in this TMD, to ensure that these product(s) align with your unique personal and financial circumstances, we strongly recommend that you carefully review the product(s) relevant terms and conditions and credit guide and seek independent financial or legal advice before making any decision.

Product	Ocean SMSF- Variable Investment	
Product Manager	Columbus Capital Pty Ltd ACN 119 531 252, Australian Financial Services Licence and Australian Credit Licence 337303	
Mortgage Manager	WLTH Lend Pty Ltd (ACN 641 398 816 CRN 525 783) as authorised by WLTH Pty Ltd (ACN 639 591 245 ACL 525 752)	
Issuer	<p>This product will be issued by a Lender* which will be named in the loan agreement and these products are managed and serviced by the Product Manager. The product could be issued by any of the Lenders* named below</p> <ul style="list-style-type: none"> (a) Perpetual Corporate Trust Limited (ACN 000 341 533), Australian Credit Licence 392673; (b) Pioneer First Australia Pty Limited ACN 086 092 613; (c) Origin Mortgages (Aus) Pty Ltd ACN 086 045 721; (d) Origin Money Pty Ltd ACN 621 866 242; and (e) Origin Mortgages Pty Ltd ACN 629 566 794; <p>to be referred to as (Columbus/we/us).</p>	
Effective Date of TMD	20 February 2024	
TMD Version	2024.1	
Next review date:	At least every 12 months from the Effective Date of this Target Market Determination	
TARGET MARKET		
We have undertaken an assessment of the product and are of the view that the Product Attributes are likely to be consistent with the Objectives and Needs of the Target Market.		
Product designed for customers who:	Key Product attributes appropriate for Target Market:	
<p>Seeking an investment loan with the certainty of fixed over a set period for any of the following purposes:</p> <ul style="list-style-type: none"> m purchasing, refinancing, a residential, investment, NDIS or commercial investment property; m purchase of investment house and land package and/or; m off the plan purchase as investors. 	<p>The investment account will receive a fixed interest rate between 1 and 5 years, meaning repayments will be fixed for the selected term.</p> <p>The Fixed Rate property loan will change to a Standard Variable Rate property loan, after the set fixed interest rate period expires. The interest rate and repayments will become variable, unless it is switched to another loan type including a new Fixed Rate property loan.</p> <p>Additional charges including an early repayment adjustment (i.e. Break costs) may apply if a customer wishes to break their fixed term early or pay the loan out early.</p> <p>The loan amount can be used for any one or more of the listed purposes.</p> <p>SMSF Investment & Commercial Investment loans offer:</p> <ul style="list-style-type: none"> m Principal and Interest; or m Interest Only, is available for an agreed period. <p>SMSF NDIS Investment loans offer:</p> <ul style="list-style-type: none"> m Principal and Interest <p>Fees, charges, and third-party costs will be payable.</p>	

Columbus Capital Pty Limited trading as Origin Mortgage Management Services
ACN 119 531 252, Australian Credit Licence Number 337303



Target Market Determination

About the SMSF

for Ocean SMSF Variable

<ul style="list-style-type: none"> Flexibility to make additional payments more than the required monthly repayment amount and switch between principal & interest and interest only repayments. 	<ul style="list-style-type: none"> Unlimited additional repayments (including the ability to pay the loan out early) can be made without additional charge. A customer can switch between principal & interest and interest only repayment (terms and conditions apply).
<ul style="list-style-type: none"> Option to link an Offset Account for the purposes of reducing the amount of interest payable under the loan 	<ul style="list-style-type: none"> Credit balances in the Offset Account will reduce the balance on which interest is charged. Customers can deposit, withdraw, or transact on the account via a broad range of channels by using: <ul style="list-style-type: none"> Online and Mobile Application access; Direct debit & BPAY repayment facility; and Staff assisted channels.

ELIGIBILITY CRITERIA FOR THE PRODUCT

To be eligible for this product the customer must meet certain eligibility criteria, including that the customer:

- have a registered and compliant Australian Self-Managed Superannuation Fund (SMSF) and are:
 - the member and directors of the SMSF are an Australian Citizen or a Permanent Resident of Australia;
 - a SMSF has a Corporate Trustee;
 - must hold a beneficial interest in the security property;
 - must meet all relevant legislative & associated regulation requirements to acquire the property & borrow from the Property Trustee in accordance with the Superannuation Industry (Supervision) Act 1993; and
 - must hold the legal interest in the security property on trust for the SMSF;
- meet our lending eligibility criteria;
- provide sufficient security in accordance with our lending eligibility criteria; and/or
- guarantor who supports the loan also meets our lending eligibility criteria.

FINANCIAL INSTITUTION

The financial situation of the Target Market are consumers that:

- meet our lending eligibility and credit assessment criteria which includes demonstrating serviceability of the loan;
- demonstrate the capacity to make the required repayments and the ability to pay off the loan without substantial hardship; and
- where determined by us to be required, (based on the customers' deposit size, security, applicant, and loan attributes), will pay Lenders Mortgage Insurance or have an acceptable guarantor.

Upon application we will undertake an assessment to determine the consumer's ability to service the loan, which is a process of determining that the product is consistent with the financial situation of the Target Market.

Columbus Capital Pty Limited trading as Origin Mortgage Management Services
ACN 119 531 252, Australian Credit Licence Number 337303



Target Market Determination

for Ocean SMSF Variable

Distribution Channels	<p>Columbus has oversight over how the product is promoted and issued. The following distribution channels and conditions have been assessed as being appropriate to direct the distribution of the product to the target market:</p> <ul style="list-style-type: none"> ▪ Direct <ul style="list-style-type: none"> - Online - By phone - In person (e.g. branch, agency, or premises visit) ▪ Third party – Accredited mortgage brokers subject to their Best Interests Duty (BID) obligations <p>The distribution channels and conditions are appropriate because:</p> <ul style="list-style-type: none"> ▪ the product has a wide target market; ▪ our staff have the necessary training, knowledge and accreditation (if required) to assess whether the consumer is within the target market, all of our staff must continually satisfy annual compliance reviews. ▪ we rely on existing distributors, methods, controls and supervision already in place; ▪ our approval system has checks and controls in place to flag applicants who may be outside the target market; and ▪ accredited mortgage brokers are subject to BID to ensure that the product is in the best interests of the particular consumer.
Distribution conditions	<p>A distributor must:</p> <ul style="list-style-type: none"> ▪ Hold an Australian Credit Licence or be a Credit Representative authorised to engage in credit activities on behalf of a credit licensee; and ▪ Comply with the terms and conditions of any relevant distribution agreement or arrangement with the Product Manager. <p>This condition ensures distributors are appropriately authorised to provide the relevant regulated financial services and will comply with the commercial terms agreed between the distributor and Product Manager.</p> <p>This condition applies to all conduct by the distributor.</p>
TMD REVIEWS	
<p>Columbus has outlined below its review triggers of this product. This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers of this product are:</p>	
Initial review	Within 12 months of the date of this TMD
Periodic review	Each year on the anniversary of this TMD.
Review triggers	<p>Specific events will prompt Columbus to review this TMD, which includes:</p> <ul style="list-style-type: none"> ▪ A significant dealing of the product to consumers outside the target market occurs; ▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance; ▪ A significant number of material complaints are received from consumers in relation to the product; ▪ Unexpected early stage arrears are detected; ▪ A significant number of defaults occur;

Columbus Capital Pty Limited trading as Origin Mortgage Management Services
ACN 119 531 252, Australian Credit Licence Number 337303



Target Market Determination

for Ocean SMSF Variable

	<ul style="list-style-type: none"> A significant breach has occurred in connection with the issuing and distribution of this product; A significant number of late repayments are being recorded; A material change is made to this product; Evidence that the product or distributor conduct are significantly different to the target market; or The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product. <p>If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.</p>
--	---

DISTRIBUTOR REPORTING REQUIREMENTS

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
Complaints	Number of 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 following the end of a calendar quarter
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after becoming aware
Feedback	Details of any suggested feedback and improvements	As soon as practicable, and in any case within 10 business days after becoming aware
Information requested	Any other information requested by the Product Manager	As soon as practicable, and in any case within 10 business days after receiving such request

Columbus Capital Pty Limited trading as Origin Mortgage Management Services
 ACN 119 531 252, Australian Credit Licence Number 337303