



Basic Variable Loan Target Market Determination

About this document

The purpose of this Target Market Determination (TMD) document is to provide an understanding of:

- the types of customers the products have been designed for, having regard to their likely needs, objectives and financial situation;
- how the products will be distributed;
- what information is required to support monitoring the distribution of the product; and
- when this document will be reviewed.

This document does not constitute an offer or financial advice. Customers should consider the relevant product terms and conditions and any other relevant disclosure documents, available on our website, and their own personal circumstances, before making a decision about this product.

Basic Variable Loan

Our Basic Variable Loans have been designed to meet the likely needs, objectives and financial situation of home buyers and investors, looking to purchase or refinance an established residential property or to construct or renovate a new home or investment property.

Customers in the target market may or may not have already owned real property and obtained a home loan in the past or may be buying a property and obtaining a home loan for the first time. Customers will therefore have differing levels of knowledge and experience with home loans, including, potentially, very little or no such experience.

This TMD sets out the target markets for our:

- Basic Variable Home Loan
- Basic Variable Investment Loan
- Basic Variable Construction Loan (Owner Occupied)
- Basic Variable Construction Loan (Investment)

Target Market Objectives, Needs and Financial Situation	Key Attributes
Description of objective/need/financial situation	Key product attribute that aligns to this
Purchasing, refinancing, building or renovating a residential owner occupied or investment property	The loan amount can be used for any one or more of the listed purposes.
Repay over a period of time with repayments that can vary over the life of the loan	Variable interest rate with terms between 1 and 30 years.
Ability to make and access additional repayments	Unlimited extra repayments and access these funds via a redraw facility.
Minimising loan fees	Pay no loan application fee or ongoing monthly loan administration fees. A monthly administration fee (charged to the loan account) applies to certain 'Legacy' Basic Variable Home loans for an offset account linked to the loan.
Reducing interest payable through the use of a linked offset account	Have an offset facility linked to the loan.
Ability to choose an interest only repayment structure for a limited period	Select interest only repayment structure for a limited period (Investment loans only) or have an interest only repayment option for a maximum of 24 months during construction period (Construction loans only).

People First Bank, a trading name of Heritage and People's Choice Ltd. ABN 11 087 651 125, Australian Financial Services Licence 244310 and Australian Credit Licence 244310.

Effective: 05 May 2026
Status: Current

We consider that the product is appropriate for the target market on the basis that the key attributes of the product listed in this determination directly address the objectives, financial situation and needs of consumers in the target market as described in this determination.

Distribution conditions

The table below identifies the distribution channels through which this product can be distributed and includes the conditions that apply to each channel. The conditions listed are considered appropriate to ensure that the Basic Variable Loan will likely be distributed to customers in the target market who qualify for the product in accordance with our application and assessment criteria, and in a way which complies with relevant laws and lending guidelines.

Distribution Channel	Conditions that make the distribution channel appropriate
<i>Describe distribution channel</i>	<i>Describe conditions / appropriateness of the channel</i>
Staff assisted channels including branches, advice centres, contact centres	<ul style="list-style-type: none"> Staff are appropriately trained as home loan lenders and are able to discuss the product features including eligibility requirements. Staff are able to identify the key difference between the product and other home loan products available using marketing and disclosure materials.
Accredited third-party distributors (Mortgage Brokers)	<ul style="list-style-type: none"> Third parties who distribute products must hold an Australian Financial Services Licence (AFSL) and / or Australian Credit Licence (ACL). Third parties must supply their accreditations and undertake onboarding and ongoing training. Third parties are subject to the best interests duty when providing credit assistance.

Review triggers

We will review the TMD within 10 business days of us becoming aware of any of the following events or circumstances that reasonably suggests that this TMD is no longer appropriate;

Complaints	Material complaints in relation to the terms of this product and / or the distribution conduct.
Product Performance	Material changes in product performance metrics that may suggest that the product is not appropriate for the target market or has been distributed not in accordance with the TMD. This may include (but is not limited to): <ul style="list-style-type: none"> Significant reduction in new accounts opened. An increase in accounts closed soon after product issuance. Increased incidences of customers entering arrears shortly after the loan is originated.
Substantial product / distribution change	<ul style="list-style-type: none"> Material changes to the product terms and conditions, and any other supplementary documents, other than changes to interest rates and consequential changes to repayments. Material changes to the distribution conditions, or where the distribution conditions are no longer appropriate.
Significant dealing	Information about any significant dealing in the product that is not consistent with the target market determination.
Notification from ASIC	A notification from ASIC requiring immediate cessation of product distribution or particular conduct in relation to the product.

Reporting

We will produce and review, at least quarterly, reports in relation to the products detailing sales, any complaints received, and any occasions where it appears that the products may have been distributed inconsistently with this TMD, to ensure appropriate oversight and monitoring of the distribution of the products.

Distributors

Our third party distributors are required to provide the following information on a six-monthly basis within 10 business days of the end of the reporting period.

Complaints	Details of any complaints received by the distributor about the products and / or their distribution.
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Significant Dealing

Material changes in product performance metrics that may suggest that the product is not appropriate for the target market or has been distributed not in accordance with the TMD.

Review Periods

We will review this Target Market Determination in accordance with the table below, to ensure that it remains appropriate.

Initial Review Period:

Within 12 months of the effective date.

Ongoing Review Period:

At least every 2 years from the last review.