Target Market Determination

For Athena Home Loans ABN 24 619 536 506 (Issuer)
Mortgage Choice Freedom Tailored Plus (Product)

1. About this document

This target market determination (TMD) is issued by Athena Mortgage Pty Limited ABN 23 619 536 506 Australian Credit Licence 502611 under section 994B of the Corporations Act 2001 (Cth).

It seeks to offer consumers, Distributors and staff with information about the class of consumers for which the Mortgage Choice Freedom home loan product has been designed, having regard to the objectives, financial situation and needs of customers within the target markets. It also specifies distribution conditions, review and record keeping requirements.

This document is not to be treated as a complete summary of the product terms and conditions and does not contain or provide financial advice. Consumers must refer to the product terms and conditions and any supplementary documents which outline the relevant terms and conditions in relation to this product when making a decision about whether to acquire the product.

Product to which this target market determination applies

This TMD applies to our Mortgage Choice Freedom Tailored Plus residential mortgage product. The terms and conditions of the product are set out in the Athena Home Loans General Terms & Conditions Version 11 dated November 2025.

Date from which this target market determination is effective

25 August 2026

Mortgage Choice Freedom Powered by ATHENA

2. Class of consumers that fall within this target market

The Mortgage Choice Freedom Tailored Plus residential mortgage product is designed for customers who require an investment loan secured by investment residential real estate. Customers must meet the following minimum eligibility criteria:

- be 18 years or over at the time of application
- be an Australian resident
- meet credit criteria, including being able to demonstrate sufficient consistent income to support the repayment obligations
- provide security over residential real estate that is acceptable under our credit policy requirements

In addition to the above, customers suitable for Mortgage Choice Tailored Plus would also have at least one secondary requirement to:

- Utilise a non-trading trust or non-trading company to borrow funds for investment purposes

2.1 Product descriptions and key attributes

The Mortgage Choice Freedom Tailored Plus residential mortgage loan can be chosen to meet customer needs based on the predominant purpose of the loan, repayment types and product features.

This product can be used for the purchase of a residential dwelling, where such residential dwelling acts as security for the loan. The product enables the customer to repay the loan by making principal and interest or interest only repayments.

The product attributes available are as follows:

	Eligibility details
Attributes	**Investor**
Minimum loan size	$100,000
Maximum loan size	$3,000,000
Loan term	10 years to 30 years
Loan to value ratio (LVR)	Up to 85% LVR
Repayment types	Principal and Interest or Interest Only
Interest rate types	Variable
Residency	Australian/NZ permanent residents living in Australia
How the property is used and occupied	A private residential dwelling that is rented out to tenants on a permanent basis, or has a short-term rental agreement that meets acceptance criteria.
Location and condition of the property	A property that meets our credit policy criteria, including, but not limited to: 1. is located within an acceptable postcode 2. is an acceptable building type 3. is not primarily used for the purpose of operating a business; 4. is well maintained and in good condition; and/or does not require, nor is under construction 5. is within our desirable land size restrictions

2.2 Objectives, and needs

The below table sets out the product attributes which apply to each product option which may help guide customers and Distributors to determine which product option best suits their needs:

Needs and objectives	Tailored Plus
Need lending to a non-trading company or trust borrower	✓
Is self employed and need flexible income verification options	✓
Need a home loan with an LVR below 85%	✓
Need a home loan for owner occupied property	–
Need a home loan for investment property	✓
Need a home loan for commercial property	–
Need to access equity for investment purposes	✓
Need a home loan for acceptable business purposes where it is not the predominant loan purpose	✓
Want to consolidate other debts as a non-predominant borrowing purpose	✓
Need a loan that allows multiple properties to be used as security	✓
Want to minimise repayments by making interest only repayments for an agreed period of time and have the capacity to service higher repayments later	✓
Want to make principal repayments so as to reduce outstanding loan and build up equity	✓
Need certainty that interest rates and repayments won't change for an agreed period of time	–
Want the ability to split your loan facility to take advantage of different loan features	✓
Want the ability to make unlimited additional repayments	✓
Need the ability to withdraw additional repayments from time to time	✓
Want the benefits of an offset feature to place all available funds to maximise interest reduction benefit but also able to make regular and frequent withdrawals	✓
Want the benefit of multiple offset sub-accounts to separate your money for different goals	✓
Want to be able to make changes to the loan at any time such as top up, sale of a property, reducing loan limit or refinancing to another lender at any time (conditions and fees may apply)	✓
Need access to payment features to be able to pay anyone via EFT	✓

2.3 Financial situation

Mortgage Choice Freedom Tailored Plus product has been designed for customers who meet our credit policy criteria, which includes:

- having a sufficient deposit (if purchasing) or equity in their property (if refinancing);
- having the ability to meet the agreed repayments of their loan (including interest and charges) in accordance with the loan contract without hardship.

2.4 Excluded class of consumers

This product has not been designed for individuals whose predominant purpose is not to purchase residential property in Australia, for example but not limited to, the purpose of commercial property or solely to fund business operations.

Mortgage Choice Freedom home loans may not be suitable for all eligible home loan customers, due to our credit risk appetite as governed by our credit policy which may be updated from time to time, or because of their financial position or the nature of their income sources.

2.5 Consistency between target market and the product

The product is likely to be consistent with the objectives, financial situation and needs of the class of consumers in our target markets based on the key terms, features and attributes of our home loans.

The design of our credit policy and distribution policy ensures that our products are only sold if the relevant product is assessed as meeting the likely objectives, financial situation and needs and objectives of the relevant customer.

3. How these products are to be distributed

Mortgage Choice Freedom home loans are distributed via accredited Mortgage Choice brokers and via the realestate.com.au website.

The product must only be distributed to customers in accordance with Athena's product, credit criteria and process requirements. All customers must satisfy applicable credit assessment criteria which demonstrates the customer's ability to service the loan. In addition, the below table identifies the distribution channels through which the product can be sold and sets out the distribution conditions that apply.

3.1 Distribution conditions

The product may only be distributed:

- if the customer meets the eligibility and credit criteria; and
- the product is likely to meet the objectives, financial situation and needs of the customer; and
- each Distributor and/or their employees are appropriately trained and accredited to distribute the products; and
- under the following circumstances:

Conditions	Description
Marketing and promotions conditions	A Distributor must only market and promote the product through: • advertising on television, radio, the internet (including social media), billboards and physical banners, brochures and other marketing material available to the general public; • in person recommendations to access marketing material (including brokers and through referrer networks); and • any other approved communication channels (including telephone, email and social media). This condition is appropriate as the target market is wide.
Retail product distribution conduct conditions (other than marketing and promotions)	A Distributor must only engage in retail product distribution conduct (other than marketing and promotions) through: • in person communications (including brokers and through broker and referrer networks); • through Mortgage Choice's and other approved third party digital platforms; and • any other Mortgage Choice approved communication channels (including telephone, email and social media). This condition is appropriate as the target market is wide and brokers and Mortgage Choice Freedom staff have the requisite knowledge and training to assess whether the customer is in the target market for the product.
General conditions	• This product must only be distributed in accordance with this TMD • Distribution of this product must comply with all our eligibility and credit policy criteria • This product cannot be distributed where this TMD is not up to date and no new TMD has been published; and • The TMD must be current and not subject to any ASIC action that might suggest the TMD is no longer appropriate.

3.2 Adequacy of distribution conditions and restrictions

These distribution conditions make it likely that customers who are issued the product are in the target market because they are supported by reasonably appropriate platform controls, training and scripting designed to ensure that the product is distributed to persons within the target market.

4. Reviewing this target market determination

We will review this target market determination in accordance with the below:

Initial review	Within the 3 years of the effective date.
Periodic reviews	At least every 3 years from the initial review.
Review triggers or events	Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but not limited): • a material change to the design or distribution of the product, including related documentation or policies; • A material change to Athena's Credit Policy; • where 1% or more of our total borrowers (joint borrowers to be treated as a single borrower) experience financial difficulty at any one time; • evidence, as determined by Athena, of the performance of the product, in practice, that may suggest that the product is not appropriate for the target market • reporting from Distributors, or consistent feedback from Distributors on the target market which suggests that the determination may no longer be appropriate; • the occurrence of a significant dealing in the product outside the target market; • where the distribution conditions are found to be no longer be appropriate; • external events occur, such as adverse media coverage or regulatory attention; where 1% or more of our total borrowers (joint borrowers to be treated as a single borrower) are in arrears and/or in hardship; • where we receive over 10 complaints in a calendar month that arise from product or distribution concerns; and • where we experience over 10 application withdrawals in a calendar month that arise from product or distribution concerns.

Where a review trigger has occurred, review of the target market determination will be completed within 10 business days.

5. Reporting and monitoring this target market determination

The table below sets out the kinds of information we need to identify, or those that Distributors who distribute our products need to provide us, to enable us to ensure that the TMD for these products continues to be appropriate.

Specific complaints	Distributors will report details of the complaint, including name and contact details of complainant and substance of the complaint. The Distributor must provide the information as soon as practicable but within 10 business days.
Number of complaints	Distributors will report to us the number of complaints received in relation to the product(s) covered by this TMD on a quarterly basis.
Information requested by Athena (e.g. sales and customer data)	Information reasonably requested by Athena. The Distributor must provide the information by the date requested by Athena.
Financial difficulty	Information about customers experiencing financial difficulty related directly to the unsuitability of the product of which the Distributor becomes aware. The Distributor must provide the information as soon as practicable but within 10 business days.
Dealings of product outside of TMD (significant dealing(s))	The details of any significant dealing(s) in the product outside the target market and a description of the significant dealing (eg, why it is not consistent with the TMD). The Distributor must provide the information as soon as practicable but within 10 business days.
Any feedback, regulatory order or directions received from a Regulator or AFCA in respect of the product or its distribution	Distributors will report this information as soon as practicable but within 10 business days.

We're here to help

If you have any question about this document or would like to talk to us about our home loans.

Local call 13 34 34

SMS 0483 900 880

hello@mortgagechoice.athena.com.au