









# Target Market Determination

for   Expat – Variable Product

	<ul style="list-style-type: none"> <li>▪ Third party brokers must also:             <ul style="list-style-type: none"> <li>○ hold appropriate qualifications, industry membership and authorisations to engage in credit activities; and</li> <li>○ comply with their obligation to act in the best interests of their client when providing credit assistance.</li> </ul> </li> <li>▪ These conditions ensure distributors are appropriately authorised to provide the relevant regulated credit services and will comply with the commercial terms agreed between the distributor and Product Manager.</li> </ul>
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## Review Triggers

Columbus has outlined below its review triggers for this product (Review Triggers). This TMD will also be reviewed if an event or circumstance has occurred that would reasonably suggest that the TMD may no longer be appropriate. Our review triggers for this product are:

Review triggers	Description
Customer outcomes	<ul style="list-style-type: none"> <li>▪ Unexpected trends in consumer outcomes which are significantly inconsistent with the intended product performance.</li> <li>▪ Unexpected early-stage arrears are detected.</li> <li>▪ A significant number of defaults occur.</li> <li>▪ A significant number of late repayments are being recorded.</li> <li>▪ Evidence that the product or distributor conduct are significantly different to the Target Market.</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>▪ A significant number of material complaints are received from consumers in relation to the product.</li> </ul>
Incident Data	<ul style="list-style-type: none"> <li>▪ A material incident or significant number of incidents in relation to the product’s design or distribution that identify breaches of our legal or regulatory obligations.</li> </ul>
Changes to the Product	<ul style="list-style-type: none"> <li>▪ 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).</li> </ul>
Significant Dealings	<ul style="list-style-type: none"> <li>▪ A significant dealing of the product to consumers outside the Target Market occurs.</li> </ul>

# Target Market Determination

## for AMO OPAL Expat – Variable Product

### Notification from ASIC

- The receipt of a product intervention power order from ASIC requiring us to immediately cease retail product distribution conduct in respect of the product.

If a review trigger occurs, Columbus will complete a review of the TMD within ten (10) business days. Meanwhile, it will cease to offer this product to our consumers until our TMD review concludes and any necessary changes to the product or TMD, including distribution methods, are made.

## Distributor Reporting Requirements

The following data must be provided to us by any person who engages in retail product distribution conduct in relation to this product:

Type of information	Description	Reporting period
<b>Complaints</b>	Number of complaints, details of the complaint, including name and contact details of complainant and substance of the complaint.	Quarterly, and in any case no later than 10 business days from the end of the quarter.
<b>Significant dealing(s)</b>	Date or date range of the significant dealing(s) and description of the significant dealing (e.g., why it is not consistent with the TMD).	As soon as practicable, and in any case within 10 business days after becoming aware.
<b>Feedback</b>	Details of any suggested feedback and improvements.	As soon as practicable, and in any case within 15 business days after becoming aware.
<b>Information requested</b>	Any other information requested by the Product Manager.	As soon as practicable, and in any case within 10 business days after receiving such request.