

Target Market Determination - Bank of China UnionPay Rewards Credit Card

This is the target market determination (**TMD**) for the purposes of section 994B of the *Corporations Act 2001* (Cth) (**Corporations Act**) for each of the credit card products listed below (each a **Product**).

The issuer of the Product is Bank of China (Australia) Limited (**Bank**). This TMD sets out certain information relevant to the Bank's compliance with the design and distribution (**DDO**) framework in the Corporations Act, including the:

- class of consumers that makes up the target market for the Product;
- conditions that will be imposed on the distribution of the Product;
- requirements for the Bank to review the TMD; and
- requirements for distributors to report certain information to the Bank.

This TMD does not provide a complete list of the features and terms and conditions of the Product. This TMD should be read in conjunction with the *Bank of China Credit Card Conditions of use and Bank of China Credit Card Rewards Program Terms and Conditions* and other information available on the Bank's website in relation to the Product. If an application for a credit card is approved, the credit contract issued following any approval will govern the specific terms and conditions that apply to that particular Product.

This TMD has been prepared without taking into account any person's individual needs, objectives, or financial situation. Any person seeking to obtain a credit card Product should consider how it may affect their personal circumstances.

Capitalised terms have the meaning given to them in the *Bank of China Credit Card Conditions of use* and *Bank of China Credit Card Rewards Program Terms and Conditions*, unless otherwise defined.

Product	Bank of China UnionPay Rewards Credit Card		
Issuer	BANK OF CHINA (AUSTRALIA) LIMITED		
	ABN/ACN 28 110 077 622		
	Australian Financial Services Licence and Australian Credit Licence No 287322		
	(the Bank)		
Date of TMD	5 October 2021		
Target Market	Description of target market		
	The target market for this Product will comprise persons who wish to acquire goods or services from merchants and suppliers who accept payment using the payment scheme operated by UnionPay (including persons frequently transacting with or commuting to China) and at the time of acquiring those goods and services:		
	 want to manage their cashflow by accessing credit up to an agreed credit limit under a credit facility that allows them to make repayments and then redraw within the credit limit (sometimes referred to as a 'continuing credit contract'); 		

- want to temporarily defer repayment of the cost of acquiring the goods and services; and
- otherwise meet the Bank's eligibility criteria (including that they are able to repay the money that they borrow).

Description of product, including key attributes

Key attributes of this product include:

- the ability to make payment to merchants/suppliers both in Australia and overseas including in China who accept UnionPay as a payment method using the customer's credit card;
- the ability to make payments over the internet and by phone;
- the ability to link the credit card facility to the Bank's mobile banking facilities which allows easy account monitoring;
- where the Product is used to purchase goods or services, an interest free period of up to 50 days (but only if the outstanding balance is reduced to nil by the due date shown in each statement);
- an option to apply for a smart interest free instalment plan (subject to the consent of the Bank). The Bank can consider requests for a purchase instalment plan (which can be applied for after a purchase) or a statement instalment plan (which can be applied for after a statement has been issued and if approved may require a minimum balance payment of 10%).
- fees and charges payable in respect of the Product such as annual fee, late payment fees and currency conversion fees for foreign currency transactions;
- the use of the card is subject a fraud monitoring program that assists customers to mitigate against the risk of their credit card details being used fraudulently;
- the ability to obtain cash advances under the credit facility from ATMs anywhere in the world in the relevant local currency and from the Bank's Australian branches (subject to the cash advance rate);
- the ability to obtain balance transfers from another credit facility (subject to the cash advance rate and a balance transfer fee).;
- a minimum periodic repayment amount that is calculated as the greater of \$20 or 4% of the total outstanding amount (excluding overdue amounts), whichever is greater.

In addition, the Product has the following key attributes that vary according to the specific Product:

Product feature	UnionPay Rewards Credit Card
Additional Cardholder	Yes
Additional Cardholder fees apply	Yes

Rewards Points	Yes
Interest rate applicable for purchases of goods and services	Standard rate for purchases
Fees and charges applicable	Standard fees and charges including an annual fee
Minimum amount of credit	\$500
Maximum amount of credit	\$50,000

Information about Fees and Charges for this Product are set out in the Bank's 'Credit Card Rates and Fees' information which is available on the Bank's website (as is the Key Facts Sheet for the Bank's credit card products).

Description of likely objectives, financial situation and needs of consumers in the target market

This Product is designed for customers whose <u>likely needs</u> include:

- the ability make payments using the payment system operated by UnionPay; and
- the ability to manage or meet cash flow on an ongoing basis.

In addition, this Product is designed for customers whose likely objectives and financial situation include the following as relevant:

Card type	Likely objectives of customers in the target market	Likely financial situation of customers in the target market
UnionPay Rewards	Preference to earn rewards from use of their credit card and willingness to accept standard fees and interest rates for the opportunity to earn and redeem rewards.	Meet the Bank's credit assessment and eligibility requirements including: • having regular income; • having the ability to fully repay the credit balance on repayment dates so as not to carry significant balances after repayment dates for a prolonged period; and • having a good credit score.

Classes of consumers for whom the product is clearly unsuitable

This Product is not suitable for customers who do not require an ongoing credit facility to use to make recurring purchases.

This Product is not suitable for customers looking to obtain credit below the minimum credit limit or above the maximum credit limit for the relevant card type.

In addition, this Product will not be suitable for some types of customers as described below:

Card type	Persons for whom this product will not be suitable	
UnionPay Rewards	 Customers who: do not wish to have the ability to make payments to persons who accept UnionPay; and prefer to minimise costs over the chance to participate in rewards programmes; and are likely to carry substantial balances for prolonged periods (i.e. they will not be able to reduce the credit amount to nil on repayment dates). 	

Explanation of why the product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market

The Bank considers that this Product is likely to be consistent with the likely objectives, financial situation and needs of customers in the target market because:

- the Product provides access to a payment scheme accepted by merchants in Australia and internationally (but especially in China); and
- each credit card is linked to an underlying credit facility that allows the customer to manage cash flow needs within the agreed credit limit.

In addition, the Bank considers that this Product is likely to be consistent with the likely objectives, financial situation and needs of customers in the specific target market of that Product for the reasons set out in the table below:

Card type	Explanation of why the product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market	
UnionPay Rewards	This payment system operated is very widely accepted by merchants in China and is also accepted by many merchants in Australia.	

	This credit card allows customers to earn rewards points for purchases of goods and services. Where customers repay their credit balance to nil by each repayment date customers will not incur interest on purchases due to the 50 days of interest free period for purchases.			
Distribution	Distribution conditions			
Conditions	This Product can only be distributed by the Bank's own employees, in branch or over the telephone, who are authorised and trained to deal with customers in relation to credit card products. This Product is not distributed by third aggregators or brokers (except in the limited circumstances where it is distributed in conjunction with Bank of China Discount Plus Home Loan or a Bank of China Discount Plus Investment Home Loan).			
	All credit card applications are required to go through a common application and approval process which requires the customer to provide information about the requirements and objectives of the customer applying for a credit card product and their financial situation (consistent with the Bank's responsible lending obligations and credit approval criteria).			
	Why the distribution conditions and restrictions will make it more likely that the consumers who acquire the product are in the target market			
	The Bank considers that the distribution conditions mean that it is likely that customers who acquire the Product will be in the target market because:			
	 distribution of the Product is restricted to the Bank's own authorised employees; 			
	 employees must be authorised by the Bank to distribute this Product and are required to complete relevant training in relation to the Product and the distribution of the Product; and 			
	 the training provided to the Bank's employees, and the application and approval process, take into the likely objectives, financial situation and needs of customers. 			
Review Triggers	The review triggers that would reasonably suggest that the TMD is no longer appropriate in relation the Product include:			
	 there are significant changes to the key attributes of the Product as described in this document that make it reasonable to conclude that it would no longer be consistent with the TMD; 			
	the bank identifies a significant dealing that it is required to report to ASIC;			



	 there are significant changes to the methods of distribution of the Product that make it reasonable to conclude that the TMD does not reflect the actual distribution methods used by the Bank; 			
	a significant number of complaints is received from customers in relation to their purchase or use of the Product (or in relation to the rewards program) that reasonably suggests that the TMD for the Product is no longer appropriate;			
	there are unexpectedly high rates of default or unusually high numbers of hardship applications in relation to the Product (except where explainable by external factors unrelated to product attributes or distribution arrangements);			
	ASIC has utilised its product intervention power in Part 7.9A of the Corporations Act to intervene in relation to this product: and			
	UnionPay ceases to a method of payment that is widely accepted by merchants in China.			
Review Periods	First review date: Within 1 year from 5 October 2021. Periodic reviews: Within 2 years of the first review date and each subsequent review date after that.			
Distribution Information Reporting Requirements	The following information must be provided to Bank of China (Australia) Ltd by distributors who engage in retail product distribution conduct in relation to this product:			
	Type of information	Description	Reporting period	
	Complaints	Number of complaints, nature and substance of the complaint	Every 3 months within 10 business days from the end of the period.	
	Significant dealing(s) ¹	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, and in any case within 10 business days after becoming aware	

¹ For example, a distributor may consider a dealing outside the TMD to be significant because (i) they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the Product, or (ii) they constitute an individual transaction which has resulted in, or will or is likely to result in, significant detriment to the customer (or class of customers), or (iii) the issuer has reasonably identified the this type of dealing as significant or a regulator, court or AFCA identifies this type of dealing as significant.

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