

## TARGET MARKET DETERMINATION

### PRODUCT 1: MEDIUM AMOUNT CREDIT CONTRACT (MACC)

<b>Issuer</b>	VIVA UNITY PTY LTD ATF COETZEE GROUP TRADING TRUST T/A EFT CAPITAL (“EFT CAPITAL”)
<b>Issuer ABN</b>	55 493 287 124
<b>Issuer ACL</b>	389222
<b>Product 1</b>	Medium Amount Credit Contract (MACC) (“the Product”)
<b>Date initial TMD approved</b>	5 October 2021
<b>TMD Version</b>	Version 2, updated 12 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 EFT CAPITAL’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, and qualifying for, fast, unsecured short-term finance from \$2,001 - \$5,000 to be used for an emergency, to meet an unexpected expense or to make a discretionary purchase, to be repaid over 26 - 156 weeks.

The target market has been established by assessing the Product (including its key attributes) 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.

#### Description of Consumer Objectives, Financial situation and Needs

This product is suitable for persons who:

- wish to borrow \$2,001 - \$5,000 for a personal purpose without providing security.
- earn income as an employee, or are self-employed and earn regular income or

receive regular Government Benefit payments and meet the EFT CAPITAL lending requirements.

- receive a minimum gross income of \$2,600 per month.
- wish to borrow funds short term between 26 – 156 weeks.
- have the financial capacity to pay the fees and principal repayments as they fall due.
- hold an Australian bank account.
- are an Australian Citizen, permanent Australian resident or qualifying visa holder.

### 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 its financial obligations under the Product terms, or could only comply with substantial hardship.
- Who do not earn income as an employee, or are self-employed and earn regular income or receive regular Government Benefit payments and do not meet the EFT CAPITAL lending requirements.
- for whom the Product will not meet their requirements or needs.
- who require funds to pay basic living expenses or other forms of credit.
- who gamble excessively.
- who wish to borrow funds for fewer than 26 or more than 156 weeks.
- who wish to borrow more than \$5,000 or less than \$2,001.
- who do not have the financial capacity to pay the fees and principal repayments as they fall due.
- who do not hold an Australian bank account.
- who are not an Australian Citizen, permanent Australian resident or qualifying visa holder.

### Description of Product and Key Attributes

The key attributes of this product are:

- unsecured short-term personal loans from \$2,001 - \$5,000.
- a loan period of 26 - 156 weeks.
- suitable for qualifying consumers who have the financial capacity to pay the fees and principal repayments as they fall due.
- the ability to make additional and early payments on the loan with no early repayment fees or early termination fees.
- fees, costs and interest are payable in respect of the Product and include an upfront establishment fee of \$400, interest at a rate of 48% per annum on the loan amount and a dishonour fee of \$10 for a missed payment.

### 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.

## Distribution Conditions and Restrictions

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

### Distribution Methods

This product is distributed through the following channels:

- Online through EFT CAPITAL website at <https://eftcapital.com.au/>;
- Through approved referral partners; and
- By persons telephonically contacting the EFT CAPITAL office.

EFT CAPITAL does not make use of external credit representatives or distributors.

### Distribution Conditions

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

- Providing specific content about the Product on EFT CAPITAL'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 telephonic enquiries made to the EFT CAPITAL office.
- Providing specific information about the key product attributes and eligibility requirements through approved referral partners.

### Factors Considered

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

- The comparatively wide target market for the Product.
- EFT CAPITAL's ability to restrict distribution by providing sufficient lending guidelines and eligibility requirements.
- EFT CAPITAL's ability to manage the distribution channels.
- EFT CAPITAL's lack of external distributors.
- 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

EFT CAPITAL 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 EFT CAPITAL 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).

EFT CAPITAL does not make use of external distributors.

#### **Complaints**

Distributors (where applicable) are required to report and detail in writing all complaints in relation to the Product covered by this TMD to EFT CAPITAL every 6 months.

#### **Significant Dealings**

Distributors (where applicable) are required to report any significant dealing in the Product that is not consistent with this TMD, within 10 business days.

#### **Appropriateness of the TMD**

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

EFT CAPITAL 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 EFT CAPITAL 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.

## TARGET MARKET DETERMINATION

### PRODUCT 2: UNSECURED PERSONAL LOANS OVER \$5,000

<b>Issuer</b>	VIVA UNITY PTY LTD ATF COETZEE GROUP TRADING TRUST T/A EFT CAPITAL (“EFT CAPITAL”)
<b>Issuer ABN</b>	55 493 287 124
<b>Issuer ACL</b>	389222
<b>Product 2</b>	Unsecured Personal Loan (“the Product”)
<b>Date initial TMD approved</b>	5 October 2021
<b>TMD Version</b>	Version 2, updated 12 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 EFT CAPITAL’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, and qualifying for, fast, unsecured short-term finance from \$5,001 - \$20,000 to be used for an emergency, to meet an unexpected expense or to make a discretionary purchase, to be repaid over 52 - 156 weeks.

The target market has been established by assessing the Product (including its key attributes) 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.

#### Description of Consumer Objectives, Financial situation and Needs

This product is suitable for persons who:

- wish to borrow \$5,001 - \$20,000 for a personal purpose without providing security.
- earn income as an employee, or are self-employed and earn regular income or receive regular Government Benefit payments and meet the EFT CAPITAL lending requirements.

- receive a minimum gross income of \$3,000 per month.
- wish to borrow funds short term from 52 – 156 weeks.
- have the financial capacity to pay the fees and principal repayments as they fall due.
- hold an Australian bank account.
- are an Australian Citizen, permanent Australian resident or qualifying visa holder.

### 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 its financial obligations under the Product terms, or could only comply with substantial hardship.
- Who do not earn income as an employee, or are self-employed and earn regular income or receive regular Government Benefit payments and do not meet the EFT CAPITAL lending requirements.
- for whom the Product will not meet their requirements or needs.
- who require funds to pay basic living expenses or other forms of credit.
- who gamble excessively.
- who wish to borrow funds for fewer than 52 or more than 156 weeks.
- who wish to borrow more than \$20,000 or less than \$5,001.
- who do not have the financial capacity to pay the fees and principal repayments as they fall due.
- who do not hold an Australian bank account.
- who are not an Australian Citizen, permanent Australian resident or qualifying visa holder.

### Description of Product and Key Attributes

The key attributes of this product are:

- unsecured short-term personal loans from \$5,001 - \$20,000.
- a loan period of 52-156 weeks.
- suitable for qualifying consumers who have the financial capacity to pay the fees and principal repayments as they fall due.
- 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 interest at a rate of 48% per annum on the loan amount and a dishonour fee of \$10 for a missed payment.

### 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.

## Distribution Conditions and Restrictions

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

### Distribution Methods

This product is distributed through the following channels:

- Online through EFT CAPITAL website at <https://eftcapital.com.au/>;
- Through approved referral partners; and
- By persons telephonically contacting the EFT CAPITAL office.

EFT CAPITAL does not make use of external credit representatives or distributors.

### Distribution Conditions

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

- Providing specific content about the Product on EFT CAPITAL'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 telephonic enquiries made to the EFT CAPITAL office.
- Providing specific information about the key product attributes and eligibility requirements through approved referral partners.

### Factors Considered

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

- The comparatively wide target market for the Product.
- EFT CAPITAL's ability to restrict distribution by providing sufficient lending guidelines and eligibility requirements.
- EFT CAPITAL's ability to manage the distribution channels.
- EFT CAPITAL's lack of external distributors.
- 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

EFT CAPITAL 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 EFT CAPITAL 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).

EFT CAPITAL does not make use of external distributors.

### **Complaints**

Distributors (where applicable) are required to report and detail in writing all complaints in relation to the Product covered by this TMD to EFT CAPITAL every 6 months.

### **Significant Dealings**

Distributors (where applicable) are required to report any significant dealing in the Product that is not consistent with this TMD, within 10 business days.

### **Appropriateness of the TMD**

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

EFT CAPITAL 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 EFT CAPITAL 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.

## TARGET MARKET DETERMINATION

### PRODUCT 3: SECURED PERSONAL LOANS (UP TO \$20,000)

<b>Issuer</b>	VIVA UNITY PTY LTD ATF COETZEE GROUP TRADING TRUST T/A EFT CAPITAL (“EFT CAPITAL”)
<b>Issuer ABN</b>	55 493 287 124
<b>Issuer ACL</b>	389222
<b>Product 3</b>	Secured Personal Loans (“the Product”)
<b>Date initial TMD approved</b>	5 October 2021
<b>TMD Version</b>	Version 2, updated 12 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 EFT CAPITAL’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 up to \$20,000, repayable over a period of 12 – 36 months, to purchase a motor vehicle for the primary purpose of personal use, 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 EFT CAPITAL's Secured Personal Loans are:**

Loan Term: 12 – 36 months

Credit available (subject to meeting eligibility requirements): Up to \$20,000

Establishment Fee: 10% of loan value

Interest Rate: 28%

Early Termination Fee: Nil

Security required: Acceptable security assets include 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 \$20,000 to purchase a motor vehicle primarily personal purpose and are able to provide security.
- wish to repay the secured loan within 12 – 36 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 Australia Citizens, residents or hold 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.
- for whom the Product will not meet their requirements or needs.
- under 18 years of age, or temporary residents with a visa with insufficient time remaining under their visa.
- who are currently bankrupt, or subject to Part 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 of up to \$20,000.
- a loan period of between 12 - 36 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 10% of the loan value, and interest of 28%.

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## 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 \$20,000 for the purchase of an asset for personal use 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 EFT CAPITAL's website online at <https://eftcapital.com.au/>.
- Through approved referral partners; and
- By persons telephonically contacting the EFT CAPITAL office.

### Distribution Conditions

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

- Providing specific content about the Product on EFT CAPITAL'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 telephonic enquiries made to the EFT CAPITAL office.

- Providing specific information about the key product attributes and eligibility requirements through approved referral partners.

### **Factors Considered**

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

- The comparatively wide target market for the Product.
- EFT CAPITAL's ability to restrict distribution by providing sufficient lending guidelines and eligibility requirements.
- EFT CAPITAL's ability to manage the distribution channels.
- EFT CAPITAL's lack of external distributors.
- 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**

EFT CAPITAL 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 EFT CAPITAL 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).

#### **Complaints**

Distributors are required to report and detail in writing all complaints in relation to the Product covered by this TMD to EFT CAPITAL 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 EFT CAPITAL within 10 business days.

### **Appropriateness of the TMD**

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

EFT CAPITAL 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 EFT CAPITAL 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.

EFT CAPITAL 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 EFT CAPITAL to consumers who meet the eligibility criteria and are within the target market, and in compliance with relevant laws; and
- EFT CAPITAL 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.