

## Orange Advantage

<b>Issuer</b>	ING Bank (Australia) Limited ABN 24 000 893 292, AFSL and Australian Credit Licence 229823.
<b>Date of TMD</b>	05 October 2021
<b>Target market</b>	<p><b>Description of target market</b></p> <p>The Orange Advantage is for customers who are individuals seeking a loan to purchase or refinance residential property that is to be paid off over time with regular payments. It has been specifically designed for:</p> <ul style="list-style-type: none"><li>• Customers who can provide residential property as security for the loan.</li><li>• Customers that wish to purchase or refinance residential property as either owner occupiers or investors.</li><li>• Customers who would like to make principal and interest and may also have the option to make interest only repayments for a period of the loan term.</li><li>• Customers who would like the flexibility to make extra repayments without charge.</li><li>• Customers who would like the flexibility to redraw funds that have been repaid early.</li><li>• Customers who want an offset facility.</li><li>• Customers who can satisfactorily demonstrate they can afford to repay the loan.</li></ul> <p><b>Description of product, including key attributes</b></p> <p>The Orange Advantage loan has the following key attributes that will impact whether it is likely to be appropriate for the target market:</p> <ul style="list-style-type: none"><li>• <b>Customer profile:</b> The Orange Advantage is only available to individuals that:<ul style="list-style-type: none"><li>- are 18 years of age or older;</li><li>- are an Australian citizen, New Zealand citizen or Australian permanent resident; and</li><li>- meet ING's credit lending guidelines;</li><li>- meet the identification requirements.</li></ul></li><li>• <b>Loan Term:</b> Term of loan up to 30 years.</li><li>• <b>Loan amounts:</b> The Orange Advantage provides for loan amounts from \$20,000 to \$3 million.</li><li>• <b>Repayment profile:</b> Customers make regular scheduled fortnightly or monthly repayments to pay down the loan balance over the term. Subject to credit assessment, the customer may request to make interest only payments for a maximum of 5 years for owner occupier loans and a maximum of 10 years for Investor loans.</li><li>• <b>Interest rate:</b> The Orange Advantage provides for a variable interest rate for the term of the loan.</li><li>• <b>Fees:</b> An ongoing annual fee payable to ING. Establishment fees, variation and late payment fees may also apply. There are no early repayment fees if the loan is repaid early.</li><li>• <b>Security:</b> The Orange Advantage must be secured by a property. In some circumstances a guarantee (subject to ING's credit lending guidelines) supported by property will also be considered.</li><li>• <b>Offset requirements:</b> The offset facility must be an ING Orange Everyday account that is linked to the Orange Advantage.</li></ul>



## Target market (continued)

- **Variation Options:** The Orange Advantage includes optional variations such as loan portability, substitution of security, principal reduction, an increase to the loan amount (subject to ING's credit lending guidelines) and repayment switch.

**Note:** In the instance of a loan split, in which a customer has the option to delegate loan amounts across more than one home loan product, conditions apply only to the portion of the loan in which is deemed an Orange Advantage.

### Description of likely objectives, financial situation and needs of customers in the target market

- **Likely objectives:** Customers who are seeking a home loan with a variable interest rate and the ability to make additional repayments, pay down the loan early, use an offset facility or redraw funds that have been repaid early.
- **Likely financial situation:** Customers who meet ING's credit lending guidelines.
- **Likely needs:** Customers who need funds to refinance an existing home loan or to purchase residential property for owner occupier or investor purposes.

### Classes of consumers for whom the product is clearly unsuitable

The Orange Advantage would not suit customers who do not meet ING's credit lending guidelines. For example, this could be someone who does not have a steady income, customers who are under the age of 18, customers who are not an Australian resident or customers who have expenses that indicate they cannot afford the loan. The Orange Advantage is not suitable for customers who require a fixed interest rate.

## Distribution conditions

### Distribution conditions

The Orange Advantage is distributed through the following channels:

- ING website;
- Directly via the ING Call Centre channel (who will also be the contact once an application is received via the ING website); and
- ING accredited brokers who:
  - hold an Australian Credit Licence ("ACL"); or
  - are a credit representative or employee of an ACL Holder.

Any advertising relating to the Orange Advantage is directed to an appropriate target market and considered as part of the product governance process. Currently, advertising of the Orange Advantage can occur through the following channels: television, print media, digital channels, direct electronic communications and telecommunications to customers whom have opted in to these communications.

Customers can communicate with the ING staff directly regarding the Orange Advantage through the call centre. ING call centre staff are trained to give information about the product but not advice around the suitability to a customer's individual situation and are required to follow scripting when communicating with a customer about the product.

Alternatively a customer can discuss the Orange Advantage directly with an ING accredited broker. ING takes steps to ensure that its accredited brokers hold the required qualifications and authorisations, carry out accreditation information sessions and receive guidance material in relation to ING's processes and procedures.

The Orange Advantage can only be offered to customers after ING collects the required customer information and applies its credit lending guidelines.

In case of a comparison site provider, information about the product on their site must direct prospective customers to review the relevant ING product information page and include details of where to find the TMDs.



### Distribution conditions (continued)

#### Why the distribution conditions and restrictions will make it more likely that the customers who acquire the product are in the target market

The distribution channels and conditions make it likely that the consumers who acquire the product are in the target market by:

- ensuring that customers will have been provided with sufficient information about the product;
- ensuring ING call centre staff are trained to understand the key product attributes and the target market for the products they discuss with customers;
- requiring customers to provide specific information, disclosure and evidence to confirm they meet eligibility requirements for the product and ING's lending criteria; and
- ensuring that only customers who meet the eligibility criteria for the product and our lending criteria are offered the product.

### Review triggers

The review triggers that would reasonably suggest that the TMD is no longer appropriate include:

- There is a significant dealing in the Orange Advantage which is not consistent with this determination.
- A significant increase beyond expected levels in complaints or a significant change in the nature of complaints relating to the product.
- There is a material change in the eligibility requirements for the product, our lending criteria or key features or terms and conditions of the product.
- There is a material change in the way we distribute the product.
- A material change in law, a court decision, or ASIC regulatory guidance that impacts the Orange Advantage.
- Any other event occurs or information is received that reasonably suggests the determination is no longer appropriate (for example, a proportionately high number of customers beyond expected levels pay out or refinance their loan within 2 years).

### Review periods

**First review date:** 05 October 2022

**Periodic reviews:** The TMD will be reviewed annually within each consecutive 12 month period.



**Distribution information reporting requirements**

Where ING acts as both the issuer and distributor of the Orange Advantage, this information will be collated internally.

Where an external distributor is involved (e.g. an accredited broker), the distributor must collect, keep records of and report the information set out in the table below:

Type of information	Description	Reporting period
<b>Customer complaints in relation to the product</b>	<ul style="list-style-type: none"> <li>- Number of complaints.</li> <li>- Substance of each complaint</li> </ul>	Quarterly within 10 business days of the quarter ending. <ul style="list-style-type: none"> <li>- 31st March</li> <li>- 30th June</li> <li>- 30th September</li> <li>- 31st December</li> </ul>
<b>Significant dealing(s)</b>	<ul style="list-style-type: none"> <li>- Date or date range of the significant dealing(s).</li> <li>- Description of the significant dealing (e.g. pattern of dealings in the product or distributor's conduct not consistent with TMD).</li> <li>- Why the significant dealing is not consistent with the TMD.</li> <li>- What was the root cause of the significant dealing.</li> <li>- Why the dealing is significant (e.g. actual or potential harm to customer/class of customer).</li> <li>- How the significant dealing was identified.</li> <li>- Steps taken/will be taken (if any) in relation to the significant dealing.</li> </ul>	As soon as practicable, and in any case within 10 business days after the distributor becomes aware that the significant dealing has occurred.
<b>Information request</b>	Information reasonably requested by ING	As soon as practicable, and in any case within 10 business days of the request from ING
<b>Distributor feedback</b>	Information discovered or held by the distributor that suggests that the determination may no longer be appropriate	As soon as practicable, and in any case within 10 business days after the Distributor becomes aware that the determination may no longer be appropriate.

