

Target Market Determination:

Kogan Money Black Credit Card 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 17 March 2025 under section 994B(1) of the Corporations Act 2001 (Cth) (**Act**).

1. Product	Kogan Money Black Credit Card including the linked non-cash payment facilities.		
2. Product overview	The Product is a rewards credit card that provides individuals with a line of credit facility, the ability to earn Kogan Money Credit Card Rewards Points (Reward Points) and access to ancillary Kogan.com benefits, with up to 44 days interest free on retail purchases and no annual fee.		
3. Key attributes	The key attributes of the Product include: a. line of credit facility for personal use by Kogan.com account holders with a minimum credit limit of \$6,000 and no annual fee.		
	 b. three types of interest rates applicable to this Product: Retail Annual Percentage Rate (APR) of 21.99% p.a. which applies to retail purchases and related fees and interest and other fees and charges; 		
	 Cash Advance APR of 22.74% p.a. which applies to transactions where cash or its equivalent is obtained and related fees and interest; and 		
	 interest on introductory offers or Special Promotions (such as Balance Transfers), which may be at a lower rate than the Retail APR. 		
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- c. ability to access up to 44 days interest free on retail purchases through repayment of the Card Balance by the due date each month, otherwise interest is charged at the applicable APR.
- d. ability to earn uncapped Rewards Points for certain purchases.
- e. ability to redeem Rewards Points through Pay with Points at Kogan.com and/or for certain selected transactions via SMS, Kogan Money Credit Cards Online and the Kogan Money Credit Cards Mobile App.
- f. Kogan.com benefits such as free Kogan First membership, subject to eligibility requirements, limitations and exclusions.
- g. ability for eligible cardholders to transfer outstanding balances from other eligible credit facilities to benefit from interest charged at a lower APR for a specified period, after which the Cash Advance APR applies. Fees may also apply.
- h. the credit card can be used to make payments to others, such as retailers in store or online and via digital wallets. The credit card may be used to obtain cash via an ATM, pay bills through BPAY® using Online Servicing or by setting up recurring card instructions with merchants. Cardholders can obtain Product and account information and transact through Online Servicing.

4. Target market

The target market for the Product is individuals who:

- a. are seeking a line of credit facility for everyday spending to earn Reward Points and make use of additional benefits;
- b. are a Kogan.com account holder or intend to be a Kogan.com account holder;
- c. meet eligibility criteria and serviceability requirements for the Product; and
- d. are unlikely to hold substantial balances for prolonged periods except to take advantage of reduced interest rates and/or a Balance Transfer (including holding a Balance Transfer for longer than the period during which a reduced interest rate applies).

5. Negative target market

The Product is not suitable for individuals who:

- a. want a credit card without the ability to earn Reward Points;
 and
- b. do not meet the eligibility criteria and serviceability requirements for the Product.

6. Likely objectives, financial situation and needs of individuals in the target market

The likely objectives, financial situation and needs of individuals in the target market include:

- a. want to utilise a credit card as a payment method or as a line of credit for everyday spend, or take advantage of reduced interest rates and/or a Balance Transfer;
- need a credit card with a credit limit to meet cash flow needs;
- c. want to have a facility with no annual fee;
- d. want to earn Reward Points on Eligible Transactions to redeem points earned through Pay with Points at Kogan.com and/or make use of ancillary Kogan benefits;
- e. meet minimum serviceability requirements and other eligibility requirements linked to their financial situation (e.g. minimum income level); and
- f. are unlikely to carry a substantial balance on their credit card over a prolonged period and are able to afford the other fees and interest rates associated with the Product.
- 7. 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, including that:

- a. it can be:
 - utilised as a payment method or as a line of credit; and
 - used to execute Balance Transfers to obtain the benefit of lower interest rates;
- b. no annual fee applies to this Product;
- c. points can be earned and Rewards Points can be redeemed either through Pay with Points at Kogan.com and/or for certain selected transactions via SMS, Kogan Money Credit Cards Online and the Kogan Money Credit Cards Mobile App; and
- d. the eligibility criteria and serviceability requirements are aligned with key product attributes including the minimum credit limit.

8. Distribution conditions

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

- online through the Kogan Money online channels and mobile app and via third party aggregators and partners, including unassisted online applications; and
- assisted applications through authorised 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 issued to individuals who meet the Product eligibility criteria and serviceability requirements;
- individuals prior to completing an application have access to appropriate information on the Kogan Money website or mobile app designed to assist individuals to understand if the Product attributes are likely to meet their objectives;
- 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; and
- d. authorised call centre staff may only distribute the Product if they are authorised to do so and then only in the manner permitted.

9. Why do 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;
- available information is more likely to assist individuals to assess if the key attributes of the Product are consistent with their objectives;
- an individual who meets the eligibility criteria and serviceability requirements for the Product is less likely to carry a substantial balance on their credit card over a prolonged period and is more likely to be able to afford the other fees and interest rates associated with the Product;
- 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 and serviceability requirements for the Product; and
- e. authorised call centre staff are trained to understand the Product and the relevant NAB policies.

10. Events and circumstances (review triggers) that would reasonably suggest the TMD is no longer appropriate

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 it may relate to the appropriateness of the TMD having regard to NAB's internal policies.

A notice of a review will be published on the Kogan Money Credit Cards website.

Material complaints

NAB actively monitors material complaints and will review the TMD where complaints in number or significance relate to:

- the understanding of the risks, key terms, conditions or key attributes of this Product;
- an individual's ability to earn and redeem Rewards Points; and
- the distribution or distribution practices of this Product.

Product performance

NAB actively monitors product performance indicators relevant to the Product and will review the appropriateness of the target market in circumstances where evidence shows that the financial situation of individuals in the target market may not be met, including the monitoring of:

- individuals experiencing disproportionate rate of delinquencies;
- early credit card account closures; or
- individuals carrying a substantial balance over an extended period.

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	Substantial product change	 Where a substantial change to the product terms, conditions or key product attributes, are made including: adding to, removing or changing a key 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. 	
	Feedback from distributors	Reporting received from distributors, or consistent feedback from distributors which suggests that the target market or key product attributes may no longer be appropriate.	
	Significant change to the external environment	 Changes to the regulatory or legislative environment for this Product. Changes to the 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	Evidence that the distribution of the Product or distributor conduct are significantly different to the expectations set out in the TMD.	
11. Review period	Next review date: 4 October 2025 Periodic reviews: within one year from the most recent periodic review		
12. 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. 		

13. Information
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.

