

Target Market Determination: Shared Ownership Home Loan

What's a Target Market Determination?

A Target Market Determination (TMD) is a written document that describes the target market for a product (ie, who a product is appropriate for), the key attributes of a product and how a product is being distributed. A TMD also sets out when reviews need to be conducted and the relevant information that is needed by distributors of the products to identify the need for a review. A TMD is not a determination that any person is within the target market for a product. A TMD does not summarise all terms, criteria or obligations associated with a product. For more information about TMDs go to <u>Target Market Determination</u> | Keystart. For more information about our shared ownership home loans go to <u>Shared Ownership Home Loan (keystart.com.au)</u>.

TMDs keep customers at the centre of our approach to the design and distribution of our financial products.

#	Criteria	Responses for this product		
1	Issuer	Keystart Loans Ltd ACN 009 427 034 (Australian credit licence number 381437) as trustee for the Keystart Housing Scheme Trust		
2	Date this TMD is made	4 July 2024		
	Product name	Shared Ownership Home Loans		
		Loan types	SharedStart Home Loan	
3			GoodStart Home Loan	
			Sole Parent Home Loan	
			Access Home Loan	
			Aboriginal Home Loan (Shared Ownership)	



4 Product Description, including key attributes

Objective for all Shared Ownership Home Loans

Loan to assist customers who are unable to afford a home loan to purchase a 100% share of a property, as they are facing either a deposit or repayment barrier or both. Repayment barrier refers to the affordability of a loan relative to a customer's borrowing capacity.

<u>Product Eligibility for all Shared Ownership Home Loans</u>

Only available to people wanting to live in and own a home in Western Australia.

You are unable to fund a home loan for the full ownership of a property.

The income limit is based on the income required for either a single person or a couple/family to service a low deposit loan on a property valued at the Perth lower quartile house price.

Specific Loan Type Eligibility

Loan types	Specific Eligibility	Property Price Limits
SharedStart Home Loan	Shared Ownership properties for purchase are listed on the Opening Doors website.	There is no property purchase price limit placed on the properties on this website.
GoodStart Home Loan	you are currently living in public housing and wanting to buy the home you are living in.	In these specific circumstances, you may be able to purchase established properties other than those available on the Opening Doors website. For these specific circumstances, the property purchase price limit is set at the lower quartile house price for Perth, based on Real Estate Institute of Western Australia's (REIWA) annualised house price data. This methodology does not apply to properties in the Kimberley and Pilbara regions.
Sole Parent Home Loan	you are a sole parent wanting to keep your family home after a relationship breakdown or death of a partner.	
Access Home Loan	you have a permanent disability, or you care for a dependent with a permanent disability that affects your housing needs.	
Aboriginal Home Loan (Shared Ownership)	you are of Aboriginal or Torres Strait Islander descent wanting to share ownership of a property.	



Loan Attributes for all Shared Ownership Home Loans

Low entry costs: low deposit and no lender's mortgage insurance to allow entry into home ownership sooner.

Western Australian Housing Authority will co-own a share of the property, which lowers the loan amount and reduces the ongoing monthly repayments. The Housing Authority's share in the property is dependent on the different shared ownership sub-products (up to a maximum of 40% share of the property which is subject to a maximum value of \$211,000).

No monthly account keeping fees.

Weekly, fortnightly and monthly payment frequency options available.

Standard variable interest rate based on the Reserve Bank of Australia's (RBA) cash rate plus a margin. This margin is subject to change. As a variable rate, the rate can go up or down over time in line with any movement to the RBA cash rate and any changes to the margin. Given the low deposit nature of its home loan lending, Keystart's interest rates policy enables it to manage lending risk responsibly.

Ability to make additional repayments at no extra cost.

Either a flexible or fixed shared ownership type:

- Flexible shared ownership customers can refinance or purchase more shares in the property when they are in a financial position to do so.
- Fixed shared ownership customers are unable to purchase further shares in the property.

Up to maximum 30-year term.

Maximum loan amount as determined by Housing Authority.

5 Description of the retail class that comprises the target market

The product has been assessed as meeting the likely objectives, financial situation and needs of customers who:

- satisfy our eligibility criteria.
- don't have the deposit required by other lenders.
- don't want to pay lenders mortgage insurance.
- want the ability to share the costs of buying or retaining a home with a third-party permitting the purchase of a house that they would not otherwise be unable to purchase.
- want to purchase an owner-occupied home in Western Australia that is available as security.
- require flexibility including:
 - ability to pay off the loan as quickly as possible and increase equity in the home by making additional payments at no extra cost.



- o access additional payments through a redraw for fully funded loans (only applicable in certain circumstances).
- o have the ability to progressively drawdown loan to fund home construction and minimise repayments during the construction (*where applicable*).
- o interest being variable meaning it may increase or decrease.

This product meets the likely objectives, financial situation and needs of consumers in the target market because it enables consumers in the target market to:

- purchase an owner occupied home sooner by:
 - o lowering the entry costs with low deposit requirements and no lender's mortgage insurance; and
 - o reducing the ongoing monthly repayment obligations by reducing the loan amount due to the ability of coownership of the property with the Western Australian Housing Authority
- for fully funded loans, build equity in their property by making principal and interest repayments, including additional repayments at no extra cost.

6 Negative target market

This product may not be suitable for customers who:

- are wanting and able to afford the full ownership in a property.
- are investors.
- require a fixed interest rate.
- require a general redraw facility or an offset account.
- require a guarantor for the loan.
- are living outside Western Australia.
- are looking for a house valued above the lower quartile house price.
- do not otherwise satisfy our eligibility criteria.



7 Description of distribution conditions and restrictions

Distribution Methods:

Direct (online, in-person or by phone):

Keystart's contact centre team take direct calls and walk ins from potential applicants. Our home loan specialists and dedicated Aboriginal Liaison Team also attend seminars and presentations to provide general information about Keystart's products. Only our home loan specialists assist applicants with applying for our home loan products. Home loan specialists have the necessary training, skills and knowledge to assess whether the consumer is within the target market.

Distribution Conditions:

Direct (online, in-person or by phone):

- Adequate and ongoing training to our customer facing staff on the promotion and distribution of our products in accordance with our target market determination
- A consistent channel for complaints is publicly available
- No incentives or commission paid to our home loan specialists
- Our team is monitored via specific KPIs, e.g., deferral rates and net promotor score.

8 Review triggers

A review will be triggered if:

- a significant dealing of the product to consumers outside the target market occurs.
- a significant increase, beyond expected levels, in the number of complaints or disputes received from customers in relation to the product (i.e. 10% increase compared to expected levels); a significant number of customers are in default at the early stages of the loan.
- a significant number of hardship applications occur due to customers being outside of the target market of the product (i.e. over 10% of all hardship applications).
- a material change to the product or the terms and conditions of the product or the distribution of the product occurs, which would cause this Target Market Determination to no longer be appropriate.
- there are changes in law or its application, relevant industry codes, AFCA determinations, court decisions or regulatory guidance.

9 Review Periods

Periodic reviews: to be completed at least every 24 months from the date of the previous review.

Review triggers: to be completed within 10 business days of a review trigger occurring that reasonable suggests that the TMD is no longer appropriate.



10 Distribution **Information Reporting** Requirements

The following information must be provided to the complaints management team by distributors who engage in retail product distribution conduct in relation to this product:

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 3 months
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 becoming aware