TARGET MARKET DETERMINATION

Home Energy Saver Loan by Brighte

Offered by Brighte Capital Pty Limited (ABN 74 609 165 906)

1. About this document

This target market determination (TMD) seeks to offer consumers, distributors and staff with an understanding of the class of consumers for which this product has been designed, having regard to the objectives, financial situation and needs of the target market.

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. Consumers must refer to the Product Terms and Conditions and any supplementary documents which outline the relevant terms and conditions under the product when making a decision about this product.

Terms and Conditions to which this target market determination applies

This TMD applies to the Home Energy Saver loan by Brighte referred to in the following Terms and Conditions:

- https://brighte.com.au/support/home-energy-saver-loan-terms

Date from which this target market determination is effective

17 June 2026

2. Class of Consumers that fall within this Target Market

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

The Loan has been designed for consumers whose likely objectives, financial situation and needs (as listed below) are aligned with the product (including the key attributes). The Loan is for those who are seeking an unsecured no interest personal loan to pay for approved clean energy upgrades to their NSW property under the NSW Government Home Energy Saver program.

Product description and key attributes

The key eligibility requirements and product attributes of the Home Energy Saver loan by Brighte are as follows:

Eligibility Requirements

- Be an Australian citizen or permanent resident
- Be the homeowner or landlord of an eligible property (renters are not eligible)
- Be over the age of 18
- The installation property must be located in New South Wales
- The combined household taxable income of all persons listed on title must not exceed $210,000 per annum, verified via Notice of Assessment
- Employed, self-employed, retired or a pensioner
- Hold a government-issued ID (driving licence, passport or Medicare card)
- Hold an email address and Australian mobile number
- Ability to pay for the purchase over equal fortnightly repayments for the term offered

Key attributes

- No interest (0%)
- No establishment fee
- No annual, account keeping or service fees
- Late payment fee of $4.99 per missed repayment, capped at $49.90 per year
- Fixed fortnightly repayments; first repayment 28 days after loan settlement
- No additional fees for lump sum or early repayment
- An entirely digital pathway - the application process, receiving documents, contract acceptance, and viewing/updating account details can all be completed online
- Available for sole or joint applicants
- Loan term up to 10 years
- Financing available for amounts from $2,000 to $15,000 (maximum $15,000 per property across all Home Energy Saver loans)
- Available only for approved clean energy product categories approved NSW Government's Energy Security Corporation (ESC) for the program including:
    - Rooftop solar PV system
    - Battery energy storage system
    - EV Level 2 charger
    - Heat pump water heater or solar water heater

    - Reverse-cycle air conditioner
    - Ceiling insulation
    - Double-glazed windows or doors
    - Induction cooktop
    - Ceiling fans and draught proofing
    - Switchboard upgrade (where required to support another eligible upgrade)
    - NatHERS home energy assessment
- Funded by the NSW Government

Objectives and needs

The product has been designed for consumers who are looking to use a no interest unsecured personal loan to pay for approved clean energy upgrades to their NSW property under the NSW Government Home Energy Saver program. The product targets consumers with the following objectives and needs:

- To split the cost of approved clean energy upgrades over equal fortnightly repayments with no interest
- The certainty of no interest, no establishment fee, no annual or account keeping fees, and fixed fortnightly repayments over the term of the loan
- An option to make additional payments or repay early with no added fees
- Access to finance under the NSW Government Home Energy Saver program

Financial situation

This product has been designed for consumers who have the financial capacity to repay the principal amount borrowed in accordance with the repayment schedule.

Excluded class of consumers

This product has not been designed for individuals who:

- Who do not meet the eligibility criteria listed above (including residency, income, property type and ownership requirements)
- Who are renters or occupiers but do not have an ownership interest in the property
- Who want a line of credit facility or the ability to redraw funds
- For whom the product has been determined as unsuitable in accordance with the lender's credit risk tolerance or responsible lending obligations
- Who have not demonstrated the financial capacity to make the repayments
- Who want access to cash
- Who want to use the Loan for goods or services that are not approved under the NSW Home Energy Saver program
- Who want to use the The Loan for any purpose other than the purchase of eligible goods and/or services provided by Brighte-accredited vendors who are NetCC accredited (where applicable)
- Who want to select a repayment term of more than 10 years

- Whose property has already reached the $15,000 per-property loan cap under the program
- Whose property is social housing
- Whose property is used as short-term rental accommodation

Consistency between target market and the product

This product is likely to be consistent with the likely objectives, needs and financial situation of the class of consumers in the target market.

This is based on an analysis of the key attributes, features and terms of the product, including its design with the identified needs of the class of consumers in mind. Given the product has been designed for NSW homeowners and landlords who want a loan to pay for approved clean energy upgrades under the NSW Government Home Energy Saver program - with the certainty of no interest, no establishment or ongoing fees, fixed fortnightly repayments, and an ability to repay early with no penalty - the product design enables this form of repayment schedule and access.

Additionally, because the product has been designed for those who have demonstrated the financial capacity to meet the repayments over the term of the loan, the individual must be over the age of 18, be an NSW homeowner or eligible landlord, and have the financial capacity to make the repayments in accordance with the repayment schedule. The household income cap of $210,000 further ensures the product is targeted at the consumer segment the NSW Government program was designed to serve.

3. How this product is to be distributed

Distribution channels

This product is designed to be distributed through the following channels:

- Brighte-accredited, NETCC-certified (where applicable), NSW-based vendors or partners who have met the participant criteria set out in the NSW Home Energy Saver program requirements. Approved vendors can distribute the Brighte HESL via the following means:
    - Face to face contact
    - Over the phone
    - Via a website or other electronic means

Distribution conditions and restrictions

The distribution of this product is subject to the following conditions and restrictions:

- The consumer must meet the eligibility criteria described above
- The distributor is required to be an accredited Brighte vendor or partner (or an agent of a Brighte accredited vendor or partner) who: is NETCC-certified (where applicable); services only NSW; has completed Brighte's mandatory program training;

has signed the program-specific vendor contract; and continues to meet the NSW program requirements

- The distributor is only authorised to engage in conduct as a mere referrer (such as informing the consumer that Brighte can offer the Home Energy Saver loan and providing the consumer's contact details to Brighte)
- The distributor is not authorised to provide any credit assistance
- The distributor is only authorised to market or promote this product in accordance with approved marketing material provided by Brighte
- Unsolicited selling practices, including door-to-door sales and cold calling, are not permitted under the program

Adequacy of distribution conditions and restrictions

We have concluded that the distribution conditions and restrictions will make it likely that a consumer who acquires the product will be in the class of consumers for which it has been designed.

This is based on an assessment of the distribution conditions and the appropriateness of them to assist distribution being targeted towards the class of consumers within the target market. The eligibility criteria enable distributors to ask 'knock out' questions to determine if a consumer meets the eligibility requirements of the product.

Additionally, the requirement of authorised mere referrers to be NETCC-certified, Brighte-accredited and trained, to hold the NSW-specific vendor contract, to only use approved marketing or promotional materials, and to continue to meet the NSW program requirements is considered adequate in supporting the distribution of the product in accordance with the objectives, financial situation and needs of the class of consumers outlined above. The prohibition on unsolicited selling practices further reduces the risk of distribution to consumers outside the target market.

4. Reviewing this target market determination

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

Initial review	Within 1 year of the effective date.
Periodic reviews	At least every 12 months from the date of this TMD

Review triggers or events	Any event or circumstances arise that would suggest the TMD is no longer appropriate. This may include (but is not limited to):
	• A material change to the design or distribution of the product, including related documentation and key attributes
	• The occurrence of a significant dealing
	• Distribution conditions or restrictions being found to be inadequate, including, but not limited to, sales practices, ongoing monitoring, marketing or promotional channels, or training
	• Material changes to the NSW Government Home Energy Saver program requirements (including eligibility criteria, approved product categories, or vendor accreditation requirements)
	• External events such as material adverse media coverage or regulatory attention
	• a significant change in metrics exceeding the applicable threshold such as:
	    ○ number of consumers who are late making repayments or in financial hardship (measured overall);
	    ○ number of complaints as a proportion of the number of open accounts
	    ○ number of customers in external dispute resolution as a proportion of total internal complaints; or
	    ○ repetitive and/or systemic complaints of the same type
	    ○ about the product features or distribution

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

5. Reporting and monitoring this target market determination

We may collect the following information from our distributors in relation to this TMD

Specific complaints	Distributors will report specific complaints in relation to the product covered by this TMD as soon as practicable and within 5 business days of receipt of the complaint. This will include (if available) written details of the complaint, including the complainant's name and contact details. This will include (if available) written details of the complaint, including the complainant's name and contact details.
Complaints	Distributors will report the number of complaints, the channel through which they received the complaints, and general feedback relating to the product and/or performance of the product covered by this TMD on a 6 monthly basis.
Significant dealings	Distributors will report if they become aware of a significant dealing in relation to this TMD within 10 business days. This will include information about the date (or date range) of the significant dealing(s) and a description of the significant dealing (e.g. why it has been determined to not be consistent with the TMD).