

## TARGET MARKET DETERMINATION

### PRODUCT 1: SECURED PERSONAL LOANS (\$5,000- \$200,000)

<b>Issuer</b>	MIRACLE CAR FINANCE PTY LTD ABN (“MCF”)
<b>Issuer ABN</b>	73 121 367 226
<b>Issuer ACL</b>	389307
<b>Product 1</b>	Secured Personal Loans (“the Product”)
<b>Date initial TMD approved</b>	5 October 2021
<b>TMD Version</b>	Version 2, updated 16 March 2026
<b>TMD Status</b>	Current

### Purpose of this Document

The purpose of this Target Market Determination (“TMD”) is to comply with the Design and Distribution Obligations incorporated under Chapter 7 of the *Corporations Act 2001* (“the Act”) by the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019*.

The TMD aims to provide consumers and distributors with information about the class of consumers that comprises the target market for the Product, taking into account its objectives, financial situation and needs. It also specifies any Product distribution conditions and restrictions and deals with reviews of the TMD as well as distributor arrangements.

### Legal Disclaimer

This document is not a credit disclosure document and does not include all relevant terms and conditions associated with this Product. It does not take into account any person’s individual objectives, financial situation or needs. Individuals interested in making use of this Product should carefully read MCF’s Credit Guide and any other disclosure documents before making a decision whether to use this Product.

### Description of Target Market

This section is required under section 994B(5)(b) of the Act.

## **Target Market Summary**

This Product is likely to be appropriate for a consumer who is seeking an amount of credit from \$5,000 - \$200,000, repayable over a period of 12 – 84 months, to purchase a motor vehicle or other personal property for the primary purpose of personal use, typically secured by a personal property asset.

The target market has been established by assessing the Product (including its key attributes detailed below) and the consumer objectives, financial situation and needs for which the Product is likely to be appropriate. The class of consumers who fall within the target market for the Product is described below, based on the objectives, financial situation and needs of the consumer and the key attributes of the Product.

### **The key and Product attributes of MCF's Secured Personal Loans are:**

Loan Term: 12 – 84 months

Credit available (subject to meeting eligibility requirements): From \$5,000 - \$200,000

Establishment Fee: \$895-\$1,095

Brokerage (if applicable): 10% of loan value (max \$2,500)

Monthly Administration Fee: \$10

Interest Rate: 11.98%-28.98%

Early Termination Fee: Nil

Security required: Acceptable security assets typically include, but are not limited to, motor vehicles and motorcycles.

### **Description of Consumer Objectives, Financial Situation and Needs**

This Product is suitable for persons who:

- are aged 18 years or older.
- wish to borrow up to \$200,000 to purchase a motor vehicle or other personal property for primarily personal use and are able to provide security.
- wish to repay the secured loan within 12 – 84 months.
- have an ongoing income source to support the agreed repayment and are not expecting their financial situation to change in the immediate future where it may impact their ability to pay.

- derive benefit from the purchase for primarily personal use purpose.
- are able to service the loan, establishment fee and monthly fees as they accrue.
- hold an Australian bank account that is linked to internet banking.
- are Australian Citizens, Australian permanent residents or temporary visa holder holding a qualifying valid visa for the required period.
- have at least 90 days of bank statements available.

### **Excluded Classes of Consumers**

This Product is unsuitable for persons:

- who do not qualify under the responsible lending requirements imposed by the *National Consumer Credit Protection Act 2009* (“National Credit Act”), will be unable to comply with their financial obligations under the Product terms, or could only comply with substantial hardship.
- who are currently bankrupt, or unlicensed drivers relevant to the item being financed that may indicate the Product is unlikely to meet the consumer class objectives.
- for whom the Product will not meet their requirements or needs.
- under 18 years of age, or temporary residents with an unsuitable visa or a visa with insufficient time remaining under their visa.
- who are currently bankrupt, or currently subject to Part 9 or 10 arrangements or disqualification, or unlicensed drivers relevant to the item being financed that may indicate the Product is unlikely to meet the consumer class objectives.
- whose financial situation and needs cannot be substantiated.
- who do not hold an Australian bank account, or do not have 90 days of bank statements available.
- Who want to use the vehicle for business purposes.

### **Description of Product and Key Attributes**

The key attributes of this Product are:

- secured personal loans from \$5,000 - \$200,000.
- a loan period of between 12 - 84 months.

- suitable for qualifying consumers who have the financial capacity to pay the fees and principal repayments as they fall due.
- suitable for qualifying consumers who have the ability to make additional and early payments on the loan with no early repayment fees or early termination fees.
- fees and interest are payable in respect of the Product and include an upfront Establishment Fee of \$895-\$1,095, a Monthly Administration Fee of \$10, and interest of 11.98%-28.98%.

### **Product and Target Market Consistency**

The Product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market based on the following:

- The assessment that the Product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market is based on an analysis of the attributes and characteristics of the Product and establishing that they are consistent with the likely requirements of consumers in the target market.
- The secured consumer loan Product has been designed to suit a wide target market of consumers who require access to funds up to \$200,000 for the purchase of an asset for personal use (primarily motor vehicles) and are able to provide security.
- Consumers in this class typically require access to credit particularly to obtain transport, to increase their employment opportunities and/or enhance their lifestyle overall.

### **Distribution Conditions and Restrictions**

This section is required under s994B(5)(c).

#### **Distribution Methods**

This Product is distributed through the following channels:

- Through MCF's website online at <https://miraclecarfinance.com.au/>.
- Through approved broker referral partners who are appropriately licensed to provide credit assistance in relation to the Product;
- By in person contact at the MCF office; and
- By persons contacting the MCF office by telephone or email.

MCF does not currently have external distributors or credit representatives.

### **Distribution Conditions**

This Product is distributed subject to the following conditions and requirements:

- Providing specific content about the Product on MCF's website, including lending guidelines, targeting individuals that have the appropriate borrowing capacity.
- Providing specific information about the key product attributes and eligibility requirements through online and telephonic communication.
- Providing specific information about the key product attributes and eligibility requirements through in person enquiries made to the MCF office.
- Providing specific information about the key product attributes and eligibility requirements through approved broker referral partners.

### **Factors Considered**

In assessing the appropriateness of the distribution methods, conditions and restrictions, MCF has taken into account the following factors:

- The comparatively wide target market for the Product.
- MCF's ability to restrict distribution by providing sufficient lending guidelines and eligibility requirements.
- MCF's ability to manage the distribution channels.
- MCF's personal contact with the majority of prospective customers.
- Ensuring that broker referral partners are appropriately licensed to provide credit assistance in relation to the Product.
- The capability of existing distribution methods to reach the intended target markets, based on past outcomes.
- The integrity of existing and prospective distribution methods.

### **Reviewing the TMD**

MCF will review this TMD as follows:

#### **Review Triggers**

This part is required under section 994B(5)(d) of the Act.

If events or circumstances occur that would reasonably suggest that the TMD is no longer appropriate MCF will review the TMD. This may include:

- an event or circumstance that would materially change a factor taken into account in making the target market determination for the Product, e.g. an external event such as a change in regulation or a substantial change in government benefits schemes rules resulting in reduced consumer income.
- a material change to the design or distribution of the Product.
- a significant dealing in the Product that is not consistent with a Product's TMD.
- the nature and extent of any feedback received from distributors or users of the Product, e.g. significant changes in customer complaints or loan default rates.
- experiencing significant regulatory issues with industry bodies or government entities.

### **Mandatory Review Periods**

This part is required under section 994B(5)(e) and (f) of the Act.

**Initial Review:** This TMD will be reviewed within 1 year of the TMD approved date.

**Periodic Reviews:** This TMD will be reviewed at least every 1 year from the initial review date.

### **Distributors: Reporting & Required Information**

This part is required under s994B(5)(g) & (h).

MCF does not currently have external distributors or credit representatives, apart from receiving approved broker referrals, but is aware of the requirements for distributors regarding complaints and significant dealings where applicable.

#### **Complaints**

Distributors are required to report and detail in writing all complaints in relation to the Product covered by this TMD to MCF as soon as practicable, but not later than every 6 months.

#### **Significant Dealings**

Distributors are required to report any significant dealing in the Product that is not consistent with this TMD to MCF within 10 business days.

## **Appropriateness of the TMD**

This section is required under s994B(5)(c) and s994B(8)(a) &(b).

MCF has reviewed the Product and its key attributes by considering its purpose, past outcomes and likely future outcomes, and has reasonably concluded that the Product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described above, when offered to the consumer in accordance with the distribution conditions listed above. The comparatively wide target market and limited distribution channels of MCF have been factors in assessing why the distribution conditions and restrictions will make it likely that consumers who purchase the Product are in the class of consumers for which it has been designed.

MCF considers that the distribution conditions make it likely that consumers who acquire the Product will be in the target market because:

- the Product can only be distributed by MCF to consumers who meet the eligibility criteria and are within the target market, and in compliance with relevant laws; and
- MCF has procedures and processes in place to ensure that applicants who do not meet the eligibility criteria and who do not fall within the target market will not be approved for the Product.