

Target Market Determination: Citi Ready Credit including the linked non-cash payment facilities (the Product)

This Product and Target Market Determination (**TMD**) is issued by National Australia Bank Limited (ABN 12 004 044 937, AFSL and Australian Credit Licence 230686) (**NAB**) on 1 March 2024 under section 994B(1) of the *Corporations Act 2001* (Cth) (**Act**). NAB has acquired the business relating to this Product from Citigroup Pty Limited (ABN 88 004 325 080, AFSL and Australian credit licence 238098) (**Citi**) and has appointed Citi to provide transitional services. "Citi", "Citibank", "Citigroup", the Arc design and all similar trade marks and derivations thereof are used temporarily under licence by NAB from Citigroup Inc. and related group entities.

1. P	roduct	Citi Ready Credit including the linked non-cash payment facilities (the Product).			
	roduct verview	The Product is a line of credit facility that provides individuals with access to an ongoing credit facility with the ability to make purchases, cash advances and balance transfers and has no ongoing account keeping fees. There are Fixed Payment Options (FPO) available including for eligible cash advances and retail purchases.			
1	Target market and Product attributes	TARGET MARKET			
		Consumer needs and objectives	Product attributes		
		 An individual that needs a general-purpose line of credit with flexible payment options to: help them with immediate and ongoing cash flow needs; and/or help with purchases, expenses or events that are relatively large compared to the individuals regular income; and/or transfer the available balance to an Australian bank account or an eligible credit facility to access a promotional interest rate on a balance transfer or instalment loan. When the Product is not in use it should not accrue any fees or charges. 	 The Product is a line of credit facility that provides the ability to use credit: for consumer purchases using a linked scheme card; and/or for balance transfers; and/or the ability to convert balances or the available credit limit into instalment plans at discounted interest rates (subject to eligibility criteria); and/or access to cash without attracting cash advance fees using the funds transfer feature in online and mobile banking. The Product allows for balance transfers which can be used to transfer one or more credit balances or transfer funds from their Product to an Australian bank account in the customer's name at a promotional rate for a promotional term. Fees may also apply. Paying only the minimum due will not repay the balance transfer within the promotional period. 		

	Consumer needs and objectives	Product attributes	
		Ability for eligible individuals through Fixed Payment Options to convert and repay a particular Card Balance, retail purchase or drawn down cash amount in monthly instalments for a specific period to benefit from interest being charged at a lower APR. Fees may also apply. The Product only charges interest on credit that is used.	
	Consumer financial situation	Product attributes	
	 An individual that: requires a minimum credit amount of \$5,000 up to a maximum of \$75,000; needs an ongoing revolving line of credit facility which revolves at the Standard APR; has access to sufficient income to satisfy NAB's credit assessment requirements and to meet the following payments: any instalments that are due; the minimum monthly repayments (non-instalment related); and the establishment fee. 	This Product requires a minimum limit of \$5,000 and a maximum limit of \$75,000 This Product provides customers with the ability to reuse the line of credit up to the approved credit limit without the need to reapply. The monthly Minimum Payment Due is: 1. the greater of: a) \$25 or if the card balance is less than \$25, the card balance; or b) 2.00% of the card balance as at the end of the Statement Period (rounded up to the nearest dollar); 2. plus any Monthly Instalment, Fixed Payment Option fees on that statement, initial interest charge, or related interest on any of them that is part of a Fixed Payment Option for that month. An Establishment Fee of up to \$199 will be debited to the account on the date the first statement of account is issued after activating the account.	
4. Negative target	Not suitable for an individual who:		
market	a) needs or wants to use the Product for business or investment purposes;		
	b) requires fixed repayment plans with no ongoing access to credit; orc) is seeking a conventional credit card for day to day purchases with convention credit card features such as interest free days for, or earning reward points on ordinary retail purchases.		

5. Why it is reasonable to conclude that the Product is likely to be consistent with the likely objectives, financial situation and needs of individuals in the target market

The Product, if sold to individuals in the target market, is likely to be consistent with the likely objectives, financial situation and needs of those individuals because the key attributes of this Product are likely to be suitable for individuals in that target market for various reasons including that:

- a) where a balance transfer offer is made at the time of acquisition, the Product allows account holders to transfer up to 100% of the credit limit at the balance transfer interest rate to other Australian bank accounts or eligible non-Citi branded credit facilities; and
- b) the Product provides access to an ongoing available credit limit which is available to use via a scheme card for retail purchases, or the ability to make electronic transfers (cash advance) through Citi Online or Citi Mobile® App; and
- c) the Product offers the individual the option to repay eligible balances by instalment plans; and
- d) the Product does not charge account holders any ongoing account keeping fees (provided the account holder is enrolled to receive electronic statements) or cash advance fees when accessing cash from the Product; and
- e) the eligibility criteria and serviceability requirements are aligned with key product attributes including the minimum credit limit.

6. Distribution conditions

The Product is designed to be distributed through the following channels:

- online through Citi's website and via third party aggregators and partners, including unassisted online applications; and
- assisted applications through Citi branded call centres.

The following conditions and restrictions on retail product distribution conduct apply in relation to the Product in addition to any condition or restriction imposed by or under the Act:

- a) The Product may only be distributed to individuals who meet the Product eligibility criteria and serviceability requirements.
- b) Individuals must complete relevant questions prior to completing an application. The questions are designed to assist individuals to understand the Product attributes that are likely to meet their objectives.
- c) Third party distributors (e.g. aggregators and partners) may only distribute the Product if they are authorised to do so and then only in the manner described in that authorisation.
- d) Citi branded call centre staff may only distribute the Product if they are authorised to do so and then only in the manner permitted.
- 7. Why does the distribution conditions make it more likely that individuals who acquire the Product are in the target market?

If the Product is sold to an individual in accordance with the distribution conditions, it is likely that the individual is in the target market for reasons including that:

- a) the distribution conditions will facilitate distribution to individuals who meet the eligibility criteria and serviceability requirements for the Product;
- b) the disclosures and questions completed prior to applying for the Product make it more likely that individuals who acquire the Product are in the target market;
- authorised third party distributors are subject to contractual obligations which assist to make it likely that the Product is only distributed to individuals meeting eligibility criteria for the Product; and
- d) authorised Citi branded call centre staff have been trained to understand the Product and the relevant policies.

8. Events and circumstances (review triggers) that would reasonably suggest the TMD is no longer appropriate	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: NAB has determined that this TMD continues to be appropriate; or a new TMD has been made. The events and circumstances described below will trigger a review of this TMD if NAB determines the event or circumstance reasonably suggests the TMD is no longer appropriate.		
	Material complaints	NAB actively monitors consumer complaints and will review the appropriateness of the TMD where complaints in number or significance relate to: consumer understanding of the risks, key terms, conditions or key attributes of this Product; access to introductory offerings; or interest rates and other fees and charges; or distribution and sales practices; or there is a significant change in the overall number of complaints.	
	Product performance	NAB actively monitors product performance indicators relevant to the Product and will review the appropriateness of the TMD in circumstances where evidence shows that the financial situation of the consumers in the target market may not be met including: • individuals not using the introductory offer; • individuals experiencing disproportionate rate of delinquencies; • a disproportionate number of individuals are not demonstrating the ability to repay the introductory offer within the introductory term; or • individuals carrying a substantial non-promotional balance over an extended period.	
	Feedback from Distributors	Reporting received from Distributors, or consistent feedback from Distributors which suggests that the target market or Product attributes may no longer be appropriate. Refer to section 11.	
	Material changes to Product terms and conditions or key product attributes	 NAB makes a change to the Product terms, conditions or key product attributes including: adding to, removing or changing a product attribute; a substantial pricing change which impacts the customer value proposition of the Product; or significant changes to a distribution channel and distribution strategy. 	
	Significant change to the external environment	 Regulatory or legislative environment for this Product; or 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	A significant dealing in the Product that reasonably suggests the TMD is no longer appropriate.	

9. Review period	Next review date: 1 March 2025 Periodic reviews: within one year from the date the TMD is made or the most recent periodic review.	
10. Reporting period when the Distributor should provide information about complaints and significant dealings to NAB	 a) The reporting period for persons engaging in retail product distribution conduct in relation to the Product (Distributors) to report information about the number of complaints about the Product is monthly. b) Distributors must report if they become aware of a significant dealing in the Product that is not consistent with this TMD as soon as practicable but within 10 business days of becoming aware of that significant dealing. 	
11. Information	The following information must be provided to NAB by Distributors who engage in	

required from
Distributors to
enable NAB to
identify that the
TMD is no longer
appropriate

The following information must be provided to NAB by Distributors who engage in retail product distribution conduct in relation to this Product:

Kind of information	Description	Reporting period for reporting the information
Complaints	Number and substance of complaints and general feedback relating to the Product.	Monthly. Reporting timing: within 10 business days of the end of the reporting period.
Significant dealing(s)	Date or date range of the significant dealing(s) and description of the significant dealing (e.g. why it is not consistent with the TMD).	As soon as practicable but within 10 business days of becoming aware of the significant dealing.
An event or circumstance that has occurred that would reasonably suggest that the TMD is no longer appropriate	Date or date range of the event or circumstance and description of the event or circumstance (e.g. why it is not consistent with the TMD).	As soon as practicable but within 10 business days of becoming aware of the event or circumstance.

