Target Market Determination

1. Target Market Determination - Indue Prepaid Royalty Shoppa Card

The Indue Prepaid Royalty Shoppa Card (Prepaid Card) is a financial product for the purposes of the design and distribution obligations set out in Part 7.8A of the *Corporations Act 2001* Cth).

The purpose of this Target Market Determination is to provide consumers information about the Prepaid Cards' key attributes, the target market for the Prepaid Card, and the distribution and monitoring arrangements between the issuer, Indue Ltd ACN 087 822 464 and the distributor, Anindilyakwa Land Council.

This document is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. You should refer to the Product Disclosure Statement for the Prepaid Card available at https://anindilyakwa.com.au/royalty-development/royalty-shoppa/ when making a decision about this product.

Date from which this Target Market Determination is effective

5 October 2021

2. Target Market

The information below summarises the overall class of consumers that fall within the target market for the Prepaid Card, based on the product key attributes and the objectives, financial situation and needs that it has been designed to meet.

(a) Class of consumers that fall within the target market

The Prepaid Card is for the Traditional Owners of the Groote Eylandt Archipelago, who are looking for a way of accessing their Royalty Distributions for essential household items and every day expenditure, with the flexibility of available retailers within the Groote Eylandt Archipelago and limited land-based retailers in the Northern Territory and Queensland.

(b) Description of the Prepaid Card and its key attributes

The Prepaid Card is a reloadable eftpos card.

The key attributes of the Prepaid Card are that:

- The cards cannot be used to purchase tobacco/cigarettes, game consoles/games, mobile phones or phone credit, fuel cards, motorbikes, airfares from Groote Archipelago;
- No cash can be withdrawn from stores/ATM's
- Retailers are accepted after considering the goods and services they provide (essential items).

(c) Excluded class of consumers

The Prepaid Card has not been designed:

 For any person who is not a registered Traditional Owner with the Anindilyakwa Land Council, Groote Eylandt.

(d) Consistency between target market and Likely objectives, financial situation and needs

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The Prepaid Card is is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as:

• It has been designed specifically for registered Traditional Owners with the Anindilyakwa Land Council to access their Royalty Distribution prior to the cash payment date. It has controls to ensure that it can only be used at approved retailers within the community, who supply essential items.

Distribution Conditions and Restrictions

(a) Distribution channels

The Prepaid Card is designed to be distributed to consumers through the following means:

 The Community Support Program (CSP) Office and the Finance Office of the Anindilyakwa Land Council

(b) Distribution conditions and restrictions

The Prepaid Card should only be distributed under the following circumstances:

• The applicant is a registered Traditional Owner with the Anindilyakwa Land Council

(c) Adequacy of distribution conditions and restrictions

Given the relatively wide target market and the need for the consumer:

 The product is only offered to registered Traditional Owners with the Anindilyakwa Land Council, who will have access to their Royalty Distribution prior to the cash payment date. These payments are made twice a year in December and June, with half of the distribution being loaded onto the prepaid cards approximately 10 weeks prior to the cash payment date. This ensures they are able to access essential items straight away when the cards are loaded.

3. Reviewing this Target Market Determination

We will review this Target Market Determination in accordance with the below:

Initial review	Within the first six months of the effective date.
Periodic reviews	At least every year from the initial review.
Review triggers or events	 Any event or circumstances arise that would suggest the Target Market Determination is no longer appropriate. This may include (but not limited): a material change to the design or distribution of the Prepaid Cards, including related documentation; occurrence of a significant dealing; distribution conditions found to be inadequate; change in legal or regulatory requirements; external events such as adverse media coverage or regulatory attention; and

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 significant changes in metrics, including, but not limited to any complaints in any 6 month period.

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

4. Reporting and monitoring this Target Market Determination

We will collect the following information from our distributors in relation to this Target Market Determination:

Complaints	Distributors will report all complaints in relation to the product(s) covered by this Target Market Determination on a three monthly basis. This will include written details of the complaints.
Significant dealings	Distributors will report if they become aware of a significant dealing in relation to this Target Market Determination within 10 business days.