

# Target Market Determination

Smart Awards credit card

**Start date:** 21<sup>st</sup> August 2024

**Next review due:** 1<sup>st</sup> June 2025

**Review period:** At least every 12 months from the start date of this Target Market Determination

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## What is a Target Market Determination?

A Target Market Determination (TMD) describes the cohort of customers that the product is targeted at (the Target Market) and any conditions around how the product is distributed to customers (the Distribution Conditions).

It also describes the events or circumstances where we are required to review the Target Market Determination for a financial product (the Review Triggers).

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## Why does CommBank need to have Target Market Determinations?

We're required to have Target Market Determinations under law. The purpose of the law is to make sure customers are at the centre of our approach when designing and distributing our financial products. This document is not a substitute for the product's terms and conditions or other disclosure documents.

When making a decision about this product, customers must refer to the relevant Product Disclosure Statement (PDS), Terms and Conditions or other disclosure documents.

# Target Market

The table below matches the Product Attributes to the Objectives and Needs of the Target Market for this Product. CBA has assessed that the Product including its Key Attributes are likely to be consistent with the Objectives and Needs of the Target Market.

Objectives and Needs	Product Attributes
Require a revolving credit facility with a convenient way to make payments and access cash by using the card attached to the facility	<p>This credit card can be used in the following ways:</p> <ul style="list-style-type: none"> <li>• make card-present payments, including point of sale;</li> <li>• make card-not-present payments, including over the phone, online or via mail;</li> <li>• make digital wallet payments, including point of sale and online (if available by the Merchant);</li> <li>• set up a recurring payment arrangement;</li> <li>• access cash; and</li> <li>• access SurePay purchase or balance instalment plans to break down a purchase or balance into fixed monthly instalments over a set term.</li> </ul>
Ability to earn awards points when spending on their card	<ul style="list-style-type: none"> <li>• Earn unlimited awards points when spending using the credit card.</li> <li>• Ability to earn extra points on certain transactions</li> <li>• Awards points are redeemable for:               <ul style="list-style-type: none"> <li>○ cash back into the account;</li> <li>○ goods or services;</li> <li>○ travel; and</li> <li>○ gift cards from various award partners.</li> </ul> </li> </ul>
Ability to pay no monthly fee	<ul style="list-style-type: none"> <li>• No monthly fee if customers meet a minimum monthly spend on their card in a given statement period.</li> </ul>
Access to interest free days on purchases	<ul style="list-style-type: none"> <li>• Up to 44 days interest free on purchases</li> </ul>
Access to different insurance options and extended warranty	<p>This credit card provides access to five complimentary insurances subject to eligibility conditions:</p> <ul style="list-style-type: none"> <li>• International travel insurance, when customers use their eligible credit card to spend at least \$500 in a single transaction on prepaid travel costs for their trip before leaving Australia or redeem \$500 worth of prepaid travel costs using CommBank Awards points for their trip before leaving Australia and activate the Overseas Travel Policy for their trip</li> </ul>



	<ul style="list-style-type: none"> <li>• Purchase security insurance available for eligible lost stolen or damaged purchases</li> <li>• Interstate Flight Inconvenience Insurance</li> <li>• Price Guarantee Insurance; and</li> <li>• Extended warranty on eligible purchases.</li> </ul>
Does not want to incur international transaction fees	<ul style="list-style-type: none"> <li>• No international transaction fees for purchases made overseas or online.</li> </ul>
Access to spend and security controls	<ul style="list-style-type: none"> <li>• Lock, Block, Limit offering extra control and customisation (e.g. set spending caps or transaction limits, block ATM cash advance);</li> <li>• Customers can choose to block gambling transactions</li> </ul>

## Financial Situation

The Financial Situation of the Target Market are customers that:

- meet CBA's credit assessment criteria which includes demonstrating the capacity to service the credit card without substantial hardship;
- choose a credit limit typically above \$3,000;
- will pay a higher interest rate; and
- will pay a higher monthly fee (if criteria is not met for the fee waiver).

CBA views that its processes in place, including assessing the customer's ability to service the credit card, will mean that the product will likely be consistent with the Financial Situation of the Target Market.

## Customers outside of the target market

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This product is not targeted at customers who:

- can only service a credit limit typically lower than \$3,000;
- require a low cost credit card (e.g. a credit card which has a low interest rate on purchases and low monthly fee);
- do not require access to an awards program or a range of benefits such as complimentary insurances; and/or
- are likely to carry a substantial balance over a prolonged period of time (unless a promotional rate and/or grace period applies).

## Eligibility criteria for the Product

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To hold this product, customers will need to satisfy certain eligibility criteria, including that customers must:

- be individuals aged 18 years or older;



- have an Australian residential address;
- meet CBA's credit assessment criteria which includes demonstrating the capacity to service the credit card without substantial hardship.

## Distribution Conditions

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CBA will have oversight over how the product is promoted and issued. All customers must satisfy CBA's credit assessment criteria which demonstrates the customer's capacity to service the credit card. In addition, the below table identifies the distribution channels which the product can be sold through and sets out the conditions that apply to each channel. CBA views that the conditions specified are appropriate and are of a nature that it will be likely that the product will be distributed to the Target Market.

### Proprietary:

Distribution Channels	Conditions that make product distribution through the channel appropriate
Staff assisted channels (e.g. branch or over the phone); and	<p>CBA staff that distribute this product:</p> <ul style="list-style-type: none"> <li>• are appropriately trained to understand and discuss the benefits, rates and fees of the product and the key differences between credit card products;</li> <li>• must follow procedures that outline application eligibility and processes, which may include sales guidelines and scripting;</li> <li>• have access to product resources such as credit card comparison tools; and</li> <li>• are monitored through controls such as sample call monitoring or sales conduct incidents to ensure proprietary distribution adheres to procedures.</li> </ul>
Online channels (e.g. CommBank website, NetBank and the CommBank app).	<p>CBA's online channels provide customers with access to:</p> <ul style="list-style-type: none"> <li>• card selection tools that assist customers select the right products; and</li> <li>• information about the products with a summary of key benefits, trade-offs and rates/fees, in an easy to navigate format.</li> </ul>

## Review Triggers

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If any of the below review triggers occur, or if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate, CBA will undertake a review of this TMD.



Information Type	Description
Customer Outcomes	<p>Unexpected trends in customer outcomes which are significantly inconsistent with the intended product performance, including:</p> <ul style="list-style-type: none"> <li>• customers who are closing their account prior to usage;</li> <li>• customers in hardship arrangements;</li> <li>• persistent credit card debt indicators such as customers who carry a substantial balance over a prolonged period of time; and</li> <li>• customers who are being charged a fee, not utilising their Awards features such as the earning or redemption of Awards Points and would have been better suited to a low cost credit card.</li> </ul>
Complaints	<p>Unexpected trends in complaints received from customers who acquired the product, which relate to the customer's purchase or use of the product, for example:</p> <ul style="list-style-type: none"> <li>• distribution (e.g. misrepresentation or mis-selling from staff);</li> <li>• product suitability (e.g. customers unable to service the credit facility at origination); and</li> <li>• product attributes (e.g. the customer's ability to earn and redeem Awards points is significantly inconsistent with expectations or certain product features can't be accessed).</li> </ul>
Incident Data	<p>A material incident or significant number of incidents in relation to the product's design or distribution that identify potential breaches of our legal or regulatory obligations.</p>
Changes to the Product	<p>The material alteration of the product or product terms and conditions (e.g. adding to, removing or changing a key product attribute; significant change to distribution channel and distribution strategy).</p>
Significant Dealings	<p>Any significant dealing of the product to customers who are outside of the Target Market.</p>
Notification from ASIC	<p>The receipt of a product intervention power order from ASIC requiring CBA to immediately cease retail product distribution conduct in respect of the product.</p>

**Product Issuer:** Commonwealth Bank of Australia ABN 48 123 123 124 AFSL and Australian credit license 234945

