



**Churchill Mortgage Management Pty Ltd**  
ACN 658 415 331 | Australian Credit Licence 558384

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## Target Market Determination – SMSF Loan - Variable

**Date:** 12 June 2026

This Target Market Determination (“**TMD**”) has been prepared in accordance with the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019* (Cth) and associated Regulations.

TMDs are designed to assist issuers to ensure that the financial products they issue are likely to be consistent with the *likely objectives, financial situation and needs* of the consumers for whom they are intended (the target market) and to assist distributors to ensure that financial products are distributed to the target market.

This TMD is general in nature and should not be construed as financial advice. Consumers should obtain independent advice prior to acquiring the product to ensure that it is appropriate for their particular *objectives, financial situation and needs*.

<b>Product</b>	<b>SMSF Loan - Variable</b>
<b>Issuer</b>	Churchill Mortgage Management Pty Ltd ACN 658 415 331 Australian Credit Licence 558384

<p><b>Target Market</b></p>	<p><b>Description of target market, including likely objectives, financial situations and needs:</b></p> <p>This product has been assessed as meeting the likely objectives, financial situation and needs of consumers who:</p> <ul style="list-style-type: none"> <li>• are trustees of a self-managed superannuation fund</li> <li>• Are over the age of 18 years of age</li> <li>• Are an Australian citizen or permanent resident</li> <li>• have a Financial Adviser and accountant who has recommended a Limited Recourse Borrowing Arrangement</li> <li>• have a 20% deposit or sufficient equity to require a loan of under 80% LVR (for up to 80% LVR limit)</li> <li>• have appropriate SGC contributions to fund any shortfalls in interest and expenses</li> <li>• own business premises and have been advised to purchase this in their SMSF with the use of leverage.</li> <li>• want to use leverage in their superannuation fund to purchase property</li> <li>• want to save money with a low rate and no ongoing fees</li> <li>• do not require a debit card and offset sub- account</li> </ul> <p><b>Explanation of why the product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market</b></p> <p>The Product is likely to be consistent with the <i>likely objectives, financial situation and needs</i> of consumers in the target market because the Product will enable consumers in the target market to or refinance an investment or business property at a cost that is reasonable and affordable with respect to their financial situation.</p> <p>The Product is also consistent with the needs and objectives of consumers who require the ability to make additional repayments.</p> <p>The Product has been designed to effectively operate within the Superannuation Industry Supervisions laws in regard to Limited Recourse borrowing arrangements.</p> <p><b>Description of likely objectives, financial situation and needs of consumers in the target market</b></p> <p>The Product has been assessed as meeting the <i>likely objectives, financial situation and needs</i> of consumers who:</p> <p><u>Likely objectives:</u> require a loan to purchase or refinance an investment property or business property for a self-managed superannuation fund, with Principal and Interest repayments.</p> <p><u>Likely financial situation:</u> meet our eligibility criteria, including (but not limited to):</p> <ul style="list-style-type: none"> <li>• are 18 years of age or older;</li> </ul>
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	<ul style="list-style-type: none"> <li>• have ongoing and stable employment; and</li> <li>• can afford to make the required repayments.</li> </ul> <p><i>Likely needs:</i> need funds to cover the purchase or refinance of an investment home for a self-managed superannuation fund.</p> <p><b>Description of product and key attributes</b></p> <ul style="list-style-type: none"> <li>• The Loan Advance is subject to lending criteria, the loan to value ratio in the property, gross rental income and SGC payments into the SMSF;</li> <li>• Minimum loan amount of \$200,000, maximum loan amount of \$2 million;</li> <li>• Minimum loan term of 7 years, maximum loan term of 30 years;</li> <li>• Repayment on weekly, fortnightly or monthly basis;</li> <li>• Digital Verification Service capability for verification of identity requirements;</li> <li>• Customer portal;</li> <li>• Customer support including phone, email and chat capabilities;</li> <li>• Electronic contract distribution and signature capability;</li> <li>• Unlimited additional repayments; and</li> <li>• Fees: <ul style="list-style-type: none"> <li>○ Security Assessment fee <ul style="list-style-type: none"> <li>▪ \$660 for value &lt;\$1 million</li> <li>▪ \$770 for value \$1 million to \$2 million</li> <li>▪ \$880 for value \$2 million to \$3 million</li> <li>▪ At cost for value &gt;\$3 million</li> <li>▪ +\$150 for regional postcodes; and</li> </ul> </li> <li>○ Application fee starting from \$2,200 for purchase and refinance.</li> <li>○ Legal fees of \$990 for document production.</li> </ul> </li> </ul> <p><b>Classes of consumers for whom the product may not be suitable</b> This product is unlikely to meet the needs, objectives and financial situation of consumers who do not meet our eligibility criteria, or who are not professionally advised by qualified financial advisers and/or accountants.</p> <p>Do not have equity in their SMSF to allow an 80% Loan to Value ratio or below and do not have sufficient SGC payments into their SMSF to support any likely shortfalls.</p>
<p><b>Restrictions on distribution</b></p>	<p>This product should not be distributed to consumers who do not meet the credit requirements for this loan</p>



<b>Review triggers</b>	<p>The events that may suggest that the TMD is no longer appropriate includes:</p> <ul style="list-style-type: none"> <li>• If the product details or terms and conditions change;</li> <li>• If the credit guidelines change;</li> <li>• A shift in political or legal landscapes that change the legality of gearing through SMSF</li> <li>• if a significant dealing of the Product to consumers outside the target market occurs; or</li> <li>• if there are a significant number of complaints received from consumers in relation to the Product that reasonably suggests that the TMD is no longer appropriate.</li> </ul>
<b>Review periods</b>	<p>The first review will occur 12 months after the introduction of this TMD, and this TMD will should be reviewed every 12 months thereafter.</p>
<b>Distribution information and reporting requirements</b>	<p>Distributors, who possess an appropriate Credit Licence must provide the issuer with the following information:</p> <ul style="list-style-type: none"> <li>• A fully completed application form and supporting documents to allow a credit assessment.</li> <li>• Churchill Mortgage Management considers this is an appropriate distribution channel because the nature of the target market and the requirement of all brokers to have the necessary training, skills and knowledge to assess whether the consumer is within the target market.</li> </ul>

### Reporting Requirements

The following information must be provided to Churchill Mortgage Management by distributors if they become aware of any of the following matters within the corresponding timeframe.

<b>Type of Information</b>	<b>What is reported</b>	<b>When it is reported</b>
Product complaints	<p>Information relating to complaints received about the product or the distribution of the product, including:</p> <ul style="list-style-type: none"> <li>• Number of complaints</li> <li>• Name and contact details of the complainant</li> <li>• Substance of the complaint</li> </ul>	As soon as practicable and in any event within 10 business days of receipt of the complaint
Feedback	Any feedback received about the product or the Distribution Conditions for the product	Every 3 months
Significant dealings	Date or date range of any significant dealing of the product outside the Target Market	As soon as practicable and in any event within 10 business days after becoming aware of the significant dealing



TMD version 1.1 dated 12 June 2026