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.

	Distribution of the state		
Product	Brighten SMSF Residential Loan		
Issuer	Brighten Home Loans Pty Ltd ACN 620 839 983		
Date of TMD	22 October 2025		
Target Market	Description of target market		
	This product is suitable for trustees who operate a compliant self-managed superannuation fund in accordance with the <i>Superannuation Industry (Supervision) Act 1993 (Cth)</i> and want a loan to purchase, or refinance, a residential investment property.		
	The product is suitable for customers who:		
	are corporate or individual trustees of a self-managed superannuation fund (SMSF)		
	are 18 years of age or over		
	includes at least one member who is in accumulation phase Australian an New Zaaland attitude and appropriate and accumulation phase.		
	 are Australian or New Zealand citizens or permanent residents have appointed a non-trading corporate trustee to act as the legal owner and security trustee of the proposed property 		
	require finance for the acquisition, or refinance, of a residential investment property		
	 meet loan eligibility criteria including credit and serviceability assessment, and AML/CTF requirements 		
	Classes of customers for whom the product is clearly unsuitable		
	This product is unlikely to meet the needs, objectives and financial situation of customers who:		
	are not a self-managed superannuation fund (SMSF)		
	require a loan for a property for personal use		
	 require a construction loan require a fixed rate loan 		
	 require a fixed rate loan require a loan term of less than 10 years or greater than 30 years 		
	require a loan amount of less than \$250,000 or greater than \$3 million		
	require redraw or loan offset facilities		
	cannot demonstrate they can make regular repayments over a sustained period		
	do not meet Brighten's credit or eligibility criteria		
	Product Description, including key attributes		
	This product has the following key features: • variable interest rate loan where the rate can change at any time during the term		
	 minimum loan amount of \$250,000 and a maximum of \$3 million minimum loan term of 10 years and a maximum of 30 years 		

- maximum loan to value ratio (LVR) of 80%
- Principal and Interest repayment, or Interest Only repayment up to a maximum of 5 years, subject to a lending assessment
- repayment frequency for Principal and Interest repayments include weekly, fortnightly or monthly
- repayment frequency for Interest Only repayments is monthly
- additional or lump sum repayments are permitted
- fees and charges payable may include valuation fees, settlement fees, legal fees, discharge fees, early termination fee (if applicable), other fees and changes as set out in the loan contract

Distribution Conditions

Distribution channels

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 (**Distribution Partners**).

Distribution conditions

The Distribution Partners are appropriately accredited and licensed to distribute the product to customers who are in the target market.

The distribution channels and conditions are appropriate because:

- Distribution Partners must comply with licensing and legislative requirements to ensure the product provided is in the best interests of each customer.
- Brighten monitors application quality received from Distribution Partners, tracking trends that indicate poor practices, incomplete applications, or inadequate assessments.
- All Distribution Partner agreements include commission or fee clawback clauses poor performing loans, fraud, AML/CTF breaches, and other unacceptable practices.

Review Periods

First review date: 22 October 2026

Periodic reviews: Every 12 months or within 10 business days of a Review Trigger being identified.

Review Triggers

The review triggers that would reasonably suggest the TMD is no longer appropriate include:

- A material change to the product or the terms and conditions of the product.
- A significant dealing of the product to customers outside the target market occurs.
- Changes to the regulatory environment or relevant legislation which materially impacts upon the design and distribution of the product.
- A material increase in customer complaints about the product or Distribution Partner conduct.
- Default or hardship rates exceed expected levels for the product.
- A material or unexpected decline in applications from the target market.
- A material or unexpected increase of customers seeking to switch to other products.
- A notification from a regulator in relation to the distribution of the product.

Distribution Information Reporting Requirements

Distribution Partners must provide the following information to Brighten:

Type of Information	<u>Description</u>	Reporting period
Customer Complaints	Number of complaints received in relation to the product.	Every 6 months
Broker Complaints	The extent and the nature of the complaints received from brokers about difficulty in selling to the targets market.	Every 6 months
Significant dealing(s)	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