

TARGET MARKET DETERMINATION (TMD)

Finsure Loans Max Vacant Land Specialist

Product	VACANT LAND SPECIALIST LOAN
Issuer	MA Money Financial Services Pty Ltd. ABN 64 639 174 315 Australian Credit Licence 522267
Date of TMD	17 November 2025
Acceptable borrowers	Individual borrower including individual as trustee for a trust. Individual borrowers must be Australian Citizens, New Zealand Citizens residing in Australia or Australian Permanent Resident Visa holders. Acceptable Trusts are discretionary trust; Unit Trust; Family Trust. Company borrower including company as Trustee for a Trust. Company to have no more than five (5) directors. Company must be domiciled in Australia.
Target Market	Description of target market, including likely objectives, financial situation, and needs of borrowers within the target market: The features of this product have been assessed as meeting the likely objectives, financial situation and needs of: • consumers who are seeking financing for residential vacant land. This includes financing to purchase vacant land for owner-occupied or investment purposes, refinancing existing debt, consolidating debts (excluding tax debt), and equity release ('cash out'), all secured by vacant land only. The product is not designed to finance or refinance land with ongoing construction or to develop properties. Under the terms of this product, consumers are not permitted to commence construction on the vacant land under any circumstances. This product is intended for parcels of vacant land up to 25 acres / 10 hectares. • consumers who are PAYG employed or who have been self-employed for more than 6 months (with ABN & GST registrations of more than 6 months) that have some credit impairment history; • consumers who want the flexibility to make additional repayments at no additional cost; and want the option of either principal and interest or interest only repayments; and / or • whilst variable interest rates may fluctuate, the product meets the likely objectives, financial situation and needs of consumers in the target market because it allows them to make additional repayments to reduce interest payable whilst retaining the ability to draw on those funds when required. Self-employed with limited financial information (Alternative Documentation) This product also provides access to finance for consumers who are self-employed and have limited levels of information in relation to employment and income and are therefore unable to provide the financial information necessary to access a lower interest rate. Alternative income documentation may include Accountant Letter, bank statements or Business Activity Statements (BAS).

	Classes of consumers for whom the product may be unsuitable This product may not be suitable for consumers who: - do not meet the eligibility requirements; - are seeking the certainty of fixed repayments over the term of the loan; - require a loan for construction, development purposes or to complete construction on vacant land; - require a loan to finance the acquisition of vacant land that is non residential; or - require a loan to refinance a security property that is not vacant land
Description of product, including key attributes:	This product has the following key features - Variable interest rate; - Minimum loan amount: \$100,000; - Maximum loan amount: \$1,500,000; - Loan term: 40 Years; - Type of repayment available: principal and interest/ interest only for up to 5 years then reverting to principal and interest; - Repayment frequency: monthly in arrears; - Maximum LVR: 75%; - Types of fees payable: establishment fee, valuation fee, risk fee, legal fees, monthly loan administration fee; offset account fee. - Redraw where additional repayments above the required minimum repayments are available for the consumer to withdraw and use; and - Option for sub-offset account in which available balances offset interest on the linked loan account.
Distribution	Distribution channels The product may be distributed to borrowers in the target market by: - Mortgage Brokers subject to Best Interests Duty (BID) and related obligations, who are accredited to MA Money (either direct or via an approved aggregator), Accredited Mortgage Managers; or - Direct to consumer - MA Money and affiliate corporate entities may distribute this product to consumers via an appropriately trained staff member. Distribution conditions The following conditions apply to the distribution of this product: - brokers must comply with their legal obligations, which includes the best interests duty; and - brokers, mortgage managers and aggregators must meet our accreditation or onboarding requirements which can be accessed by contacting MA Money on 1300 762 151. The distribution channels and conditions are appropriate because: - our distributors have been adequately trained to understand their DDO obligations; - all applications submitted by mortgage brokers and mortgage managers must comply with our policies and procedures, including meeting the eligibility requirements for the loan; - mortgage brokers, mortgage managers and aggregators must be appropriately authorised; and - mortgage brokers are subject to a higher duty under BID to ensure that the product is in the best interests of the particular consumer.

Review Triggers	The review triggers that would reasonably suggest that the TMD is no longer appropriate include: • A significant dealing of the product to consumers outside the target market occurs; • A significant number of complaints (>15 complaints in a calendar month) are received from consumers in relation to their purchase or use of the product; • There is a material change to the product or the terms and conditions of the product occurs which would cause the TMD to no longer be appropriate; • There are material changes to regulatory environment, including but not limited to the use of Product Intervention Powers, regulator orders or directions that affects the product; • There are high default rates (90+ days in arrears), being the higher of either >5% or 10 loans for the product; and • There are high rates of hardship, the higher of 5% or 10 loans for the product.												
Review Periods	Review date: 17 November 2025 Periodic reviews: The first review, and each ongoing review, will be completed within each consecutive 12-month period from the Review date. Trigger reviews: review to be completed within 10 business days of the identification of a trigger event.												
Distribution Information Reporting Requirements	The following information must be provided to MA Money Financial Services Pty Ltd. ABN 64 639 174 315 Australian Credit Licence 522267 by distributors who engage in retail product distribution conduct in relation to this product: <table><tr><th>Type of information</th><th>Description</th><th>Reporting period</th></tr><tr><td>Specific Complaints</td><td>Details of the complaint, including name and contact details of complainant and substance of the complaint.</td><td>As soon as practicable and within 10 business days of receipt of complaint.</td></tr><tr><td>Complaints</td><td>Number of complaints</td><td>Every 6 month period where one or more complaint is received</td></tr><tr><td>Significant dealing(s)</td><td>Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)</td><td>As soon as practicable, and in any case within 10 business days after distributor becomes aware of the significant dealing</td></tr></table>	Type of information	Description	Reporting period	Specific 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 of receipt of complaint.	Complaints	Number of complaints	Every 6 month period where one or more complaint is received	Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (eg, why it is not consistent with the TMD)	As soon as practicable, and in any case within 10 business days after distributor becomes aware of the significant dealing
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