

# Target Market Determination

## For the Junior Smart Saver Account

DBCE

### Product

This target market determination (TMD) applies to the Delphi Bank Junior Smart Saver Account.

### Issuer

Delphi Bank, a division of Bendigo and Adelaide Bank Limited ABN 11 068 049 178 AFSL / ACL 237879 (Delphi Bank).

### Date from which this target market determination is effective

5 October 2021.

## 1. Target market for this product

### Target Market

The retail clients for whom this product has been designed are individuals who:

- want to grow their savings;
- want to commence a savings plan and are under 18 years of age;
- want a low-cost savings account with at call access to funds; and
- want to earn interest on their savings.

### Product Description

The Delphi Bank Junior Smart Saver Account is savings account that has been designed for individuals under the age of 18 who want to grow their savings, earn interest and pay no monthly service fees.

### Product key attributes

The key attributes of this product that make it likely to be consistent with the target market described above, include:

Attribute	Appropriate for
Eligibility	Retail clients who are under the age of 18.
Interest payable	Retail clients who want to earn interest.
No minimum balance	Retail clients who want to have no restrictions on balance.
Funds available at Call	Retail clients who want unrestricted access to their funds.
Fees	Retail clients who do not want to pay account maintenance fee or transactions fee.

## 2. How this product is to be distributed

Delphi Bank applies certain conditions and restrictions to the distribution of this product, so that distribution is likely to be to retail clients within the target market for this product. The conditions and restrictions are:

<b>Channel</b>	This product is to be distributed only through the following channels: <ul style="list-style-type: none"><li>• Delphi Bank Branches</li></ul>
<b>Additional conditions or restrictions</b>	The following additional conditions and restrictions also apply to the distribution of this product: <ul style="list-style-type: none"><li>• Only prospective retail clients who meet Delphi Bank's minimum eligibility criteria for the product should apply for this product;</li><li>• This product can only be issued to retail clients after applying Delphi Bank's application and assessment processes;</li><li>• This product can only be issued to individuals under the age of 18.</li></ul>

## 3. Reviewing this target market determination

Delphi Bank will review this TMD as set out below:

<b>Initial review</b>	Within the first year of the effective date.
<b>Periodic reviews</b>	At least every 12 months from the initial review.
<b>Review triggers or events</b>	Any event or circumstances arising that would reasonably suggest the TMD is no longer appropriate. This may include (but is not limited to): <ul style="list-style-type: none"><li>• a material change to the design or distribution of the product, including related documentation;</li><li>• occurrence of a significant dealing;</li><li>• distribution conditions found to be inadequate in ensuring that the product is issued to retail clients who are likely to be in the target market;</li><li>• relevant changes in the law or its application, a change in an industry code or decision of a court or other body (including through regulatory guidance) that materially affects the product;</li><li>• significant changes in metrics, including, but not limited to:<ul style="list-style-type: none"><li>○ a material increase in the number of complaints in relation to a product or aspect of a product; and</li><li>○ an increase in early termination of the product; and</li><li>○ any other event occurs, or information is received that reasonably suggests this TMD is no longer appropriate.</li></ul></li></ul>

## 4. Reporting and monitoring this target market determination

Delphi Bank's third-party distributors who are regulated persons will need to collect, keep and report the following information to Delphi Bank:

Type	Description of information	Frequency of reporting
<b>Complaints</b>	Customer complaints made in relation to this product. This includes: <ul style="list-style-type: none"> <li>• written details of the complaint; and</li> <li>• the number of complaints during the reporting period.</li> </ul>	<b>Reporting period:</b> Monthly <b>When does the regulated person have to report:</b> Within 10 business days of the end of the reporting period.
<b>Sales data</b>	Sales and customer data in relation to this product as requested by Delphi Bank.	<b>Reporting period:</b> Monthly <b>When does the regulated person have to report:</b> Within 10 business days of the end of the reporting period.
<b>Significant dealings</b>	The following information: <ul style="list-style-type: none"> <li>• details of the significant dealing;</li> <li>• the date (or range) on which the significant dealing occurred;</li> <li>• why the distributor considers the dealing to be significant (including why it is inconsistent with this TMD); and</li> <li>• how the dealing was identified.</li> </ul>	<b>When does the regulated person have to report:</b> Within 10 business days of the distributor becoming aware of the dealing.