

Target Market Determination

Offset Transaction Account

Start date:	18 December 2024
Next review due:	By 23 April 2026
Review period:	At least every 24 months from the start date of this Target Market Determination

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).

Why does Bankwest 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. Bankwest 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 an offset facility for the purpose of reducing the amount of interest payable under a linked Bankwest home loan	<p>Credit balances in the account reduce the balance on which interest is charged on a linked eligible Bankwest home loan.</p> <p>Note – This offset benefit will only arise where the customer has funds in the offset account.</p>
Require a transaction account for everyday use with a range of features allowing customers to conveniently make or receive payments and access cash	<p>Customers can transact on the account using:</p> <ul style="list-style-type: none"> - Card (Platinum Debit Mastercard / Debit card (EFTPOS)*); - Bankwest Online Banking / Bankwest App/ Online Business Banking; - Phone Banking; - Direct Debit Facility; - PayTo; - Periodical Payment; - PayID; - Staff assisted channels – including, Contact Centre and participating Australia Post outlets; and - ATMs / Cash. <p>*Effective 28 November 2024, Bankwest Debit Cards (EFTPOS) are not issued except to replace or reissue an existing Bankwest Debit Card.</p>
No honour fee or dishonour fee	No honour fee or dishonour fee.
Does not require a formal overdraft facility	The account does not have a formal overdraft facility, but Bankwest may overdraw the account to cover an unplanned shortfall in funds to meet a particular payment in circumstances where it is impossible or reasonably impractical for Bankwest to prevent the account from being overdrawn.

Financial Situation

The Financial Situation of the Target Market are customers that are likely to:

- maintain a sufficient balance in their Offset Account in order to benefit from the offset facility; and
- otherwise have funds available to deposit and transact.

Bankwest views that its processes in place will mean that the product will likely be consistent with the Financial Situation of the Target Market.

Eligibility criteria for the Product

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

- Be an individual (including trustee of a family trust) aged 18 years and above; and
- Be an Australian citizen or Australian permanent resident (limited exceptions may apply subject to conditions).

or

- Be an Australian corporate trustee as trustee for a family trust, (provided the corporate trustee is a non-trading entity) and the family trust beneficiaries are all individuals

and

- Where the customers want to access their funds, meet specific eligibility requirements that apply to those payments' products.

Additional eligibility criteria apply to customers who wish to open the product in joint names.

Distribution Conditions

Bankwest will have oversight over how the product is promoted and issued. The product can only be distributed to customers in accordance with Bankwest's product and process requirements. 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. Bankwest 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.

Distribution Channels	Conditions that make product distribution through the channel appropriate
<i>Proprietary:</i>	
Staff assisted channels (e.g., trained consultants, lenders, home lending specialists, private bankers and/or relationship managers). Limited exceptions and conditions may apply.	<p>Bankwest staff that distribute this product:</p> <ul style="list-style-type: none"> - are appropriately trained and accredited to meet Bankwest's qualification requirements; - understand and are able to discuss the features, rates/fees of the product and the key differences between deposit products; - must follow procedures that outline application eligibility and processes, including scripting; - have access to product resources such as comparison tools; and - are monitored through controls such as sample call/conversation monitoring or sampling applications for errors to ensure proprietary distribution adheres to procedures.
<p>Note: The sole distribution channel for an Offset Transaction Account to be issued to a trust borrower, is through a relationship manager.</p>	

Online channels (e.g., Bankwest App and Bankwest website) – availability dependent on customer status (existing or new) and product holding status (sole or joint account)

- The Bankwest App is the only online channel through which this product can be distributed – however an enquiry may be made through the Bankwest Website and will be directed through to a staff assisted channel.
- The Bankwest website provides customers with a comparison tool that assists customers to select a suitable product
- The Bankwest App and Bankwest Website provide information about the product with a summary of key benefits, and rates/fees, in an easy to navigate format.

Product is switched automatically to a Bankwest Easy Transaction Account

The Offset Transaction Account will be switched to a Bankwest Easy Transaction account if:

- The account ceases to be linked to an eligible Bankwest home loan, or
- The home loan to which it is linked is paid out and closed, or
- The account is not linked to an eligible Bankwest home loan as a Mortgage Saver Facility within 185 days from the date the account is opened.

Bankwest considers that the automatic switch from a Bankwest Offset Transaction Account to the Easy Transaction Account is appropriate as these products are relevantly identical (except for the ability to offset interest on a lending product).

Third Party:

Accredited third party brokers, as part of a home lending application

Bankwest only permits third parties to distribute this product who are approved aggregators and their authorised brokers who have been accredited by Bankwest. Bankwest also required that:

- Aggregators responsible for third party brokers involved in the distribution of the product comply with their agreement in place with Bankwest and must procure compliance by their authorised brokers with:
 - Bankwest's mortgage broker requirements; and
 - Their legal obligations, which includes the obligation for brokers to act in the best interests of their client when providing credit assistance
 - Third party brokers meet Bankwest's accreditation requirements which includes holding appropriate qualifications, industry membership and authorisations to engage in credit activities, as well as completion of background checks.

If aggregators and their authorised brokers fail to comply with the above requirements, it may result in Bankwest terminating their authority to distribute this product.

Review Triggers

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, Bankwest 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"> - the reduction of interest charged on the linked Bankwest home loan is less than the amount paid in monthly offset fees - product being used for business purposes.

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"> - distribution (e.g., misrepresentation or mis-selling from staff); - product suitability (e.g., sale of an Offset Transaction Account to a customer who does not have a Bankwest Home Loan) and - product attributes (e.g., sale of an Offset Transaction Account to a customer who preferred a savings account).
Incident Data	A material incident or significant number of incidents in relation to the product's design or distribution, identifying potential breaches of our legal or regulatory obligations.
Changes to the Product	A 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).
Significant Dealings	Any significant dealing of the product to customers who are outside of the Target Market.
Notification from ASIC	The receipt of a product intervention power order from ASIC requiring Bankwest to immediately cease retail product distribution conduct in respect of the product.

Review Trigger Information Reporting Requirements

The following information must be provided to Bankwest by all third parties responsible for the retail product distribution conduct of this product in accordance with this TMD, within the required timeframes:

Information Type	Description	Time Frame for Reporting
Product complaints data	Information relating to complaints received including number of complaints, third party name, product name and complaint verbatim.	Quarterly and in any case no later than 10 business days from the end of the quarter.
Significant Dealings	Any significant dealing of the product to customers who are outside of the Target Market.	As soon as practicable and in any case no later than 10 business days after becoming aware.

Product Issuer: Bankwest, a division of Commonwealth Bank of Australia ABN 48 123 123 124 AFSL and Australian Credit Licence 234945.