

**Issue Date: 4 October 2024**

This Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth) (Act). It describes the class of consumers that comprises the target market for the Loan Product and matters relevant to the Loan Product’s distribution and review (specifically distribution conditions, triggers to review the target market and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the Loan Product being consistent with the most recent TMD (unless the distribution is excluded conduct). It forms part of La Trobe Financial’s design and distribution arrangements for the Loan Product.

This document is not a summary of the product features or terms of the Loan Product. This document does not take into account any person’s individual objectives, financial situation or needs. Consumers interested in acquiring this Loan Product should carefully read the Letter of Offer (loan agreement) and other loan documents issued to them before deciding whether to proceed.

### 1. Product Description

Loan Product	La Trobe Financial Aged Care Loan.
Issuer	Perpetual Corporate Trust Limited as trustee for, or custodian of, a trust or managed investment scheme.
La Trobe Financial	La Trobe Financial Services Pty Limited (ABN 30 006 479 527) is the Issuer’s representative.
TMD Version	4.0

### 2. Description of target market for the Loan Product

The Consumer Attributes column in the table below indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering the Loan Product.

Category	Consumer Attributes
<b>Consumer Type</b>	<p>Suitable for individuals aged over 80 who are considering moving into aged care or already a resident (younger borrowers may be considered on application). These individuals may also wish to fund repairs to a security property, repay debts/mortgage and/or repay fees.</p> <p>This Loan Product is designed to assist in paying the Refundable Accommodation Deposit (RAD) when a consumer enters into an aged care home.</p>
<b>Likely Objectives and Needs</b>	<p>This Loan Product is likely to be suitable for consumers seeking the following:</p> <p>Primary Purpose</p> <ul style="list-style-type: none"> <li>• funding the RAD payable on the move to aged care whilst retaining the family home;</li> </ul> <p>Additional Permitted Loan Purposes</p> <ul style="list-style-type: none"> <li>• funding for repairs to security property;</li> <li>• funding for repayment of debts/mortgage; and/or</li> <li>• payment of loan set up fees.</li> </ul>
<b>Likely Financial Situation</b>	Suitable for consumers whose financial situation provides access to income or funds to satisfactorily meet repayment obligations once the total balance of the loan increases to 140% of the settlement amount.

### 3. Consistency of Loan Product’s features with consumer attributes of Target Market

La Trobe Financial has assessed the Loan Product and formed the view that the Loan Product, including its key attributes summarised below, is likely to be consistent with the likely objectives, financial situations and needs of consumers in the target market, as the features of this Loan Product, including its key attributes, summarised below are likely to be suitable for consumers with the attributes summarised in Section 2 above.

Key attributes	Features	Suitable for Consumers within the Target Market
<b>Acceptable security</b>	Residential owner occupied or investment property within Australia that is able to be secured by a registered mortgage with a maximum LVR of 50%.	<p>Consumers looking to fund the RAD who own an owner-occupied or investment property within Australia that is able to be secured by a registered mortgage.</p> <p>This product is likely to be suitable for consumers seeking a loan with a maximum LVR of 50% at origination.</p>

Key attributes	Features	Suitable for Consumers within the Target Market
<b>Loan term</b>	Up to 7 years	This product is likely to be suitable for consumers who expect to be able to repay the loan within 7 years.
<b>Loan amount</b>	The loan amount meets the stated minimum and maximum loan amount requirements notified by the Issuer from time to time.	This product is likely to be suitable for consumers seeking a loan within the minimum and maximum loan amounts notified by the Issuer from time to time.
<b>Repayment type</b>	Capitalisation of Interest / Interest Only	This product is likely to be suitable for consumers seeking a loan with interest capitalised up to a total loan balance of 140% of the initial settlement amount.  Repayment of interest is only required to be made when the total balance of the loan increases to 140% of the initial settlement amount or when repayment events include the consumer leaving aged care to return home, passing away, selling their property or the 7 year term being reached.
<b>Interest rate</b>	Variable	This product is likely to be suitable for consumers looking for rate fluctuations through variable rates. A variable interest rate means the applicable interest rate can increase or decrease during the loan term.
<b>Additional repayments allowed</b>	Yes	This product is likely to be suitable for consumers looking for flexibility with respect to making additional repayments at no additional cost.
<b>Redraw available</b>	Not available	This product is likely to be suitable for consumers who do not require a redraw facility.

#### 4. Distribution conditions/restrictions

Distributors this condition applies to	Distribution conditions	Distribution conditions rationale
<b>Direct to Consumer</b>	La Trobe Financial's sales and credit staff are required to be properly trained in DDO and undergo at least annual training.  La Trobe Financial conducts a credit assessment on every loan application to ensure that the loan is capable of being serviced based on the consumer's stated financial situation. Only trained and accredited staff with the required delegated lending authority conduct each respective assessment and in accordance with the relevant laws and internal policies.	This distribution condition will make it more likely that La Trobe Financial's sales or distribution and credit staff will identify if a consumer is not within the target market. By virtue of this assessment, those consumers who enter into a credit contract for the product are highly likely to be in the class of consumers for which it has been designed.
<b>Marketing</b>	No Loan Product marketing, advertising or promotional material may be sent or made available by La Trobe Financial unless La Trobe Financial has completed an external communications compliance checklist	La Trobe Financial has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because distributors using this promotional material will not be promoting the Loan Product in a way that could misrepresent the Loan Product or likely direct marketing to potential consumers outside the target market.

Distributors this condition applies to	Distribution conditions	Distribution conditions rationale
<b>Third-Party Distribution</b>	<p><b>Legal Obligations</b></p> <p>All third-party distributors must meet all ongoing regulatory and disclosure obligations relating to their position in the market, including responsible lending obligations and best interests duty.</p> <p>Third-party distributors are required to hold an Australian Credit License or maintain an appointment as a credit representative authorised to engage in credit activities on behalf of a credit licensee.</p> <p>La Trobe Financial conducts a credit assessment on every loan application to ensure that the loan is capable of being serviced based on the consumer's stated financial situation. Only trained and accredited staff with the required delegated lending authority conduct each respective assessment and in accordance with the relevant laws and internal policies.</p> <p><b>Marketing, Advertising &amp; Promotion</b></p> <p>Third-party distributors may not use marketing, advertising or promotional materials that are inconsistent with La Trobe Financial's issued materials.</p> <p><b>Distribution Agreement</b></p> <p>Where a third-party distributor has entered into a distribution agreement with La Trobe Financial, each third-party distributor must meet on an ongoing basis La Trobe Financial's accreditation requirements and must comply with their respective distribution agreement.</p>	<p><b>Legal Obligations</b></p> <p>In relation to aggregators and brokers, La Trobe Financial has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because the aggregator or broker has its own obligations as a distributor to take reasonable steps that will or are reasonably likely to result in retail product distribution conduct being consistent with this TMD.</p> <p><b>Marketing, Advertising &amp; Promotion</b></p> <p>La Trobe Financial has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because distributors using promotional material will not be promoting the Loan Product in a way that could misrepresent the Loan Product or likely direct marketing to potential consumers outside the target market.</p> <p><b>Distribution Agreement</b></p> <p>La Trobe Financial has assessed that this distribution condition is likely to result in distribution to consumers who are likely to be in the target market because requiring distributors to comply with relevant conditions of distribution aims to reinforce to the distributor that the Issuer is committed to its compliance with the DDO regime.</p>

## 5. Reviewing this TMD

This TMD will be reviewed by La Trobe Financial on both:

- a scheduled basis with reviews to be completed before the end of the maximum period for review specified below; and
- where a Review Trigger (as defined below) has occurred.

### Mandatory TMD review periods

Reporting requirements	Maximum period for review
Initial review	Not applicable
Subsequent Review	4 January 2026, being 1 year and 3 months from the date of the previous TMD review.

**Note:** The review period allows for the collection of data for 12 months, plus three months for the completion of the review.

### Review Triggers

The events and circumstances described below (**Review Triggers**) will also require a review of this TMD:

- material change to the terms or attributes of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- where and when the Loan Product is not being distributed and purchased as envisaged by this TMD which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- an event or circumstance that would materially change a factor considered in making the TMD for the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- reporting from distributors of one or more 'significant dealings', multiple distributors of 'significant dealing' (see section 6 below) of the Loan Product or numerous reports from one distributor of 'significant dealings' of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- determination by the Issuer of a 'significant dealing' (see section 6 below) of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;

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- material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the Loan Product or the distribution of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate;
- a reportable situation (as defined in section 912D of the Act) has been reported in relation to the design or distribution of the Loan Product and which the Issuer reasonably considers indicates that the TMD may no longer be appropriate;
- regulatory inquiry by AFCA, ASIC or another regulatory authority as to the design or distribution of the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate; and/or
- the use by ASIC or other regulators of Product Intervention Powers, regulatory orders or directions that affect the Loan Product which the Issuer reasonably considers indicates that this TMD is no longer appropriate.

The above review triggers do not limit the Issuer's obligations under s994C(3)(ii) of the Act. When a review trigger has occurred, this TMD will be reviewed within 10 business days.

## 6. Reporting and monitoring this TMD

The following reporting requirements apply to all distributors of the Loan Product:

Reporting requirements	Reporting period
Where the distributor is aware or ought to reasonably be aware, it should report on each 'significant dealing' outside of the target market, under section 994F(6) of the Act (see guidance below) by completing the Notification of Significant Dealing Form and submitting it to: <a href="mailto:targetmarketdistribution@latrobefinancial.com.au">targetmarketdistribution@latrobefinancial.com.au</a> .	As soon as practicable but no later than 10 business days after the distributor becomes aware of the 'significant dealing'.
Distributors must report to La Trobe Financial (at <a href="mailto:targetmarketdistribution@latrobefinancial.com.au">targetmarketdistribution@latrobefinancial.com.au</a> ): <ul style="list-style-type: none"> <li>• if required by law, whether the distributor received complaints<sup>1</sup> in relation to the Loan Product during the reporting period;</li> <li>• the number of complaints it received; and</li> <li>• include, with its report, a copy of each complaint (as defined in section 994A(1) of the Act) (to the extent permitted under privacy and other laws), or where this is not possible, report on the content of each complaint.</li> </ul>	On a quarterly basis and for each quarter as soon as practicable but no later than 10 business days following the end of the quarter.

Section 994F(6) of the Act requires distributors to notify the Issuer if they become aware of a significant dealing of the Loan Product that is not consistent with the TMD. Neither the Act nor ASIC defines when a dealing is 'significant' and distributors have discretion to apply its ordinary meaning.

The Issuer will rely on notifications of significant dealings to monitor and review the Loan Product, this TMD, and its distribution strategy, and to meet its own obligation to report significant dealings to ASIC.

Dealings outside this TMD may be significant because:

- they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the Loan Product, or
- they constitute an individual transaction which has resulted in, or will or is likely to result in, significant detriment to the consumer (or class of consumer).

In determining whether a 'significant dealing' has occurred, La Trobe Financial expects that the following non-exhaustive list of factors may be relevant for distributors:

- the nature of the Loan Product; and/or
- whether a customer outside of the target market has acquired the Loan Product; and/or
- the extent to which the acquisition of the Loan Product by the customer outside of the target market has the potential to harm or has caused harm (including the amount of any financial loss); and/or
- the nature and extent to which the distribution of the Loan Product is inconsistent with the TMD.

The above list is not exhaustive and distributors should consider, having regard to the circumstances of their business, whether other factors or events may suggest that a significant dealing has occurred. A significant dealing may be identified through the distributor's product governance arrangements, as a result of a consumer complaint or the occurrence of a Review Trigger.

## 7. Contact Us

Please contact La Trobe Financial at [targetmarketdistribution@latrobefinancial.com.au](mailto:targetmarketdistribution@latrobefinancial.com.au) with any questions or feedback with respect to this TMD.

Historical versions of this TMD and the Notice of Significant Dealing Form are available at <https://latrobefinancial.com.au/loans/residential-solutions/tmd/>.

## 8. Disclaimer

Issued by La Trobe Financial Services Pty Limited ACN 006 479 527 Australian Credit Licence No. 392385. La Trobe Financial is the Issuer's representative of the Loan Product referred to in this TMD. Terms, conditions, fees, charges and La Trobe Financial lending criteria apply.