

Target Market Determination for Christmas Club Account Issued by Heritage Bank Limited

Category	Description	
Product:	Christmas Club Account A special purpose savings account that earns interest with withdrawal access only during the "Christmas period".	
Start Date: Date the determination was made	5 October 2021	
Version:	1.0	
Review Date:	The first review, and each ongoing review, must be completed within each consecutive 1 year period from the Start Date.	
Target Market: Class of consumers that comprise the target market for the product	Consumer Description: This describes consumers in the target market	Objectives & Needs A person that may seek an account for depositing funds for the specific purpose of only withdrawing the funds during the period 1 November to 31 January, and to earn interest on those funds. Financial Situation A person that may have funds to deposit into the account and pay associated fees when such amounts become due and payable.
	Product Description: This describes the product	A savings account with the following key attributes: <ul style="list-style-type: none"> the ability to earn interest on deposited funds; the ability to withdraw funds only during the period between 1 November to 31 January only; limited transactional capability; and no account keeping or transaction fees but service fees apply. In general, it is only available to consumers that meet standard eligibility criteria.
	Appropriateness Statement: 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.
Distribution Conditions: The conditions and restrictions on the distribution of the product	Marketing and Promotion This condition applies to marketing and promotional materials that describe the product	Condition 1 A distributor must only market and promote the product through: <ul style="list-style-type: none"> advertising on television, radio, the internet (including social media), billboards and physical banners, brochures and other marketing material available to the general public; in person recommendations to access marketing material (including in branch communications and referrer networks); and any other issuer approved communication channels (including telephone, email and social media). This condition is appropriate as the target market is wide.
	Retail Product Distribution Conduct (other than Marketing) This condition applies to all conduct (other than marketing) such as issuing, arranging and providing disclosure material	Condition 2 A distributor must only engage in retail product distribution conduct (other than general advice) through: <ul style="list-style-type: none"> in person communications (including in branch and through referrer networks); and through the issuer's and other third party digital platforms. 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 the consumers.
Review Triggers: 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:	
	Material Complaints	material complaints (in number or significance) in relation to the terms of this product and / or the distribution conduct.
	Product Performance	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.
	Distributor Feedback	reporting from distributors, or consistent feedback from distributors on the target market which suggests that the determination may no longer be appropriate.

Note that when printed, this document may have been superseded. Please refer to heritage.com.au/TMD for the most current version of this document. Heritage Bank Limited. ABN 32 087 652 024. AFSL and Australian Credit Licence 240984. Doc ID Christmas Club Account/v1. Effective 10/21.

	Substantial Product Change	a substantial change to the product that is likely to result in the determination no longer being appropriate for the target market.
	Significant Dealing	a material pattern of dealings in the product or of distributor conduct that is not consistent with the determination.
	Notification from ASIC	a notification from ASIC requiring immediate cessation of product distribution or particular conduct in relation to the product.
Reporting Period:	The reporting period for this determination is every 6 months commencing from the Start Date.	
Reporting Information: 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:	
	Complaint Information	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.
	Distributor Feedback	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 reporting period.
	Significant Dealing	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.
	Information Requested by Issuer	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.
Notes: 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.