
TARGET MARKET DETERMINATION

PRODUCT 1: SMALL AMOUNT CREDIT CONTRACT (SACC)

Issuer	CASH COW LOANS PTY LTD T/A CASH COW LOANS (“CASH COW LOANS”)
Issuer ABN	88 657 467 911
Issuer ACL	572750
Product 1	Small Amount Credit Contract (SACC) (“the Product”)
Date initial TMD approved	21 July 2022
TMD Version	Version 3, updated 15 March 2026
TMD Status	Current

Purpose of this Document

The purpose of this Target Market Determination (**“TMD”**) is to comply with the Design and Distribution Obligations incorporated under Chapter 7 of the *Corporations Act 2001* (**“the Act”**) by the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019*.

The TMD aims to provide consumers and distributors with information about the class of consumers that comprises the target market for the Product, taking into account their objectives, financial situation and needs. It also specifies any product distribution conditions and restrictions and deals with reviews of the TMD as well as distributor arrangements.

Legal Disclaimer

This document is not a credit disclosure document and does not include all relevant terms and conditions associated with this product. It does not take into account any person’s individual objectives, financial situation or needs. Individuals interested in making use of this product should carefully read CASH COW LOANS’s Credit Guide and any other disclosure documents before making a decision whether to use this product.

Description of Target Market

This section is required under section 994B(5)(b) of the Act.

Target Market Summary

This Product is likely to be appropriate for a consumer who is seeking, and qualifying for, fast, unsecured short-term finance from \$500- \$2,000 to be used for an emergency, to meet an unexpected expense or to make a discretionary purchase, to be repaid over 12-52 weeks.

The target market has been established by assessing the Product (including its key attributes) and the consumer objectives, financial situation and needs for which the Product is likely to be appropriate. The class of consumers who fall within the target market for the Product is described below, based on the objectives, financial situation and needs of the consumer and the key attributes of the Product.

Description of Consumer Objectives, Financial situation and Needs

This Product is suitable for persons who:

- wish to borrow from \$500- \$2,000 for a personal purpose without providing security.
- earn income as an employee, or are self-employed and earn regular income and meet the 10% protected earnings requirement.
- if the consumer receives $\geq 50\%$ of income from Centrelink, total SACC repayments must not exceed 20% of their gross income.
- receive a minimum gross income of \$400.00 per week.
- wish to borrow funds short term from 12 to 52 weeks.
- have the financial capacity to pay the fees and principal repayments as they fall due.
- hold an Australian bank account.
- are an Australian Citizen, permanent Australian resident or qualifying visa holder.

Excluded Classes of Consumers

This product is unsuitable for persons:

- who do not qualify under the responsible lending requirements imposed by the *National Consumer Credit Protection Act 2009* ("National Credit Act"), will be unable to comply with their financial obligations under the Product terms, or could only comply with substantial hardship.
- for whom the Product will not meet their requirements or needs.
- who require funds to pay basic living expenses or other forms of credit.
- who gamble excessively.
- who wish to borrow funds for fewer than 12 or more than 52 weeks.
- who wish to borrow more than \$2,000 or less than \$500.
- who do not have the financial capacity to pay the fees and principal repayments as they fall due
- who are not Centrelink recipients, and whose repayments under the Product and any other SACC product would represent more than 10% of their net income.
- if the consumer receives $\geq 50\%$ of income from Centrelink, their total SACC repayments exceed 20% of their gross income.
- who do not hold an Australian bank account.
- who are not an Australian Citizen, permanent Australian resident or qualifying visa holder.

Description of Product and Key Attributes

The key attributes of this product are:

- unsecured short-term personal loans from \$500- \$2,000;
- a loan period of 12-52 weeks;
- suitable for qualifying consumers who have the financial capacity to pay the fees and principal repayments as they fall due.
- the ability to make additional and early payments on the loan with no early repayment fees or early

- termination fees.
- fees and costs are payable in respect of the Product and include an upfront establishment fee of 20% of the loan amount, a monthly maintenance fee of 4% of the loan amount and a dishonour fee of \$35 for a missed payment.

Product and Target Market Consistency

The Product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market based on the following:

The assessment that the Product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market is based on an analysis of the attributes and characteristics of the Product and establishing that they are consistent with the likely requirements of consumers in the target market.

Distribution Conditions and Restrictions

This section is required under s994B(5)(c).

Distribution Methods

This product is distributed through the following channels:

- Online through CASH COW LOANS website at <https://cashcowloans.com.au/>;
- Through approved referral partners; and
- By persons telephonically contacting the CASH COW LOANS office.

CASH COW LOANS does not make use of external credit representatives or distributors.

Distribution Conditions

This product is distributed subject to the following conditions and requirements:

- Providing specific content about the Product on CASH COW LOANS website, including lending guidelines, targeting individuals that have the appropriate borrowing capacity.
- Providing specific information about the key product attributes and eligibility requirements through online and telephonic communication.
- Providing specific information about the key product attributes and eligibility requirements through telephonic enquiries made to the CASH COW LOANS office.
- Providing specific information about the key product attributes and eligibility requirements through approved referral partners.

Factors Considered

In assessing the appropriateness of the distribution methods, conditions and restrictions, CASH COW LOANS has taken into account the following factors:

- The comparatively wide target market for the Product.
- CASH COW LOANS's ability to restrict distribution by providing sufficient lending guidelines

- and eligibility requirements.
- CASH COW LOANS's ability to manage the distribution channels.
- CASH COW LOANS's lack of external distributors.
- The capability of existing distribution methods to reach the intended target markets, based on past outcomes.
- The integrity of existing and prospective distribution methods.

Reviewing the TMD

CASH COW LOANS will review this TMD as follows:

Review Triggers

This part is required under section 994B(5)(d) of the Act.

If events or circumstances occur that would reasonably suggest that the TMD is no longer appropriate CASH COW LOANS will review the TMD. This may include:

- an event or circumstance that would materially change a factor taken into account in making the target market determination for the Product, e.g. an external event such as a change in regulation or a substantial change in government benefits schemes rules resulting in reduced consumer income.
- a material change to the design or distribution of the Product.
- a significant dealing in the Product that is not consistent with a product's TMD.
- the nature and extent of any feedback received from distributors or users of the Product, e.g. significant changes in customer complaints or loan default rates.
- experiencing significant regulatory issues with industry bodies or government entities.

Mandatory Review Periods

This part is required under section 994B(5)(e) and (f) of the Act.

Initial Review: This TMD will be reviewed within 1 year of the TMD approved date.

Periodic Reviews: This TMD will be reviewed at least every 1 year from the initial review date.

Distributors: Reporting & Required Information

This part is required under s994B(5)(g) & (h).

CASH COW LOANS does not make use of external distributors.

Complaints

Distributors (where applicable) are required to report and detail in writing all complaints in relation to the Product covered by this TMD to CASH COW LOANS every 6 months.

Significant Dealings

Distributors (where applicable) are required to report any significant dealing in the Product that is not consistent with this TMD, within 10 business days.

Appropriateness of the TMD

This section is required under s994B(5)(c) and s994B(8)(a) &(b).

CASH COW LOANS has reviewed the Product and its key attributes by considering its purpose, past outcomes and likely future outcomes, and has reasonably concluded that the Product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described above, when offered to the consumer in accordance with the distribution conditions listed above. The comparatively wide target market and limited distribution channels of CASH COW LOANS have been factors in assessing why the distribution conditions and restrictions will make it likely that consumers who purchase the Product are in the class of consumers for which it has been designed.

TARGET MARKET DETERMINATION

PRODUCT 2: MEDIUM AMOUNT CREDIT CONTRACT (MACC)

Issuer	CASH COW LOANS PTY LTD T/A CASH COW LOANS (“CASH COW LOANS”)
Issuer ABN	88 657 467 911
Issuer ACL	572750
Product 2	Medium Amount Credit Contract (MACC) (“the Product”)
Date initial TMD approved	21 July 2022
TMD Version	Version 3, updated 15 March 2026
TMD Status	Current

Purpose of this Document

The purpose of this Target Market Determination (“TMD”) is to comply with the Design and Distribution Obligations incorporated under Chapter 7 of the *Corporations Act 2001* (“the Act”) by the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019*.

The TMD aims to provide consumers and distributors with information about the class of consumers that comprises the target market for the Product, taking into account its objectives, financial situation and needs. It also specifies any product distribution conditions and restrictions and deals with reviews of the TMD as well as distributor arrangements.

Legal Disclaimer

This document is not a credit disclosure document and does not include all relevant terms and conditions associated with this product. It does not take into account any person’s individual objectives, financial situation or needs. Individuals interested in making use of this product should carefully read CASH COW LOANS’s Credit Guide and any other disclosure documents before making a decision whether to use this product.

Description of Target Market

This section is required under section 994B(5)(b) of the Act.

Target Market Summary

This product is likely to be appropriate for a consumer who is seeking, and qualifying for, fast, unsecured short-term finance from \$2,001 - \$5,000 to be used for an emergency, to meet an unexpected expense or to make a discretionary purchase, to be repaid over 26 - 78 weeks.

The target market has been established by assessing the Product (including its key attributes) and the consumer objectives, financial situation and needs for which the Product is likely to be appropriate. The class of consumers who fall within the target market for the Product is described below, based on the objectives, financial situation and needs of the consumer and the key attributes of the Product.

Description of Consumer Objectives, Financial situation and Needs

This product is suitable for persons who:

- wish to borrow \$2,001 - \$5,000 for a personal purpose without providing security.
- earn income as an employee, or are self-employed and earn regular income or receive regular Government Benefit payments and meet the CASH COW LOANS lending requirements.
- receive a minimum gross income of \$600.00 per week.
- wish to borrow funds short term between 26 – 78 weeks.
- have the financial capacity to pay the fees and principal repayments as they fall due.
- hold an Australian bank account.
- are an Australian Citizen, permanent Australian resident or qualifying visa holder.

Excluded Classes of Consumers

This product is unsuitable for persons:

- Who do not qualify under the responsible lending requirements imposed by the *National Consumer Credit Protection Act 2009* (“National Credit Act”), will be unable to comply with its financial obligations under the Product terms, or could only comply with substantial hardship.
- Who do not earn income as an employee, or are self-employed and earn regular income or receive regular Government Benefit payments and do not meet the CASH COW LOANS lending requirements.
- for whom the Product will not meet their requirements or needs.
- who require funds to pay basic living expenses or other forms of credit.
- who gamble excessively.
- who wish to borrow funds for fewer than 26 or more than 78 weeks.
- who wish to borrow more than \$5,000 or less than \$2,001.
- who do not have the financial capacity to pay the fees and principal repayments as they fall due.
- who do not hold an Australian bank account.
- who are not an Australian Citizen, permanent Australian resident or qualifying visa holder.

Description of Product and Key Attributes

The key attributes of this product are:

- unsecured short-term personal loans from \$2,001 - \$5,000.
- a loan period of 26 - 78 weeks.
- suitable for qualifying consumers who have the financial capacity to pay the fees and principal repayments as they fall due.
- the ability to make additional and early payments on the loan with no early repayment fees or early termination fees.
- fees, costs and interest are payable in respect of the Product and include an upfront establishment fee

of \$400, interest at a rate of 48% per annum on the loan amount and a dishonour fee of \$10 for a missed payment.

Product and Target Market Consistency

The Product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market based on the following:

The assessment that the Product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market is based on an analysis of the attributes and characteristics of the Product and establishing that they are consistent with the likely requirements of consumers in the target market.

Distribution Conditions and Restrictions

This section is required under s994B(5)(c).

Distribution Methods

This product is distributed through the following channels:

- Online through CASH COW LOANS website at <https://cashcowloans.com.au/>;
- Through approved referral partners; and
- By persons telephonically contacting the CASH COW LOANS office.

CASH COW LOANS does not make use of external credit representatives or distributors.

Distribution Conditions

This product is distributed subject to the following conditions and requirements:

- Providing specific content about the Product on CASH COW LOANS's website, including lending guidelines, targeting individuals that have the appropriate borrowing capacity.
- Providing specific information about the key product attributes and eligibility requirements through online and telephonic communication.
- Providing specific information about the key product attributes and eligibility requirements through telephonic enquiries made to the CASH COW LOANS office.
- Providing specific information about the key product attributes and eligibility requirements through approved referral partners.

Factors Considered

In assessing the appropriateness of the distribution methods, conditions and restrictions, CASH COW LOANS has taken into account the following factors:

- The comparatively wide target market for the Product.
- CASH COW LOANS's ability to restrict distribution by providing sufficient lending guidelines and eligibility requirements.
- CASH COW LOANS's ability to manage the distribution channels.
- CASH COW LOANS's lack of external distributors.
- The capability of existing distribution methods to reach the intended target markets, based on

- past outcomes.
- The integrity of existing and prospective distribution methods.

Reviewing the TMD

CASH COW LOANS will review this TMD as follows:

Review Triggers

This part is required under section 994B(5)(d) of the Act.

If events or circumstances occur that would reasonably suggest that the TMD is no longer appropriate CASH COW LOANS will review the TMD. This may include:

- an event or circumstance that would materially change a factor taken into account in making the target market determination for the Product, e.g. an external event such as a change in regulation or a substantial change in government benefits schemes rules resulting in reduced consumer income.
- a material change to the design or distribution of the Product.
- a significant dealing in the Product that is not consistent with a product's TMD.
- the nature and extent of any feedback received from distributors or users of the Product, e.g. significant changes in customer complaints or loan default rates.
- experiencing significant regulatory issues with industry bodies or government entities.

Mandatory Review Periods

This part is required under section 994B(5)(e) and (f) of the Act.

Initial Review: This TMD will be reviewed within 1 year of the TMD approved date.

Periodic Reviews: This TMD will be reviewed at least every 1 year from the initial review date.

Distributors: Reporting & Required Information

This part is required under s994B(5)(g) & (h).

CASH COW LOANS does not make use of external distributors.

Complaints

Distributors (where applicable) are required to report and detail in writing all complaints in relation to the Product covered by this TMD to CASH COW LOANS every 6 months.

Significant Dealings

Distributors (where applicable) are required to report any significant dealing in the Product that is not consistent with this TMD, within 10 business days.

Appropriateness of the TMD

This section is required under s994B(5)(c) and s994B(8)(a) & (b).

CASH COW LOANS has reviewed the Product and its key attributes by considering its purpose, past outcomes and likely future outcomes, and has reasonably concluded that the Product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described above, when offered to the consumer in accordance with the distribution conditions listed above. The comparatively wide target market and limited distribution channels of CASH COW LOANS have been factors in assessing why the distribution conditions and restrictions will make it likely that consumers who purchase the Product are in the class of consumers for which it has been designed.

TARGET MARKET DETERMINATION

PRODUCT 3: UNSECURED PERSONAL LOANS (\$5,001-\$10,000)

Issuer	CASH COW LOANS PTY LTD T/A CASH COW LOANS (“ CASH COW LOANS ”)
Issuer ABN	88 657 467 911
Issuer ACL	572750
Product 3	Unsecured Personal Loans from \$5,001-\$10,000 (“ the Product ”)
Date initial TMD approved	21 July 2022
TMD Version	Version 3, updated 15 March 2026
TMD Status	Current

Purpose of this Document

The purpose of this Target Market Determination (“**TMD**”) is to comply with the Design and Distribution Obligations incorporated under Chapter 7 of the *Corporations Act 2001* (“**the Act**”) by the *Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019*.

The TMD aims to provide consumers and distributors with information about the class of consumers that comprises the target market for the Product, taking into account its objectives, financial situation and needs. It also specifies any product distribution conditions and restrictions and deals with reviews of the TMD as well as distributor arrangements.

Legal Disclaimer

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Description of Target Market

This section is required under section 994B(5)(b) of the Act.

Target Market Summary

This product is likely to be appropriate for a consumer who is seeking, and qualifying for, fast, unsecured short-term finance from \$5,001 - \$10,000 to be used for an emergency, to meet an unexpected expense or to make a discretionary purchase, to be repaid over 52 - 156 weeks.

The target market has been established by assessing the Product (including its key attributes) and the consumer objectives, financial situation and needs for which the Product is likely to be appropriate. The class of consumers who fall within the target market for the Product is described below, based on the objectives, financial situation and needs of the consumer and the key attributes of the Product.

Description of Consumer Objectives, Financial situation and Needs

This product is suitable for persons who:

- wish to borrow \$5,001 - \$10,000 for a personal purpose without providing security.
- earn income as an employee, or are self-employed and earn regular income or receive regular Government Benefit payments and meet the CASH COW LOANS lending requirements.
- receive a minimum gross income of \$3,000 per month.
- wish to borrow funds short term from 52 – 156 weeks.
- have the financial capacity to pay the fees and principal repayments as they fall due.
- hold an Australian bank account.
- are an Australian Citizen, permanent Australian resident or qualifying visa holder.

Excluded Classes of Consumers

This product is unsuitable for persons:

- Who do not qualify under the responsible lending requirements imposed by the *National Consumer Credit Protection Act 2009* (“National Credit Act”), will be unable to comply with its financial obligations under the Product terms, or could only comply with substantial hardship.
- for whom the Product will not meet their requirements or needs.
- Who do not earn income as an employee, or are self-employed and earn regular income or receive regular Government Benefit payments and do not meet the CASH COW LOANS lending requirements.
- who require funds to pay basic living expenses or other forms of credit.
- who gamble excessively.
- who wish to borrow funds for fewer than 52 or more than 156 weeks.
- who wish to borrow more than \$10,000 or less than \$5,001.
- who do not have the financial capacity to pay the fees and principal repayments as they fall due.
- who do not hold an Australian bank account.
- who are not an Australian Citizen, permanent Australian resident or qualifying visa holder.

Description of Product and Key Attributes

The key attributes of this product are:

- unsecured short-term personal loans from \$5,001 - \$10,000.
- a loan period of 52-156 weeks.
- suitable for qualifying consumers who have the financial capacity to pay the fees and principal repayments as they fall due.
- the ability to make additional and early payments on the loan with no early repayment fees or early termination fees.
- fees and interest are payable in respect of the Product and include interest at a rate of 48% per annum on the loan amount and a dishonour fee of \$10 for a missed payment.

Product and Target Market Consistency

The Product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market based on the following:

The assessment that the Product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market is based on an analysis of the attributes and characteristics of the Product and establishing that they are consistent with the likely requirements of consumers in the target market.

Distribution Conditions and Restrictions

This section is required under s994B(5)(c).

Distribution Methods

This product is distributed through the following channels:

- Online through CASH COW LOANS website at <https://eftcapital.com.au/>;
- Through approved referral partners; and
- By persons telephonically contacting the CASH COW LOANS office.

CASH COW LOANS does not make use of external credit representatives or distributors.

Distribution Conditions

This product is distributed subject to the following conditions and requirements:

- Providing specific content about the Product on CASH COW LOANS's website, including lending guidelines, targeting individuals that have the appropriate borrowing capacity.
- Providing specific information about the key product attributes and eligibility requirements through online and telephonic communication.
- Providing specific information about the key product attributes and eligibility requirements through telephonic enquiries made to the CASH COW LOANS office.
- Providing specific information about the key product attributes and eligibility requirements through approved referral partners.

Factors Considered

In assessing the appropriateness of the distribution methods, conditions and restrictions, CASH COW LOANS has taken into account the following factors:

- The comparatively wide target market for the Product.
- CASH COW LOANS's ability to restrict distribution by providing sufficient lending guidelines and eligibility requirements.
- CASH COW LOANS's ability to manage the distribution channels.
- CASH COW LOANS's lack of external distributors.
- The capability of existing distribution methods to reach the intended target markets, based on past outcomes.
- The integrity of existing and prospective distribution methods.

Reviewing the TMD

CASH COW LOANS will review this TMD as follows:

Review Triggers

This part is required under section 994B(5)(d) of the Act.

If events or circumstances occur that would reasonably suggest that the TMD is no longer appropriate CASH COW LOANS will review the TMD. This may include:

- an event or circumstance that would materially change a factor taken into account in making the target market determination for the Product, e.g. an external event such as a change in regulation or a substantial change in government benefits schemes resulting in reduced consumer income.
- a material change to the design or distribution of the Product.
- a significant dealing in the Product that is not consistent with a product's TMD.
- the nature and extent of any feedback received from distributors or users of the Product, e.g. significant changes in customer complaints or loan default rates.
- experiencing significant regulatory issues with industry bodies or government entities.

Mandatory Review Periods

This part is required under section 994B(5)(e) and (f) of the Act.

Initial Review: This TMD will be reviewed within 1 year of the TMD approved date.

Periodic Reviews: This TMD will be reviewed at least every 1 year from the initial review date.

Distributors: Reporting & Required Information

This part is required under s994B(5)(g) & (h).

CASH COW LOANS does not make use of external distributors.

Complaints

Distributors (where applicable) are required to report and detail in writing all complaints in relation to the Product covered by this TMD to CASH COW LOANS every 6 months.

Significant Dealings

Distributors (where applicable) are required to report any significant dealing in the Product that is not consistent with this TMD, within 10 business days.

Appropriateness of the TMD

This section is required under s994B(5)(c) and s994B(8)(a) & (b).

CASH COW LOANS has reviewed the Product and its key attributes by considering its purpose, past outcomes and likely future outcomes, and has reasonably concluded that the Product is likely to be

consistent with the likely objectives, financial situation and needs of consumers in the target market as described above, when offered to the consumer in accordance with the distribution conditions listed above. The comparatively wide target market and limited distribution channels of CASH COW LOANS have been factors in assessing why the distribution conditions and restrictions will make it likely that consumers who purchase the Product are in the class of consumers for which it has been designed.