



TARGET MARKET DETERMINATION

USPEND ACCOUNT

Determination Criteria	Description	
Start Date:	16/10/2021	
First and ongoing review period:	The first review, and each ongoing review, must be completed within each consecutive 12 month period from the Start Date.	
Product:	USpend Account An online transaction account to deposit funds intended for day-to-day expenses with no monthly account or transaction fees and the ability to earn interest.	
TARGET MARKET		
Target market & product attributes	Consumer needs and objectives	Product Attributes
	A person that wants an online transaction account to deposit funds intended for day-to-day expenses with no monthly account or transaction fees and the ability to earn interest.	This account provides the ability to: <ul style="list-style-type: none"> • use the product to deposit funds • earn conditional bonus interest on linked saving accounts • perform online transactions • make day-to-day transactions • have at call access to funds • have access to UBank Visa Debit Card. This account has no monthly account or transaction fees. This account requires a mandatory USave account.
	A person that wants transaction account with access to a debit card and ability to make payments to another NAB account or account at another financial institution.	Product inclusions: A non-cash payment facility used to make payment with a debit card including: <ul style="list-style-type: none"> • UBank Visa Debit Card <ul style="list-style-type: none"> - no UBank international transaction fee - no UBank foreign ATM fee. Non-cash payment facilities to make payment to another NAB account or an account at another financial institution using payment platforms including: <ul style="list-style-type: none"> • BPAY • New Payments Platform {NPP} • Direct Debit • Periodical payment • Mobile wallets.
	Consumer financial situation	Product attributes
A person that: <ul style="list-style-type: none"> • is likely to have funds available to deposit and wants the ability to earn interest on deposited funds • is seeking no monthly account or transaction fees. 	This transaction account has no monthly account or transaction fees.	



TARGET MARKET DETERMINATION

USPEND ACCOUNT

<p>Appropriateness statement:</p>	<p>NAB has considered that the product including its key attributes is appropriate for the target market including the likely objectives, financial situation and needs of consumers in the target market.</p>
<p>DISTRIBUTION CONDITIONS</p>	
<p>Authorisation: This condition applies to all conduct</p>	<p>Condition 1</p> <p>A distributor must:</p> <ul style="list-style-type: none"> • hold an appropriate Australian Financial Services Licence (AFSL) or be an authorised representative of a AFSL holder unless an exemption applies covering the provision of financial services in respect of the product; and • if the distributor is not UBank: <ul style="list-style-type: none"> - comply with the terms and conditions of any relevant distribution agreement or arrangement with UBank - if applicable, comply with the terms of any licensing exemption covering the provision of financial services in respect of the product. <p>This condition is appropriate as it ensures distributors are appropriately authorised to provide the relevant regulated financial services and will comply with the commercial terms agreed between the distributor and UBank.</p>
<p>General Advice including Marketing: This condition applies to general advice to general advice (including most marketing)</p>	<p>Condition 2</p> <p>A distributor must only provide general advice (such as marketing) if:</p> <ul style="list-style-type: none"> • a Target Market Determination (TMD) has been made and published for the product and has not been withdrawn • the distributor complies with the terms of the TMD for the product • the general advice is consistent with the consumer needs, objectives and financial situation defined in the target market for the product; and • ASIC has not issued a Product Intervention Power restricting the publication of general advice for the product by the distributor. <p>A distributor may provide general advice (marketing) as to the product through public channels such as:</p> <ul style="list-style-type: none"> • television, radio, the internet (including social media), billboards and physical banners, brochures and other marketing material available to the general public • advertising through comparison sites and rating agencies • UBank’s Mobile Application • UBank’s Website. <p>This condition is appropriate as the target market is wide.</p> <p>It is intended that these channels may be available to persons who would not at that time qualify for the product to be issued to them in a regulated sale, for example because they are minors or do not have the income to service the product. This is because the issue of the product is subject to Distribution Conditions 3 and 4 which will ensure that the product is only issued to persons for whom it will be appropriate.</p>
<p>Retail Product Distribution Conduct (other than General Advice): These conditions apply to all retail product distribution conduct that is not general advice</p>	<p>Condition 3</p> <p>A distributor must only engage in retail product distribution conduct (other than general advice) if:</p> <ul style="list-style-type: none"> • a TMD has been made and published for the product and has not been withdrawn • the distributor complies with the terms of the TMD for the product • ASIC has not issued a Product Intervention Power restricting the distribution of the product for the distributor; and • the distributor has complied with Condition 4.



TARGET MARKET DETERMINATION

USPEND ACCOUNT

	<p>A distributor must only engage in retail product distribution conduct (other than general advice) through:</p> <ul style="list-style-type: none"> • UBank’s Mobile Application • UBank’s Website • Limited circumstances through interaction hub. <p>This condition is appropriate as the target market is wide. It is also appropriate as the issuer has distributed this product using these methods, with limited risk to consumers.</p> <p>Condition 4</p> <p>A distributor must only engage in retail product distribution conduct (other than general advice) if they have identified:</p> <ul style="list-style-type: none"> • that the distribution of the product is consistent with the needs, objectives and financial situation defined in the target market for the product • that the person is seeking access to a transaction account with the following key attributes: <ul style="list-style-type: none"> - use the product to deposit funds - earn conditional bonus interest on linked saving accounts - perform online transactions - make day-to-day transactions - have at call access to funds - have access to UBank Visa Debit Card • that the person is seeking no monthly account or transaction fees. • the key difference between: <ul style="list-style-type: none"> - the product (including the specific product option requested by the consumer); and - the other product options for the product and other separate deposit products issued by UBank. <p>This condition is appropriate as it requires a distributor to confirm that the consumer is in the target market.</p>				
<h3>REVIEW TRIGGERS</h3>					
<p>Review triggers:</p>	<p>NAB and any distributor of this product, must cease all retail product distribution conduct (except excluded conduct) in respect of this product within 10 business days of NAB identifying a review trigger unless:</p> <ul style="list-style-type: none"> • NAB has determined that this TMD continues to be appropriate; or • a new TMD has been made. <p>The events and circumstances described below will trigger a review of this TMD if NAB determines it may relate to the appropriateness of the TMD having regard to NAB’s internal policies.</p> <p>NAB will publish notice of a review on its website.</p> <table border="1" data-bbox="379 1691 1508 2076"> <tr> <td data-bbox="379 1691 571 1809"> <p>Material complaints</p> </td> <td data-bbox="571 1691 1508 1809"> <p>NAB actively monitors consumer complaints and will review the appropriateness of the TMD where complaints in number or significance relate to consumer understanding of risks, key terms, conditions or features of this product.</p> </td> </tr> <tr> <td data-bbox="379 1809 571 2076"> <p>Product Performance</p> </td> <td data-bbox="571 1809 1508 2076"> <p>NAB actively monitors product performance indicators relevant to the product and will review the appropriateness of the TMD in circumstances where:</p> <ul style="list-style-type: none"> • evidence shows that consumer usage is significantly different from original issuer expectations (e.g. a different product purpose) • evidence shows that product is no longer meeting the financial situation, needs and objectives of the target market for whom the product was designed • evidence shows of substantial sales outside of the Target Market. </td> </tr> </table>	<p>Material complaints</p>	<p>NAB actively monitors consumer complaints and will review the appropriateness of the TMD where complaints in number or significance relate to consumer understanding of risks, key terms, conditions or features of this product.</p>	<p>Product Performance</p>	<p>NAB actively monitors product performance indicators relevant to the product and will review the appropriateness of the TMD in circumstances where:</p> <ul style="list-style-type: none"> • evidence shows that consumer usage is significantly different from original issuer expectations (e.g. a different product purpose) • evidence shows that product is no longer meeting the financial situation, needs and objectives of the target market for whom the product was designed • evidence shows of substantial sales outside of the Target Market.
<p>Material complaints</p>	<p>NAB actively monitors consumer complaints and will review the appropriateness of the TMD where complaints in number or significance relate to consumer understanding of risks, key terms, conditions or features of this product.</p>				
<p>Product Performance</p>	<p>NAB actively monitors product performance indicators relevant to the product and will review the appropriateness of the TMD in circumstances where:</p> <ul style="list-style-type: none"> • evidence shows that consumer usage is significantly different from original issuer expectations (e.g. a different product purpose) • evidence shows that product is no longer meeting the financial situation, needs and objectives of the target market for whom the product was designed • evidence shows of substantial sales outside of the Target Market. 				



TARGET MARKET DETERMINATION

USPEND ACCOUNT

	Feedback from distributors	Reporting received from distributors, or consistent feedback from distributors which suggests that the target market or key product attributes may no longer be appropriate. Refer to Reporting.
	Substantial Product Change	NAB makes a substantial change to the product terms, conditions or key product attributes including: <ul style="list-style-type: none"> • adding to, removing or changing a product attribute • a substantial pricing change which impacts the consumer value proposition of the product • significant changes to a distribution channel and distribution strategy.
	Significant Change to the External Environment	<ul style="list-style-type: none"> • Regulatory or legislative environment for this product. • Economic and market conditions.
	Notification from ASIC	NAB receives a notification from ASIC requiring immediate cessation of product distribution, or cessation of particular conduct in relation to the product.
	Significant Dealings	Evidence that the distribution of the product or distributor conduct are significantly different to the expectations set out in the TMD.
REPORTING		
Reporting period:	The Reporting Period for this determination is quarterly during each calendar year: <ul style="list-style-type: none"> • First reporting period ending on 31 March. • Second reporting period ending on 30 June. • Third reporting period ending on 30 September. • Fourth reporting period ending on 31 December. 	
Reporting information:	A distributor must provide the following information in writing as soon as practicable, or within 10 business days after the reporting period unless otherwise specified.	
	Complaint Information	Complaints related to the risks, key terms, conditions or key attributes of this product including: <ul style="list-style-type: none"> • the number of complaints • the nature and circumstances of the complaints • whether or not there has been or is likely to be consumer harm or detriment, and if so, the nature of the harm or detriment.
	Feedback from distributors	Feedback that the target market or key product attributes may no longer be appropriate and not meeting the likely needs and objectives and financial situation of the class of consumers in the target market.
	Significant Dealings	If a distributor becomes aware of a significant dealing in the product or an issue with distributor conduct, that is not consistent with the TMD, they must notify the issuer in writing as soon as practicable, and in any event within 10 business days after becoming aware.
	Other Information Requested by NAB	Any other information requested in writing by NAB from time to time subject to: <ul style="list-style-type: none"> • The request being necessary to enable NAB to meet its legal and compliance obligations; and • NAB providing at least 30 days prior notice before the end of the Reporting Period.

This product is issued by UBank, which is a division of National Australia Bank Limited ABN 12 004 044 937 AFSL and Australian Credit Licence 230686.