

Orange One Low Rate Credit Card

Issuer	ING Bank (Australia) Limited ABN 24 000 893 292, AFSL and Australian Credit Licence 229823.
Date of TMD	28 March 2025
Target market	<p>Description of target market</p> <p>The Orange One Low Rate Credit Card is for customers who are seeking credit for making purchases or obtaining cash advances through a card. It has been specifically designed for:</p> <ul style="list-style-type: none">• Customers who want a low interest rate credit card.• Customers who would like a credit limit between \$1,000 and \$30,000.• Customers who meet the eligibility criteria. <p>Description of product, including key attributes</p> <p>The Orange One Low Rate Credit Card 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">• Customer profile/Eligibility criteria: The credit card is only available to individuals who:<ul style="list-style-type: none">- are the only account holder (the card is not available to joint applicants/borrowers);- are 18 years of age or older;- can evidence regular income e.g. payslips, PAYG, Superannuation statements;- are an Australian citizen, New Zealand citizen or Australian permanent resident;- have and maintain an Australian residential address;- have a good credit rating and meet our credit lending guidelines;- meet the identification requirements; and- hold an active Orange Everyday account, or request to open one along with their credit card application.• Repayment profile: Customers must pay the minimum monthly repayment and can make additional repayments at any time.• Interest rate: The product provides a low variable interest rate on both purchases and cash advances with an interest free period of up to 45 days on purchases.• Fees: The product currently has no annual fee. Other fees and charges may apply.• Other product features include:<ul style="list-style-type: none">- No ING International Transaction Fees for eligible customers.- Ability to use instalment plans to repay purchases over time at a lower interest rate.- For customers who apply and are approved for a credit limit of \$6,000 or above they will be issued with an Orange One Low Rate Platinum credit card and have access to complimentary international travel insurance. <p>Description of likely objectives, financial situation and needs of customers in the target market</p> <ul style="list-style-type: none">• Likely objectives: Customers who are seeking a credit card with a lower interest rate.• Likely financial situation: Customers who earn a regular income, have a good credit rating and otherwise meet ING's credit lending guidelines.• Likely needs: Customers who want the ability to access credit for spending on goods and services, and to meet their cash flow needs. Customers who would like a credit limit between \$1,000 and \$30,000.

Target market (continued)	<p>Classes of consumers for whom the product is clearly unsuitable</p> <p>This Orange One Low Rate credit card would not suit customers who:</p> <ul style="list-style-type: none"> - are self-employed or do not otherwise meet ING's credit lending guidelines; - require a credit card for business purposes; - wish to take out a credit card jointly with another person (as it is only available to individuals); - require a balance transfer from an existing credit card; - do not want to use online banking, noting that ING does not provide branch services; - do not wish to hold an Orange Everyday account; and - require a legal representative or appointment of representative to act on their behalf who requires full online banking access and functionality (representatives can only access the account they are authorised for over the phone or in writing).
Alignment to target market	<p>ING considers that the Orange One Low Rate credit card is likely to be consistent with the likely objectives and needs of the class of customers in the target market. ING's application and assessment processes support that the Orange One Low Rate credit card is likely to reach customers in the target market.</p>
Distribution conditions	<p>Distribution channels</p> <p>The Orange One Low Rate Credit Card can only be distributed through the following channels:</p> <ul style="list-style-type: none"> ▪ ING website including campaign sites; ▪ the ING internet banking app; and ▪ Third parties (such as comparison websites) who are appointed by ING to provide customers with information about the key attributes of the product and direct customers to the ING website and other ING webpages. <p>Distribution conditions</p> <p>Any advertising relating to the Orange One Low Rate Credit Card is directed to an appropriate target market and considered as part of the product governance process. Advertising of the Orange One Low Rate Credit Card can occur through a variety of channels, including by way of direct marketing to customers who have opted in to marketing communications.</p> <p>Customers can communicate with ING staff directly regarding the Orange One Low Rate Credit Card through the ING contact centre. ING contact centre staff are trained to give information about the product but not advice around the suitability to a customer's individual situation; they are required to follow scripting when communicating with a customer about the product.</p> <p>Where the Orange One Low Rate Credit Card is distributed through an online channel (such as the ING website and ING internet banking app), the customer will be able to access information about the product attributes (such as fees, rates and credit limits) and eligibility criteria.</p> <p>The Orange One Low Rate Credit Card can only be offered to customers after ING collects the required customer information and applies its credit lending guidelines.</p>



Distribution conditions (continued)	<p>Why the distribution conditions and restrictions will make it more likely that the customers who acquire the product are in the target market</p> <p>These distribution conditions and restrictions which are applied to distribution channels mean that:</p> <ul style="list-style-type: none">the Orange One Low Rate Credit Card can only be offered directly through ING, anddirect communications regarding the Orange One Low Rate Credit Card occur only through:<ul style="list-style-type: none">authorised ING staff who have received appropriate training (including ING contact centre staff who are required to follow scripting to ensure ING meets its regulatory obligations), orthe ING website, other ING controlled webpages, or the ING internet banking app. <p>ING applies affordability and suitability checks on customers in accordance with credit lending guidelines to help ensure customers are not offered an unsuitable product, and that distribution is likely to be directed at consumers who fall within the target market.</p>						
Review triggers	<p>The review triggers that would reasonably suggest that the TMD is no longer appropriate and would trigger a review of the TMD by ING are:</p> <ul style="list-style-type: none">An unexpected increase in customer financial difficulty indicators.An unexpected increase in the volume of Orange One Low Rate credit card account closures prior to the account being used.An unexpected increase in the volume of complaints from customers who acquired the Orange One Low Rate credit card relating to the suitability and attributes, or distribution of the product.There is a significant dealing in the Orange One Low Rate Credit Card which is not consistent with this TMD.A material change to the Orange One Low Rate Credit Card (including the key features) or the terms and conditions of the Orange One Low Rate Credit Card occurs.A material change in law, a court decision, or ASIC regulatory guidance that impacts the Orange One Low Rate Credit Card.Any other event occurs or information is received that reasonably suggests the determination is no longer appropriate.						
Review periods	<p>Next periodic review date: 4 October 2025</p> <p>Periodic reviews: The TMD will be reviewed annually within each consecutive 12 month period.</p>						
Distribution reporting requirements	<p>Where ING acts as both the issuer and distributor of the Orange One Low Rate Credit Card, it will internally collate the information required to determine whether a review trigger has occurred. This is such as, the number of complaints and the substance of complaints, and whether a significant dealing has occurred.</p> <p>Any third party appointed by ING must collect, keep records of and report the information set out in the table below:</p> <table><tr><th>Type of information</th><th>Description</th><th>Reporting period</th></tr><tr><td>Complaints</td><td>Number and substance of complaints and general feedback relating to the Orange One Low Rate product and its performance.</td><td>Quarterly within 10 business days of the quarter ending.<ul style="list-style-type: none">31st March30th June30th September31st December</td></tr></table>	Type of information	Description	Reporting period	Complaints	Number and substance of complaints and general feedback relating to the Orange One Low Rate product and its performance.	Quarterly within 10 business days of the quarter ending. <ul style="list-style-type: none">31st March30th June30th September31st December
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Distribution reporting requirements (continued)	Type of information	Description	Reporting period
	Significant dealing(s)	<ul style="list-style-type: none"> - Date or date range of the significant dealing(s). - Description of the significant dealing (e.g. pattern of dealings in the product or distributor's conduct not consistent with TMD). - Why the significant dealing is not consistent with the TMD. - Why the dealing is significant (e.g. actual or potential harm to customer /class of customer). - How the significant dealing was identified. - Steps taken/will be taken (if any) in relation to the significant dealing. 	As soon as practicable, and in any case within 10 business days after the distributor becomes aware that the significant dealing has occurred.
	Information request	Information reasonably requested by ING.	As soon as practicable, and in any case within 10 business days after the request.
	Distributor feedback	Information discovered or held by the distributor that suggests that the TMD may no longer be appropriate.	As soon as practicable, and in any case within 10 business days after the distributor becomes aware that the TMD may no longer be appropriate.

