1. **Target Market Determination - EFTPOS Emergency Relief Prepaid Card**

The EFTPOS Emergency Relief Prepaid Card(**Prepaid Card**) is a financial product for the purposes of the design and distribution obligations set out in Part 7.8A of the *Corporations Act 2001* Cth).

The purpose of this Target Market Determination is to provide consumers with information about the Prepaid Cards’ key attributes, the target market for the Prepaid Card, and the distribution and monitoring arrangements between the issuer, Indue Ltd and the distributor, the Department of Families, Fairness and Housing (DFFH).

This document is not to be treated as a full summary of the product’s terms and conditions and is not intended to provide financial advice. You should refer to the Product Disclosure Statement for the Prepaid Card available from DFFH when making a decision about this product.

**Date from which this Target Market Determination is effective**

5 October 2021

1. **Target Market**

The information below summarises the overall class of consumers that fall within the target market for the Prepaid Card, based on the product key attributes and the objectives, financial situation and needs that it has been designed to meet.

1. **Class of consumers that fall within the target market**

The Prepaid Card is for those who are assessed to be eligible for financial assistance from the Victorian Government through the Personal Hardship Assistance Program (PHAP) following an eligible emergency event.

1. **Description of the Prepaid Card and its key attributes**

The Prepaid Card is a single load EFTPOS card.

The key attributes of the Prepaid Card are that:

* emergency relief or re-establishment assistance payments can be loaded onto the card by DFFH;
* it can be reloaded;
* can be used at any merchant that accepts EFTPOS;
* has no ongoing or post-supply fees; and
* can be used to purchase any item(s) up to the value loaded onto the card.
1. **Excluded class of consumers**

The Prepaid Card has not been designed for anyone other than those assessed to be eligible for emergency relief and/or re-establishment assistance payments.

1. **Consistency between target market and Likely objectives, financial situation and needs**

The Prepaid Card is is likely to be consistent with the likely objectives, financial situation and needs of individuals in the target market as it provides a mechanism for the individual to receive emergency relief and/or re-establishment assistance payments and use the funds to purchase food, clothing, personal items or specific transport needs from merchants that accept EFTPOS cards.

1. **Distribution Conditions and Restrictions**
2. **Distribution channels**

The Prepaid Card is designed to be distributed to consumers directly by DFFH.

1. **Distribution conditions and restrictions**

The Prepaid Card should only be distributed to individuals who qualify for emergency relief and/or re-establishment assistance.

1. **Adequacy of distribution conditions and restrictions**

The conditions associated with qualifying for emergency relief and/or re-restablishment assistance, and the assessment and verification process put in place by DFFH, will make it likely that individuals who receive the product are in the class of consumers for which it has been designed.

1. **Reviewing this Target Market Determination**

We will review this Target Market Determination in accordance with the below:

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| **Initial review** | Within the 6 months of the effective date.  |
| **Periodic reviews** | At least every 1 year from the initial review. |
| **Review triggers or events** | Any event or circumstances arise that would suggest the Target Market Determination is no longer appropriate. This may include (but not limited):   * a material change to the design or distribution of the Prepaid Cards, including related documentation;
* occurrence of a significant dealing;
* distribution conditions found to be inadequate;
* change in legal or regulatory requirements;
* external events such as adverse media coverage or regulatory attention; and
* significant changes in metrics, including, but not limited to, 10 complaints in any 6 month period.
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Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

1. **Reporting and monitoring this Target Market Determination**

We will collect the following information from our distributors in relation to this Target Market Determination:

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| **Complaints** | Distributors will report all complaints in relation to the product(s) covered by this Target Market Determination on a monthly basis. This will include written details of the complaints. |
| **Significant dealings** | Distributors will report if they become aware of a significant dealing in relation to this Target Market Determination within 10 business days. |