

## Target Market Determination for EML Heritage VISA Staff Prepaid Card Issued by Heritage Bank Limited

Category	Description	
<b>Product:</b>	<b>EML Heritage VISA Staff Prepaid Card</b> A reloadable prepaid payment facility used to withdraw cash from ATMs and/or purchase goods and services electronically from merchants in Australia and overseas wherever Visa is accepted.	
<b>Start Date:</b> Date the determination was first made	5 October 2021	
<b>Version:</b>	1.0	
<b>Review Date:</b>	The first review, and each ongoing review, must be completed within each consecutive 1 year period from the Start Date.	
<b>Target Market:</b> Class of consumers that comprise the target market for the product	<b>Consumer Description:</b> This describes consumers in the target market	<b>Objectives &amp; Needs</b> A person who may seek a reloadable prepaid payment facility for personal purchases and transactions in Australia and overseas, and who is not seeking a credit or debit card facility.  <b>Financial Situation</b> A person who will have access to funds in Australian dollars to preload the facility and to pay fees (including foreign exchange fees), as and when they become due and payable.
	<b>Product Description:</b> This describes the product	A reloadable, prepaid payment facility with the following key attributes: <ul style="list-style-type: none"> <li>ability to make purchases electronically using the balance of preloaded funds;</li> <li>ability to make cash withdrawals at ATMs; and</li> <li>a requirement to preload the facility and pay fees (including foreign exchange fees).</li> </ul> In general, it is only available to consumers that meet standard eligibility criteria.
	<b>Appropriateness Statement:</b> This explains why the product is consistent with the likely objectives, financial situation and needs of the target market	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.
<b>Distribution Conditions:</b> The conditions and restrictions on the distribution of the product	<b>Marketing and Promotion</b> This condition applies to marketing and promotional materials that describe the product	<b>Condition 1</b> A distributor must only market and promote the product through: <ul style="list-style-type: none"> <li>advertising on television, radio, the internet (including social media), billboards and physical banners, brochures and other marketing material available to the general public;</li> <li>in person recommendations to access marketing material (including in branch communications and referrer networks); and</li> <li>any other issuer approved communication channels (including telephone, email and social media).</li> </ul> This condition is appropriate as the target market is wide.
	<b>Retail Product Distribution Conduct (other than Marketing)</b> This condition applies to all conduct (other than marketing) such as issuing, arranging and providing disclosure material	<b>Condition 2</b> A distributor must only engage in retail product distribution conduct (other than general advice) through: <ul style="list-style-type: none"> <li>through EML's digital platforms and other EML approved third party digital platforms; and</li> <li>any other issuer approved communication channels (including telephone, email and social media).</li> </ul> This condition is appropriate as the target market is wide. It is also appropriate as the issuer has distributed this product using these methods, with limited risk to consumers.

<b>Review Triggers:</b> The events and circumstances that would reasonably suggest the determination is no longer appropriate	The issuer, and any distributor of this product, must cease retail product distribution conduct in respect of this product when the issuer determines a material event or circumstance has occurred in relation to:	
	<b>Material Complaints</b>	material complaints (in number or significance) in relation to the terms of this product and / or the distribution conduct.
	<b>Product Performance</b>	evidence, as determined by the issuer, of the performance of the product, in practice, that may suggest that the product is not appropriate for the target market.
	<b>Distributor Feedback</b>	reporting from distributors, or consistent feedback from distributors on the target market which suggests that the determination may no longer be appropriate.
	<b>Substantial Product Change</b>	a substantial change to the product that is likely to result in the determination no longer being appropriate for the target market.
	<b>Significant Dealing</b>	a material pattern of dealings in the product or of distributor conduct that is not consistent with the determination.
	<b>Notification from ASIC</b>	a notification from ASIC requiring immediate cessation of product distribution or particular conduct in relation to the product.
<b>Reporting Period:</b>	The reporting period for this determination is every 6 months commencing from the Start Date.	
<b>Reporting Information:</b> The kinds of information needed to identify whether a review trigger has occurred, who must report this information and the reporting period	A distributor that engages in retail product distribution conduct in respect of this product must provide the following information in writing to the issuer within the times specified below:	
	<b>Complaint Information</b>	Information about complaints received in relation to the product during the reporting period, and if complaints were received, a description of the number of complaints and the nature of the complaints received and other complaint information set out in paragraph RG 271.182 of Regulatory Guide 271 Internal dispute resolution.  The distributor must provide the information as soon as practicable, or in any event, within 10 business days after the end of each reporting period.
	<b>Distributor Feedback</b>	Information discovered or held by the distributor that suggests that the determination may no longer be appropriate.  The distributor must provide the information as soon as practicable, or in any event, within 10 business days after the end of each reporting period.
	<b>Significant Dealing</b>	Information about any significant dealing in the product that is not consistent with the target market determination of which the distributor becomes aware.  The distributor must provide the information as soon as practicable, or in any event, within 10 business days after becoming aware of the significant dealing.
	<b>Information Requested by Issuer</b>	Information reasonably requested by the issuer.  The distributor must provide the information as soon as practicable and no later than the date specified by the issuer.
<b>Notes:</b> Other information relevant to the distribution of the product	Nil	

#### Document Control

Version	Date	Comments
1.0	5 October 2021	Determination commenced as a result of the new DDO Regime.