

VetPay

keeping veterinary care ***affordable***

Target Market Determination

Issued by: Vetpay Pty Ltd Australian Credit Licence Number 391975.

We are required by law to publish a target market determination (**TMD**) for the financial product we issue.

This TMD describes:

- the consumers for whom we have designed our product and that we have determined it is likely to be suitable for (that is the target market),
- the distribution conditions we apply that make it likely that consumers who acquire the product will be in the target market, and
- information about how we review the target market and distribution conditions so they remain appropriate.

We apply a customer-centric approach to ensure the suitability of our product based on the needs, motives for borrowing, objectives and financial situation of our customers.

This TMD does not constitute and should not be taken to be financial advice.

Effective date: 22 October 2024

Vetpay Target Market

Key Vetpay product attributes

VetPay is a payment plan product that can be used by consumers to purchase veterinary treatment or associated goods and services from a vet. Vetpay has the following features:

- continuing credit contract
- credit limit between \$500 and \$15,000
- repayment terms up to 5 years
- direct debit repayments

Eligibility requirements

Vetpay is designed for a class of consumers who meet the following **Eligibility Requirements**:

- are 18 years of age or older
- meet Vetpay's credit assessment criteria
- currently own a pet
- are permanently resident in Australia
- can provide a current Driver's License, Medicare card, Passport or similar
- can demonstrate they are of good character and a responsible pet owner

Objectives, financial situation, and needs

Vetpay is designed for consumers who own a pet and require a credit product to assist them to meet veterinary expenses and who meet Vetpay's credit assessment criteria and have the financial capacity to make repayments over time.

Vetpay is not designed for consumers (**Excluded Consumers**) who:

- do not satisfy each Eligibility Requirement
- may find it difficult to make periodic repayments
- are an unregistered or back yard breeder or operator of a puppy farm
- are seeking to obtain cash or to pay someone other than a vet or veterinary practice

These Excluded Consumers are not included in the target market.

Consistency between target market and the product

We have assessed that Vetpay is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market because the product's key attributes enable consumers in the target market to satisfy their needs and realise their objectives at a cost that is both reasonable and affordable.

Distribution

Distribution channels

Vetpay is distributed directly by us to consumers through online application via the Vetpay website.

Distribution conditions

All applications are made using Vetpay's application system, which requires information to establish whether or not the consumer meets the Eligibility Requirements (including credit assessment criteria) and fall within the target market.

The use of Vetpay's application system ensures that consumers have access to information about the Vetpay product before and during the application process to assist them to understand the product attributes and consider if it meets their objectives and needs.

Vetpay must not be distributed to consumers who do not meet the Eligibility Requirements outlined in this TMD. Vetpay's application systems are configured to reject applications made by consumers that do not meet the Eligibility Requirements.

Assessment of appropriateness

Vetpay has assessed that the distribution channels and conditions described above are appropriate to direct the distribution of Vetpay to its target market because:

- the product is relatively simple to understand;
- Vetpay's partner veterinarians have been trained by Vetpay to ensure they understand their obligations in relation to the target market, and are required to make enquiries of the customer as to the Eligibility Requirements (other than our credit assessment criteria) before an application is completed; and
- applications for Vetpay can only be approved by Vetpay, and our approval system has controls in place so that applicants who do not satisfy the Eligibility Requirements will not be able to open a Vetpay account.

Reviewing this target market determination

We will review this target market determination in accordance with the below:

Initial review: Within 12 months of the effective date.

Periodic reviews: At least every three years from the initial review.

Review triggers or events: Any event or circumstances that arise which suggest the TMD is no longer appropriate.

Review triggers include:

- material changes to the design or distribution of the product which may indicate that the TMD may no longer be appropriate;
- the occurrence of a significant dealing outside the target market;
- adverse media coverage or regulatory investigation or enforcement activity;
- there are repetitive or systemic complaints of the same type about Vetpay or a feature of the product;
- a number of consumers exceeding Vetpay's threshold experienced financial hardship, fall into arrears or are late making payments.

Where a review trigger has occurred, this Target Market Determination will be reviewed within 10 business days.

Reporting and monitoring this target market determination

Vetpay's partner vets must provide the following information to Vetpay:

Type of information	Description	Reporting Period
Specific complaints	Subject to availability, details of the complaint, including name and contact details of complainant.	As soon as practicable and within 5 business days of receipt of complaint.
Significant dealing(s): where the retail partner identifies a significant dealing that is not consistent with the TMD.	Date or date range of the significant dealing(s) and description of the significant dealing (eg why it is not consistent with the TMD).	As soon as practicable and in any case within 10 business days after becoming aware.