

## Target Market Determination

### ClearCash – Continuing Credit Contract

This Target Market Determination ('TMD') is issued by Credit Corp Financial Services Pty Limited ABN 39 146 525 706, trading as "ClearCash", Australian Credit Licence 400871 ('Credit Corp').

This TMD applies to:

**Product:** ClearCash – Continuing Credit Contract  
**Effective Date:** 27/11/2025  
**Version:** 2.6  
**Approved by:** Product Governance Committee

This TMD describes the class of customers the product has been designed for, the conditions under which it will be distributed and how we will review this document to ensure it remains appropriate.

### Product Description

The ClearCash product is designed to appeal and provide benefit, to a broad range of consumers who have a need or desire for a loan of between \$500 and \$8,000 and who can meet the repayments under the loan without substantial hardship.

The product is offered exclusively online at [www.clearcash.com.au](http://www.clearcash.com.au).

The product includes sustainable repayments, with interest rates below the caps applicable to mainstream consumer lending.

Late Payment fees are subject to conservative caps, calculated at \$1.00 per day the account is overdue, capped at \$100.00 per rolling 12 month period and subject to a 14 day grace period. A \$0.55 Dishonour Fee is also payable in the event that a direct debit is not honoured.

The broad appeal of the product is due, in part, to the simple, user friendly, online application process, the speed in which lending decisions are made and, where approved, the speed to disbursement and the ease of managing the account.

The product also offers a redraw feature, which allows eligible consumers to apply to redraw on available credit within their approved credit limit as they pay down the balance of the loan. Use of the redraw feature is an optional value add feature and can only be accessed via an application and an updated eligibility assessment. Not all members of the target market are expected to utilise the feature. The availability of the feature does not add cost to the product, other than, where utilised, the interest charges on the additional amount borrowed. Consumers do not need to utilise the redraw facility to derive benefit from the product.

## Target Market

### Eligibility Requirements

The ClearCash product is designed for a class of consumers who meet the following eligibility requirements ('**Eligibility Requirements**') being consumers who:

- are aged 18 years or over;
- are able to evidence 90 days of transaction data through online bank statements;
- are able to satisfactorily prove their identity in line with our obligations under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* ('AML Act');
- hold a bank account with an Australian Authorised Deposit-taking Institution ('ADI') which can be verified and which funds can be disbursed to and debited from;
- are resident in Australia
- are not identified as likely to have a gambling problem;
- are not subject to a current insolvency agreement; or
- have not declared or not been declared bankrupt in the past 2 years; and
- meet our credit assessment criteria.

### Needs and Objectives

The ClearCash product is designed for consumers who:

- want a loan between \$500 and \$8,000;
- want a loan with an interest rate within the caps applicable to mainstream consumer lending;
- want a credit facility with the ability to redraw on available credit within the credit limit;
- want or need fast access to funds;
- want to be able to repay early with no financial penalty; and
- want a loan they can apply for, access and manage online.

### Financial Situation

The ClearCash product is designed for consumers who:

- not more than 50% of their total income is derived from a pension, carer, or jobseeker allowance;
- have the income and capacity to meet the repayments under the loan contract without substantial hardship, which capacity is sought to be ascertained through consumers meeting our credit assessment criteria; and
- are not considered likely to experience a change of circumstances which will impact their ability to meet their repayments under the loan.

### Excluded Consumers

ClearCash is not designed for consumers within the negative target market.

The negative target market is comprised of consumers:

- who are less than 18 years of age;
- who do not meet the credit assessment criteria;
- whose needs and objectives are not met by the product;
- who are unable to prove their identity for the purposes of the AML Act;
- who do not hold a bank account with an Australian based ADI;
- who are recipients of a pension, carer or jobseeker allowance and such benefits comprise greater than 50% of their total income;
- who are identified as potentially suffering a gambling problem;
- who are subject to a current insolvency agreement; or

- who have declared or been declared bankrupt in the past 2 years.

## Target Market Assessment of Appropriateness

We have assessed that the ClearCash product is likely to be consistent with the likely objectives, financial situation and needs of consumers within the Target Market because the key attributes of the product enable consumers who are within the Target Market to satisfy the above stated needs and objectives at a cost that is both reasonable and affordable.

## Distribution

### Distribution Channels

The ClearCash product is only distributed through the ClearCash website, [www.clearcash.com.au](http://www.clearcash.com.au). Agreements are also in place with third-party referral partners. Regardless of the referral channel, all lending assessments and approvals are completed directly by Credit Corp.

### Advertising

The product may be advertised:

- on the ClearCash website;
- on television, broadcast video on demand and streaming video on demand services;
- on radio and podcasts;
- through paid digital ads;
- through social media;
- through comparison websites;
- through affiliate partners; and
- by email or SMS to customers who have consented to receive such communications.

The following restrictions are in place in relation to advertising:

- All advertisements must be consistent with this Target Market Determination and must not contain content that states or implies that consumers who fall within the negative target market specified in this Target Market Determination may apply.
- Advertising in certain venues is also not permitted, such as in casinos, pubs and clubs.
- Television and radio advertising is restricted to ensure that advertising is not presented during segments targeted at minors, or that relate to gambling.
- Keyword campaigns for online marketing through Google Ads must be designed so as not to be directed at consumers who are not within the target market. Negative keyword matching must be used where available to reduce the likelihood that a class of consumers outside of our target market will be encouraged to apply. Smart bidding ensures that advertisements are not presented to consumers who have been recently declined or to customers with IP addresses that suggest they are outside of Australia.

### Distribution

The product can only be distributed to consumers by Credit Corp staff who are appropriately trained. The product will not be distributed to consumers by any other third parties outside of the Credit Corp Group.

Consumers are provided with information on our website, both before and during the application process to assist them in understanding the product attributes and to consider whether it meets their needs and objectives.

All applications are assessed using the credit assessment criteria which seeks information (both from the consumer and third party sources) to establish whether the consumer is within the Target Market, including:

- because the applicant is assessed to meet the Eligibility Requirements,
- the product will meet their needs and objectives, and
- the product will not be unsuitable based on their financial situation.

We have implemented controls to ensure the product is not distributed to consumers outside of the Target Market. The credit assessment process has been configured to reject any application from a consumer who falls outside of our Target Market.

## Distribution Assessment of Appropriateness

We have assessed that the above described distribution conditions are appropriate to direct the distribution of the ClearCash product to its Target Market. This is because:

- the product is simple in nature and easy for consumers to understand;
- advertising is targeted to reasonably avoid consumers outside of the Target Market;
- all applications for the product are subject to the credit assessment criteria which has been configured to reject applications from consumers who fall outside of the Target Market.

## Review Triggers

We consider review triggers that reasonably suggest the Target Market Determination is no longer appropriate include:

- material changes to the terms and conditions of the product;
- where customer complaints alleging that the loan was unsuitable by reason of the product features or terms exceed the expected upper threshold;
- where Credit Corp becomes aware, of a significant dealing in the financial product that is not consistent with the Target Market Determination;
- where complaint volumes in relation to lending/distribution decisions exceed the expected upper threshold;
- where any complaint investigation reveals a potential serious or systemic issue in relation to the design or distribution of the product;
- where any audit of its distribution network reveals serious or systemic non-compliance with any of its Design and Distribution Obligations in relation to the product;
- where overall delinquency rates increase above the expected upper threshold for the product, absent any relevant macro-economic causation;
- where the percentage of loans entering into arrears in any month increase above the expected upper threshold, absent any relevant macro-economic causation;
- where Credit Corp receives any whistleblower report alleging serious or systemic non-compliance with any of its Design and Distribution Obligations in relation to the product;
- where Credit Corp receives any contact from a regulator or the Australian Financial Complaints Authority, alleging potential serious or systemic noncompliance with its Design and Distribution Obligations in relation to the product;
- where regulatory guidance, feedback or enforcement activities in the sector give reasonable grounds to believe that the Target Market Determination or distribution of the product should be reviewed.

Where a review trigger refers to a threshold, we have internally set review thresholds and we monitor performance against those thresholds in our regular governance meetings.

## Information Reporting

The following table sets out the information which is to be reported to us in respect of this product, via the Head of Lending, by persons who engage in retail distribution conduct in respect of the product. Unless otherwise noted, the first reporting period commences on the date this Target Market Determination is made and each subsequent reporting period commences at the conclusion of the prior reporting period.

Information required to be reported	Frequency of reporting period
The number of complaints received in relation to the product, the nature of the complaints and general feedback received relating to the product and performance	Quarterly
Any dealings (whether significant or not) outside of the Target Market Determination	As soon as practicable and in any case within 10 business days
Any incident of consumer detriment identified, which relates to the product	As soon as practicable and in any case within 48 hours.
Any breach of a compliance obligation, such as a breach of a distributor's obligations in relation to the Design and Distribution Obligations or the NCCPA ('Compliance Obligations')	As soon as practicable and in any case within 48 hours.
Any investigation by a regulator or AFCA in relation to the distributor's compliance with the Compliance Obligations	As soon as practicable and in any case within 48 hours.
Any anticipated inability of a distributor to comply with the Compliance Obligations.	As soon as practicable and in any case within 48 hours.

All distributors are contractually required to communicate any complaints received in relation to the product as soon as reasonably practicable and in any event, within 48 hours of receipt of the complaint.

## Review

- Initial Review:** The initial review of this Target Market Determination will take place on or before 5 October 2026
- Review Period:** The Target Market Determination will be reviewed and updated every 12 months from the initial review, unless a trigger event occurs, requiring earlier update. The 12 month review cycle has been selected on the basis of the relative simplicity of the product, together with the long history over which it has been offered and monitored.

## Questions

If you have any questions about our credit products or this TMD, click [here](#) to contact us online, or contact us by phone on **1300 798 057** or by email to [clearlybetterservice@clearcash.com.au](mailto:clearlybetterservice@clearcash.com.au).

*This document is not to be treated as a full summary of the products terms and conditions and is not intended to provide financial advice. Consumers must refer to any supporting documentation which outline the relevant terms and conditions under the product when deciding about this product.*