

## Target Market Determinations- Brighten SMSF Residential Loan

### Legal Disclaimer:

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). It sets out the class of customers for whom the product, including its key attributes, would likely be consistent with their likely objectives, financial situation and needs. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of Brighten Home Loans Pty Ltd ACN 620 839 983 (**Brighten**) design and distribution arrangements for the product.

This document is not a Product Disclosure Statement (**PDS**) and is not a summary of the product features or terms of the product. The information contained in this TMD does not take into account any person's individual objectives, financial situation or needs.

<b>Product</b>	Brighten SMSF Residential Loan
<b>Issuer</b>	Brighten Home Loans Pty Ltd ACN 620 839 983
<b>Date of TMD</b>	22 October 2025
<b>Target Market</b>	<p><b>Description of target market</b></p> <p>This product is suitable for trustees who operate a compliant self-managed superannuation fund in accordance with the <i>Superannuation Industry (Supervision) Act 1993</i> (Cth) and want a loan to purchase, or refinance, a residential investment property.</p> <p>The product is suitable for customers who:</p> <ul style="list-style-type: none"><li>• are corporate or individual trustees of a self-managed superannuation fund (SMSF)</li><li>• are 18 years of age or over</li><li>• includes at least one member who is in accumulation phase</li><li>• are Australian or New Zealand citizens or permanent residents</li><li>• have appointed a non-trading corporate trustee to act as the legal owner and security trustee of the proposed property</li><li>• require finance for the acquisition, or refinance, of a residential investment property</li><li>• meet loan eligibility criteria including credit and serviceability assessment, and AML/CTF requirements</li></ul> <p><b>Classes of customers for whom the product is clearly unsuitable</b></p> <p>This product is unlikely to meet the needs, objectives and financial situation of customers who:</p> <ul style="list-style-type: none"><li>• are not a self-managed superannuation fund (SMSF)</li><li>• require a loan for a property for personal use</li><li>• require a construction loan</li><li>• require a fixed rate loan</li><li>• require a loan term of less than 10 years or greater than 30 years</li><li>• require a loan amount of less than \$250,000 or greater than \$3 million</li><li>• require redraw or loan offset facilities</li><li>• cannot demonstrate they can make regular repayments over a sustained period</li><li>• do not meet Brighten's credit or eligibility criteria</li></ul> <p><b>Product Description, including key attributes</b></p> <p>This product has the following key features:</p> <ul style="list-style-type: none"><li>• variable interest rate loan where the rate can change at any time during the term</li><li>• minimum loan amount of \$250,000 and a maximum of \$3 million</li><li>• minimum loan term of 10 years and a maximum of 30 years</li></ul>

	<ul style="list-style-type: none"> <li>maximum loan to value ratio (LVR) of 80%</li> <li>Principal and Interest repayment, or Interest Only repayment up to a maximum of 5 years, subject to a lending assessment</li> <li>repayment frequency for Principal and Interest repayments include weekly, fortnightly or monthly</li> <li>repayment frequency for Interest Only repayments is monthly</li> <li>additional or lump sum repayments are permitted</li> <li>fees and charges payable may include valuation fees, settlement fees, legal fees, discharge fees, early termination fee (if applicable), other fees and charges as set out in the loan contract</li> </ul>												
<b>Distribution Conditions</b>	<p><b><i>Distribution channels</i></b></p> <p>This product is designed to be distributed through third party distributors being accredited and licensed independent mortgage brokers, aggregator panels/networks and/or white label partners pursuant to specific agreements (<b>Distribution Partners</b>).</p> <p><b><i>Distribution conditions</i></b></p> <p>The Distribution Partners are appropriately accredited and licensed to distribute the product to customers who are in the target market.</p> <p>The distribution channels and conditions are appropriate because:</p> <ul style="list-style-type: none"> <li>Distribution Partners must comply with licensing and legislative requirements to ensure the product provided is in the best interests of each customer.</li> <li>Brighten monitors application quality received from Distribution Partners, tracking trends that indicate poor practices, incomplete applications, or inadequate assessments.</li> <li>All Distribution Partner agreements include commission or fee clawback clauses poor performing loans, fraud, AML/CTF breaches, and other unacceptable practices.</li> </ul>												
<b>Review Periods</b>	<p><b><i>First review date:</i></b> 22 October 2026</p> <p><b><i>Periodic reviews:</i></b> Every 12 months or within 10 business days of a Review Trigger being identified.</p>												
<b>Review Triggers</b>	<p>The review triggers that would reasonably suggest the TMD is no longer appropriate include:</p> <ul style="list-style-type: none"> <li>A material change to the product or the terms and conditions of the product.</li> <li>A significant dealing of the product to customers outside the target market occurs.</li> <li>Changes to the regulatory environment or relevant legislation which materially impacts upon the design and distribution of the product.</li> <li>A material increase in customer complaints about the product or Distribution Partner conduct.</li> <li>Default or hardship rates exceed expected levels for the product.</li> <li>A material or unexpected decline in applications from the target market.</li> <li>A material or unexpected increase of customers seeking to switch to other products.</li> <li>A notification from a regulator in relation to the distribution of the product.</li> </ul>												
<b>Distribution Information Reporting Requirements</b>	<p>Distribution Partners must provide the following information to Brighten:</p> <table border="1"> <thead> <tr> <th><u>Type of Information</u></th> <th><u>Description</u></th> <th><u>Reporting period</u></th> </tr> </thead> <tbody> <tr> <td><b>Customer Complaints</b></td> <td>Number of complaints received in relation to the product.</td> <td>Every 6 months</td> </tr> <tr> <td><b>Broker Complaints</b></td> <td>The extent and the nature of the complaints received from brokers about difficulty in selling to the targets market.</td> <td>Every 6 months</td> </tr> <tr> <td><b>Significant dealing(s)</b></td> <td>Date or date range of the significant dealing(s) and description of the significant dealing (i.e. why it is not consistent with the TMD).</td> <td>As soon as practicable</td> </tr> </tbody> </table>	<u>Type of Information</u>	<u>Description</u>	<u>Reporting period</u>	<b>Customer Complaints</b>	Number of complaints received in relation to the product.	Every 6 months	<b>Broker Complaints</b>	The extent and the nature of the complaints received from brokers about difficulty in selling to the targets market.	Every 6 months	<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (i.e. why it is not consistent with the TMD).	As soon as practicable
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