Finkey Capital Segmentation (Target Market) Determinations

This Target Market Determination (TMD) is adopted by Finkey Capital Pty Ltd (ACL 550288) to support product governance for our credit products regulated under the NCCP Act. While Design & Distribution Obligations typically apply to financial products (not consumer credit), we maintain this TMD to align with assessing unsuitability and verifying consumer circumstances.

Products covered in Scope

- **Finkey Green Loan Products (Unsecured Personal Loan)**
- **Finkey Zero-Interest 0% Green Plan Product (Unsecured BNPL)**
  The 0% Green Plan operates as low-cost credit under the NCCP Act's Low-Cost Credit regime with modified responsible-lending style obligations and fee/charge controls.

Meeting this TMD does not guarantee approval.

Lender:	Finkey Capital Pty Ltd ABN 37 662 168 916, a holder of Australian Credit License (ACL) No. 550288.
Date of Issue:	20 October 2023
Relating Credit Products:	Finkey's unsecured green loan (credit) product and payment plans (zero-interest green plan) provide zero-interest payback and competitive interest rates and for various green, sustainable, and efficient home improvements to help Australian homeowners and their families live sustainably. Finkey's platform and product offering will assist homeowners with making investments on their property with financial products. Finkey's products will help homeowners by reducing the capital requirements and cash flow burden of 'going green' through the amortisation and deference of upfront costs with easy, predictable fortnightly repayments. The credit products and payment plans are for the eligible purchases of goods and services, including green renewable energy technology, energy-efficient products, or sustainably sourced and manufactured materials,

	Finkey's three core Green Personal (Home improvement) Loan products: • Green Renovation Loan • Green Repair & Maintenance Loan • Green Project Loan Finkey's main interest-free product is a BNPL product assessed for serviceability and credit: • Zero-interest Green Plan (0% Green Plan)
Introduction:	This Segmentation (Target Market Segmentation) document does not provide financial advice or stand to interpretation as a customer disclosure document. And should not be interpreted as an overview of Finkey's product terms, conditions, or features. It aims to provide authorised or accredited organisations (Vendors, tradespersons, installers, builders, project managers, product manufacturers and distributors, retailers) and their consumers (Borrowers of Finkey) and third-party service providers an overview of related financial and credit products to Finkey's consumer segments. The suitability of products to the target market is cognisant of their segmentation, which includes individual objectives, financial situation, goals and needs. Applicants & prospective borrowers should reference Finkey's website and materials, including but not limited to: 'Green eligibility criteria', full Terms and Conditions, Credit Guide, Privacy Policy, and any other documents setting out other relevant terms and conditions when undertaking credit decisions. The documents are found on Finkey's website https://finkey.co and presented electronically before credit is issued. Copies can be requested by contacting the customer service team at: info@finkey.co
Disclaimer:	Borrowers must carefully review the terms and conditions of Finkey's financial and credit (loans) and, if unsure, consult a financial advisor to determine whether the type of loan suits their specific needs and financial situation.

	Prospective Borrowers must follow a set of rules that pertain to Finkey's internal requirements to be eligible for finance through us. This involves but does not exclude having engaged a Finkey-accredited Vendor, conducting a project or home renovation that involves installing or incorporating renewable or green technology, sustainable materials or any other improvement or inclusion that increases their home energy efficiency.
Finkey’s Key Target Market and Segments	
The Green Renovation, Project or Repair Loans are designed for borrowers with the following market attributes:	**Borrower needs, objectives and financial situation of the Green Loans are appropriate.**
Homeowners or joint applicants*, where one borrower is the homeowner (listed on title) and requires funds for green technology and renewable energy installations/projects or home improvements that incorporate sustainable materials, technology and any increase or upgrade in home efficiency as part of a home improvement: • Green-eligible Conduct home renovations • Green technology installation, including grid-connect or off-grid renewable energy projects • Green-eligible home repairs/maintenance *In situations where joint applicants are married or de facto, where the spouse from where servicing income is derived is not listed on the title, the joint applicants must provide proof of residency together or a document that proves their relationship status, i.e. marriage certificate, tax assessment etc.	The Green Loan is designed to finance home improvements, including renovations and repairs incorporating green or renewable energy generation technology, sustainably sourced and manufactured materials or other goods or services additions or upgrades that make a material effect on home energy efficiency or sustainability. The loan can cover the renovation or project's cost, including labour and materials, at a tailored fixed interest rate proportional to the applicant's credit profile and considering their financial circumstances. These types of loans are generally suitable for customers looking to undertake more extensive, invasive, and varying green projects and energy-efficient home improvements, some of which include but are not limited to: installing solar panels or hot water during a bathroom renovation; upgrading to energy-efficient appliances during a kitchen renovation; making other energy-saving improvements such as upgrading electric stoves to induction cooktops; installing double glazed windows; or utilising FSC timber into cabinetry, decking or roofing. Finkey’s zero-interest product, the 0% Green Payment Plan, is suitable for only renewable energy generation installations (solar, battery, inverters, or wind) and other technology installations or upgrades through a Finkey Network Vendor. We incentivise Australian households to live and borrow sustainably by offering preferential green rates and carbon offset incentive schemes for most green renovations and green technology projects. An outline of how the system works, including Finkey's Carbon Awards eligibility criteria, can be found on Finkey's website.

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<td>Depending on the specific project, benefits of green technology installations or renovations may include government subsidies, incentives or reduced utility bills.

It is important to note that while Finkey’s financial products are designed for personal, domestic, or household purposes, borrower eligibility and final terms are contingent on our credit policy.</td>
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<td>Borrowers financing projects that are:
between $5,000 to $50,000.
Solar, battery, inverters or wind energy generation installations must be at least $2,000 and up to $35,000 for zero-interest payment plans.
Have horizons to pay the finance amounts within six months to 5 years with regular repayments.</td>
<td>Green Loan
Amount: The Green Loan must be at least $5,000 and up to $50,000.
Repayments: Borrowers must repay the loan fortnightly by making fixed principal and interest repayments. The loan agreement, repayment terms and schedule will be agreed upon between the borrower and Finkey when the loan is approved.
Fixed rate: With a static interest rate that will not change throughout the relevant contractual period of the loan, borrowers have certainty over their repayment obligations and overall financial circumstances.
The rate range varies between 7.29-22% pa (compounded at the frequency of the repayments offered i.e. fortnightly), dependent on the overall risk profile of the applicant and their financial circumstances.
Green Loan proceeds may be paid to vendors (preferred) or as otherwise permitted by policy.

Zero-interest Green Payment Plan
Amount: The 0% Green Plan must be at least $2,000 and up to $35,000.
Repayments: Borrowers must repay the finance amount and fees fortnightly by making fixed repayments. When the loan is approved, the Green Plan agreement, repayment terms, and schedule will be agreed upon between the borrower and Finkey.</td>
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	0% Green Plan is purpose-tied to vendor invoices (no cash-out) • **Term:** Both product terms must be at least six months and up to 5 years.
• Require flexibility to make extra repayments or pay out the loan early	• **No extra repayment charges**: borrowers can make early repayments for all financial products without penalty or fees. • **No early discharge penalty**: if customers pay out any Finkey financial product, they will not incur any fees or charges.
Unsuitable customers Finkey financial products will **not be suitable** for individuals who:	• are under 18 years old; • cannot be identified and verified under AML/CTF (including approved alternative ID procedures consistent with AUSTRAC guidance); • are renting or don't own a home; • are homeowners but are not listed on title; • commercial or small business clients (Finkey Commercial) • are not an Australian citizen or permanent resident; • have an average credit score below the threshold set by Finkey Capital; • have unpaid defaults; • less than lower mid-tier credit ratings; • are unemployed; • are a current or prior bankrupt or party to a court judgement; • looking for variable interest rates - interest rate may increase/decrease over the life of the loan; • want to be able to redraw any additional repayment made on the loan; • requires a secured loan; • require settlement of funds into their account; • want to pay for the cost of the project or works directly with their own money; • not engaged a qualified and Finkey-approved and onboarded tradesperson or business (accredited Finkey Network Vendor); • not undertaking a home improvement project or renovation defined under Finkey's 'Green' eligibility criteria.

Accredited organisation for the project and installations:	A Finkey Accredited Tradesperson is a qualified and certified tradesperson, builder, project manager, product manufacturer, retailer or certified installation organisation approved by Finkey. Customers must engage and select a relevant tradesperson out of Finkey's Network Vendor databse in their servicing area or have their preferred tradesperson (only when applying for Green Loans) become an accredited organisation (Vendor) with Finkey.

Finkey Green Loan is restricted to the following uses:	Undertaking a green or sustainable project or renovation as defined under Finkey's 'Green' eligibility criteria.
	
	The goods and materials delivered, installed/managed for the project or renovation are by an organisation onboarded as a Finkey Network Vendor or accredited/authorised organisation by Finkey (Vendor).
	Vendors (organisations or individuals) will not be approved as Finkey Network Vendors if they do not hold the relevant licences, qualifications and recognitions.
	Applicants must be borrowing for one or more of the following:
	
	• Solar panels
	• Inverters
	• Battery storage
	• Inverters
	• Solar system and battery combo
	• Off-grid power systems (solar, battery, wind, modular-hydro)
	• Small-scale modular wind generation
	• Modular solar systems
	• Combined energy systems (solar + heating, solar + wind)
	• Electric Vehicle charges and components
	• Solar heating and cooling
	• Double or triple-glazed windows
	• Thermal blinds or shutters
	• Thermal Doors
	• Ceiling Insulation (R-rating 5.0+)
	• Power factor correction
	• Smart Home Technology and Installations
	• Home energy efficiency upgrades
	    o LED Lighting
	    o Green Energy Star 5+ White goods upgrades
	    o Induction cooking or Electrical upgrades (from gas cooking)
	    o Airconditioning (5+ Star Zoned Energy Rating)

	◦ Other smart home appliances or systems • Sustainably sourced and manufactured building eco materials - GECA-certified builders preferred utilising GECA standards. • 7-STAR energy efficiency certified materials • FSC Timber cabinetry and materials • Above-ground rainwater tanks • Roofing ('Green Roofing' - efficiency improvements) • Off-grid rain or greywater storage systems • Other eligible energy-efficient materials (sustainably produced and certified) or technology recognised by green certification (ref. federal or state classifications) Renewable energy technology and components must be registered and approved by the Clean Energy Council (CEC) and listed under the CEC's relevant database. Other technology products and services must be recognised under the Victorian Energy Upgrades (VEU) Program. Vendors will be recommended to become NETCC-approved (National Energy Tech Consumer Code) upon onboarding.

Distribution of Finkey's Green Loan
Finkey Capital applies the following conditions and restrictions to the distribution of the Green Loan products so to ensure the product is likely to be provided to customers who meet the criteria for the credit product or the segment Finkey is pursuing in its Sales, Marketing and Distribution Strategy.

Distribution Channels:	• Finkey Network Vendors • SME businesses operating in the renewables, 'green', sustainability space can recommend Finkey to aid their customers in obtaining finance for their eligible home project • Product manufacturers or distributors and their network of installers • Direct to the consumer: Finkey website & marketing campaigns • Finkey call centre; and • Authorised third-party distributors such as: ◦ partner websites (including comparison websites); ◦ other authorised referrers.

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<tr><td>Distribution Conditions:</td><td colspan="2">Green Loan suite of products can only be distributed by partners of Finkey:

• Finkey Network Vendors to recommend Finkey to their customers for eligible products and projects;
• to customers who meet the eligibility requirements;
• to customers who have appropriate borrowing capacity;
• in accordance with Finkey’s ‘green’, credit and servicing eligibility criteria; responsible lending guidelines, policies and procedures;
• through authorised accredited Distributors who have met Finkey’s eligibility requirements and have been onboarded as Vendors; and
• Distributors must hold current accreditation, complete annual training & attestation, and use approved sales scripts.

Reasonable steps (issuer & distributors)
• Confirm product purpose (eligible ‘green’ works), vendor accreditation, and basic eligibility (age, residency, IDV);
• File reviews / mystery shops and remediation (coaching, removal where required); and
• Data monitoring for out-of-target sales, complaints, and hardship spikes.</td></tr>
<tr><td colspan="3">Reporting Information
Sales distributors or possible regulated entities/persons that encounter complaints or disputes must provide Finkey Capital with the following information.</td></tr>
<tr><td>Category</td><td>Information required by Finkey from distributors</td><td>Scope of reporting</td></tr>
<tr><td>Complaints</td><td>All complaints made in relation to the Finkey finance product(s), including:
• the number of complaints received during the reporting period (which may be 0) and;
• written details of any complaints.</td><td>When to report:
Quarterly

How to report:
Communication detailing the nature of the complaint should be addressed to: Manager, Risk and Compliance, by email at: complaints@finkey.co</td></tr>
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Significant dealings	All significant dealing concerning the Finkey Unsecured Personal Loan and the contents of this document and its nature.	**When to report:** Immediately and no later than 10 business days after becoming aware. **How to report:** Reports must be made to the Manager, Risk and Compliance at: compliance@finkey.co Reports must include counts, themes/root causes, and any affected consumer remediation taken.

Version and Review Control

Document Title:	Finkey Segmentation (Target Market) Determinations
Document no.	FK00X
Document Version:	1.0
Date Last Modified:	20/10/2023

Review Intervals Review Trigger	Initial Review: Within 12 months of the date of this document. Ongoing Review: Within 12 months of the date of the previous review. Finkey will review the document if one or more of the following events occur where they reasonably suggest that the document is no longer appropriate: • Material changes to the Finkey Unsecured Green Loan terms and conditions; • Material changes to the Finkey 0% Green Payment Plan terms and conditions; • Changes to any or all eligibility criteria; • Material changes to the Finkey Credit Policy; • Occurrence of a significant dealing (where the products in question are incorrectly defined); • If the distribution conditions change or are sufficiently undefined; • If there is an external event such as negative press, legal, or regulatory action; • If there is a significant change in metrics, in line with what the credit policy dictates, this includes, but is not limited to, complaints, default rates and application rates; • Complaints: ≥ 5 per 1,000 accounts/quarter about mis-selling/unsuitability; • Defaults/Hardship: >20% quarter-on-quarter increase;

	• Vendor incidents: ≥2 substantiated mis-selling incidents in a quarter; and • Regulatory change: material law/regulatory update affecting product (e.g., BNPL/LCCC changes).
Next Review Date:	10/11/2025

Department Responsible:	Risk and Compliance
Document Based On:	Credit Policy & Internal Eligibility Policies and Procedures
Approved by:	[redacted]
Signed	[redacted]

Version and Revision History

Version	**Author**	**Amendment Date**	**Changes**
0.1	[redacted]	31/01/2023	Document scaffolded
0.2	[redacted]	18/01/2023	Amendments to scaffold
0.3	[redacted]	21/02/2023	Content additions
0.3	[redacted]	11/04/2023	Review
0.4	[redacted]	14/08/2023	Content additions
1.0	[redacted]	20/10/2023	Content additions, review and first version
1.1	[redacted]	01/06/2025	Updated changes in regulatory environment.

Author to be redacted upon document's issuance publicly.