22 Queen Street
PO Box 78 Grafton NSW 2460
P (02) 6642 0400
E grafton@westlawn.com.au
westlawn.com.au

5 December 2025

Target Market Determination

1. Introduction

This Target Market Determination (**TMD**) is made by Westlawn Finance Limited ABN 19 096 725 218 (the **Issuer** or **Company**) and is required under section 994B of the *Corporations Act 2001* (Cth) (the **Act**). This TMD describes the class of consumers that comprise the target market for the financial product and matters relevant to the product's distribution and review (specifically, distribution conditions, review triggers and periods, and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the product being consistent with the most recent TMD (unless the distribution is excluded conduct).

This document is **not** a prospectus or product disclosure statement and is **not** a complete summary of the product features or terms of the product. This document does **not** take into account any person's individual objectives, financial situation or needs. Persons interested in acquiring this product should carefully read the Prospectus for the product before making a decision whether to buy this product.

Capitalised terms have the meaning given to them in the Prospectus, unless otherwise defined in this TMD. The Prospectus can be obtained by contacting the Issuer on 1300 WESTLAWN or on our website at https://www.westlawn.com.au/investment/.

2. Target Market Summary

This product is intended for use as a minor allocation of a consumer's investable assets and is appropriate for a consumer seeking income distribution and has, at a minimum, a medium risk/return profile for that portion of their investment portfolio. The consumer may choose the investment timeframe for the product ranging from 31 days to 5 years with the product unlikely to be suitable for a consumer needing access to their capital prior to the end of their chosen investment timeframe.

3. Product and Issuer identifiers

Issuer/Company	Westlawn Finance Limited
Issuer ABN	19 096 725 218
TMD contact details	Contact name: Andrew Hayes Contact number: (02) 6642 0400 Email: grafton@westlawn.com.au
Product	The Issuer offers consumers (the **investors**) the opportunity to purchase Unsecured Notes in the Issuer (**Notes**). Each Note has a specific fixed interest rate which will apply for the term of the investment as selected by each investor (which will be between 31 days and 5 years). Funds raised by the issue of the Notes are used to fund the operations of the Issuer, in particular the funding of the Issuer's lending portfolio. The Notes are not secured over the Issuer's assets.
TMD issue date	5 December 2025
TMD Version	5.0
Distribution status of fund	Available
TMD Status	Current

4. Description of Target Market

TMD indicator key

The Consumer Attributes for which the product is likely to be appropriate are assessed using a red and green rating methodology;

In target market	Not considered in target market

Instructions

In the tables below, Column 1, Consumer Attributes, indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering this product. Column 2, TMD indicator, indicates whether a consumer meeting the attribute in column 1 is likely to be in the target market for this product.

Appropriateness

The Issuer has assessed the product and formed the view 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 as described below, as the features of this product in Column 3 of the table below are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (for example with an intended product use of *minor allocation*). In such circumstances, the product should be assessed against the consumer's attributes for the relevant portion of the portfolio, rather than the consumer's portfolio as a whole. For example, a consumer may seek to construct a balanced or moderate diversified portfolio with a minor allocation to growth assets. In this case, a product with a *High* risk/return profile may be consistent with the consumer's objectives for that *minor allocation* notwithstanding that the risk/return profile of the consumer as a whole is *Medium*. In making this assessment, distributors should consider all features of a product (including its key attributes).

Consumer attribute - investment objective	TMD Indicator	Product description including key attributes
Income distribution (The consumer seeks to invest in a product designed or expected to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (typically, high dividend-yielding equities, fixed income securities and money market instruments.)	**In target market**	The attributes of the target market are investors seeking to acquire an investment product to generate income. Investors can choose to have income paid to them monthly, quarterly or at maturity. Investors also have the option of reinvesting their quarterly interest payment in which case it is compounded quarterly until the Notes maturity. The Notes rank ahead of equity-holders but behind secured creditors of the Company. Paid-up capital or equity is the money invested by the owners of the Company (plus any retained profits). It provides a "buffer" to the Company in the event of financial difficulties. ASIC recommends that issuers should maintain an equity capital ratio (calculated as total equity/(total liabilities + total equity) of 8% where only a minor part (e.g. 10%) of its activity is property development or lending funds directly or indirectly for property development. The Company maintains an equity ratio well in excess of the ASIC minimum of 8% (as at 30 September 2025 the equity ratio is approximately 13%). Whilst the Company does not guarantee the repayment of money invested in Notes nor are any interest payments guaranteed, the Notes are expected to have a level of capital preservation as the Notes exhibit lower volatility than listed equities or listed REITs in a market downturn. The issue and redemption price for each Note is $1 and therefore the Notes do not generate capital return over the investment timeframe.
Capital preservation (The consumer seeks to invest in a product designed or expected to have low volatility and minimise capital loss. The consumer prefers exposure to defensive assets (such as cash or fixed income securities) that are generally lower in risk and less volatile than growth investment.)	**Not considered in target market**	
Capital guaranteed (The consumer seeks a guarantee or protection against capital loss whilst still seeking the potential for capital growth (typically gained through a derivative arrangement). The consumer would likely understand the complexities, conditions and risks that are associated with such products.)	**Not considered in target market**	
Capital growth (The consumer seeks to invest in a product designed or expected to generate capital return over the investment timeframe. The consumer prefers exposure to growth assets (such as shares or property) or otherwise seeks an investment return above the current inflation rate.)	**Not considered in target market**	

Consumer attribute - intended product use	TMD Indicator	Product description including key attributes
Satellite allocation – up to 10% of investible assets (The consumer may hold the investment as up to 10% of the total *investible assets*[1]. The consumer may seek a product with *very low portfolio diversification*[2]. Products classified as *extremely high* risk are likely to meet this category only).	**In target market**	The Company invests in a well-diversified portfolio of loans with no material exposure to any single borrower or industry. However, the product itself represents a single asset class in the form of an unsecured note. The Notes are designed for use as a minor allocation of an investor's broader portfolio of investments.
Minor allocation – up to 25% of investable assets (The consumer may hold the investment as up to 25% of their total *investable assets*[1]. The consumer is likely to seek a product with at least *low portfolio diversification*[3].)	**In target market**	
Core Component – up to 50% of investable assets (The consumer may hold the investment as up to 50% of their total *investable assets*[1]. The consumer is likely to seek a product with at least *medium portfolio diversification*[4].	**Not considered in target market**	
Major allocation – up to 75% of investable assets (The consumer may hold the investment as up to 75% of their total *investable assets*[1]. The consumer is likely to seek a product with at least *high portfolio diversification*[5].)	**Not considered in target market**	
Solution/Standalone – up to 100% of investable assets (The consumer may hold the investment as up to 100% of their total *investable assets*[1]. The consumer is likely to seek a product with at least *very high portfolio diversification*[6].)	**Not considered in target market**	

[1] ***Investable assets*** – means those assets the investor has available for investment, excluding the residential home.

[2] ***Very low portfolio diversification*** - means the product provides exposure to a single asset (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).

[3] ***Low portfolio diversification*** – means the product provides exposure to a small number of holdings (for example, fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, a single major commodity (eg. gold) or equities from a single emerging market economy).

[4] ***Medium portfolio diversification*** – means the product provides exposure to a moderate number of holdings (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).

[5] ***High portfolio diversification*** – means the product provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asst classes, sectors or geographic markets (for example, global equities).

[6] ***Very High portfolio diversification*** – means the product provides exposure to a large number of holdings across a broad range of asst classes, sectors and geographic markets with limited correlation to each other.

Consumer attribute - investment timeframe	TMD Indicator	Product description including key attributes
Minimum investment timeframe – 31 days to 5 years	**In target market**	Each investor chooses the minimum investment timeframe for its Notes which are available in a range of terms from 31 days to 5 years.

Consumer attribute - need to access capital	TMD Indicator	Product description including key attributes
At Note maturity	**In target market**	The Notes may be redeemed on each Notes applicable maturity date upon the prior written request of the Noteholder. The Noteholder must inform the Issuer prior to the maturity date that they wish to redeem the Notes as at the applicable maturity date. The Issuer contacts all Noteholders by phone, letter or email approximately 14 days prior to the Note maturity date, setting out options and seeking instructions. For further information on rollovers/reinvestments see section 5 below 'Rollover / reinvestment investors'. The Issuer may also, in its absolute discretion, allow early redemption of Notes (although an early redemption fee may apply).
At issuer discretion	**Not considered in target market**	

Consumer attribute - risk profile (ability to bear loss) and return profile	TMD Indicator	Product description including key attributes
Low (For the relevant part of the consumer's portfolio, the consumer: • has a conservative or low risk appetite, • seeks to minimise volatility and potential losses (e.g., has the ability to bear up to 1 negative return over a 20 year period (SRM 1 to 2)[1]), and • is comfortable with a low target return profile. Consumer typically prefers stable defensive assets such as cash.)	**Not considered in target market**	The attributes of the target market are investors that are able to bear the risks associated with an investment in the Notes; with such investor risk appetite different depending on the different Note investment terms invested in (from 31 days to 5 years). The Notes are subject to risks as summarised in the Prospectus. In particular, return of capital or payment of any interest on the Notes is not guaranteed. Refer to the Prospectus and other continuous disclosure notices for updated information on the Company's financial position and performance against ASIC's benchmarks.
Medium (For the relevant part of the consumer's portfolio, the consumer: • has a moderate or medium risk appetite, • seeks low volatility and potential losses (e.g., has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)[1]), and • is comfortable with a moderate target return profile. Consumer typically prefers defensive assets such as fixed income.)	**In target market**	
High (For the relevant part of the consumer's portfolio, the consumer: • has a high risk appetite, • can accept high volatility and potential losses (e.g., has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)[1]), and • seeks high returns (typically over a medium or long timeframe). Consumer typically prefers growth assets such as shares and property)	**In target market**	

Consumer attribute - risk profile (ability to bear loss) and return profile	TMD Indicator	Product description including key attributes
Very high (For the relevant part of the consumer's portfolio, the consumer: • has a very high risk appetite, • can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)[1], and • seeks to maximise returns (typically over a medium or long timeframe. Consumer typically prefers high growth assets such as high conviction portfolios, hedge funds and alternative assets.)	**In target market**	
Extremely high (For the relevant part of the consumer's portfolio, the consumer: • has an extremely high risk appetite, • can accept significant volatility and losses, and • seeks to obtain accelerated returns (potentially in a short timeframe). Consumer seeks extremely high risk, speculative or complex products which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes such as crypto-assets or collectibles)	**Not considered in target market**	

[1] The standard risk measure (**SRM**) is an investment risk classification system developed by the FSC and ASFA to enable investors to compare investment options across superannuation funds. The SRM contains seven risk levels ranging from 'very low' to 'very high', with each level based on the estimated number of negative annual returns over any 20-year period (for more information, see Standard risk measure: Guidance paper for trustees, issued by the FSC and ASFA in July 2011 (note the SRM guidance differs from the bands used in this TMD). SRM is not a complete assessment of risk and potential loss. For example, it does not detail important issues such as the potential size of a negative return (including under market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some products may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risk, which should be documented together with the SRM to substantial the product risk rating.

5. Distribution Conditions / Restrictions

The Company is both the issuer and the sole distributor of the product.

Note applicants

The Company distributes the Prospectus for its products electronically through its own website https://www.westlawn.com.au/investment/, or in hard copy in response to requests made directly to the Company. Upon receipt of a potential investor's application form, an experienced Company representative (**Representative**) will engage directly with each potential investor (in person or by phone) and ask each potential investor a series of questions (**Filtering Questions**) in order for the Issuer to understand, at a high level, whether the potential investor may be within the target market.

Rollover / reinvestment investors

The Issuer will contact all Noteholders by phone, letter or email approximately 14 days prior to the Note maturity date, setting out options and seeking instructions (**Maturity Date Contact**).

The Issuer has determined, for all maturing Notes where the investor has been asked the Filtering Questions within the previous 12 months, if it receives no response to the Maturity Date Contact from such a Noteholder, it will rely on existing investor information and the Issuer will reinvest the maturing funds in new Notes for the same term as the maturing investment at the prevailing interest rate. The Issuer considers it is reasonably likely the Noteholder is likely to be in the target market given the short time that has elapsed since the Issuer last gathered relevant investor information from that Noteholder.

For all maturing Notes where the Investor has not been asked the Filtering Questions within the previous 12 months, the Issuer has determined that in addition to the Maturity Date Contact a Representative will engage directly with the Noteholder (either in person or by phone) prior to the Notes maturity date and ask each such Noteholder the Filtering Questions in order for the Issuer to understand, at a high level, whether the Noteholder is considered to be in the target market if the Notes are invested for a further investment term. If the Representative is unable to contact a Noteholder in order to determine whether or not the Noteholder is considered to be in the target market for the product, the Company will not rollover/reinvest the Notes for a further investment term and will redeem the Notes on their maturity date (or as soon as practicable subject to confirmation of Noteholder banking details if the Noteholder is uncontactable).

General distribution conditions/restrictions

Only selected representatives of the Company that have undergone internal training in respect of the Notes and the Note's target market and who have demonstrated knowledge, competence and experience in respect of the Notes and the Notes target market are able to promote and distribute this product.

The Company does not provide financial advice. The Company ensures that its representatives provide consumers with factual information only and make no recommendation or suggestion that consumers invest in the Company's products or in any other investment, and that any investment should be made on the basis of the Prospectus and any independent financial advice the consumer may seek.

The Company does not employ any third party distribution channels.

It has been determined that the distribution conditions and restrictions will make it likely that consumers who purchase the Notes are in the class of consumers for whom it has been designed. We consider that the distribution conditions are appropriate and will assist distribution in being directed towards the target market for whom the product has been designed.

6. Review Triggers

The Company will monitor and review the outcomes produced by the design and distribution of its products and consider whether changes are required to the products, to the way they are distributed and to whom they are being sold (**Review**).

The Company will conduct a Review:

(a) prior to the issue of a prospectus;

(b) prior to the issue of a supplementary prospectus;

(c) upon determination of an ASIC reportable significant dealing (as described in paragraphs RG 274.158 – RG 264.161 of ASIC Regulatory Guide RG 274 *Product design and distribution obligations*);

(d) within 10 business days of becoming aware of any event that suggests this TMD is no longer appropriate;

(e) within 10 business days if:

  (i) there is a failure by the Company to comply with the terms on which its products were issued, the provisions of the Trust Deed between the Company and Melbourne Securities Corporation Limited (**Trust Deed**), or Chapter 2L of the Corporations Act 2001;

  (ii) an event occurs which causes or could cause the monies outstanding on the Company's products or any of them to become immediately payable or the terms or the terms of the product to become immediately enforceable, or any other right or remedy under the terms of the products or the Trust Deed to become immediately enforceable;

  (iii) a circumstance occurs that materially prejudices the Company or any of its subsidiaries or any security or charge included in or created by the products or the Trust Deed;

  (iv) there is a substantial change in the nature of the Company's business;

  (v) the Company sustains a material trading or capital loss;

  (vi) the Company elects to employ any third party distribution channel; or

  (vii) the Company receives a complaint that concerns the design or distribution of its products.

Upon becoming aware of a Review Trigger, or a potential Review Trigger, the Chief Executive Officer must within 5 business days provide to the Board all such information necessary for the Board to determine whether this TMD is no longer appropriate.

7. Periodic Review

In addition to any Review conducted as a result of the occurrence of a Review Trigger, the Company must conduct an annual review:

(a) N/A – initial review has already occurred; and

(b) for each subsequent Review, on the day which starts 12 months from the day the prior Review was finished.

8. Review Trigger Information Requirements

Complaints

Complaints received about the Company's products must be escalated in accordance with the Company's internal dispute resolution policy. The Chief Executive Officer must, within 10 business days following the end of each quarter in a financial year report to the Board:

(a) whether the Company received complaints in relation to the Company's products during the quarter; and

(b) the number of complaints received (if any).

Significant dealings outside the target market

Representatives must notify the Chief Executive Officer if they become aware of a significant dealing in relation to the product that is inconsistent with this target market determination as soon as practicable but no later than 10 business days after they become aware of the significant dealing.