

Product Suitability Policy - Notice

Policy Objectives

Our First Business 30 and First Business 3 loan products are commercial loan products and as such are not regulated by the National Consumer Credit Protection Act (NCCP).

It is therefore incumbent on us to ensure our products, and the way we offer those products, are not done in a way which breaches any laws and occurs in good faith. This policy outlines how we navigate these issues and determine product suitability for our Customers.

Why We Assess Product Suitability

We consider product suitability to help ensure good customer outcomes. We undertake this assessment to minimise the risk of Customers entering unsuitable contractual arrangements and to ensure compliance with the law and banking regulations.

Our products are designed for a variety of business purposes. They are not designed for personal, domestic or household purposes.

We do not and cannot give our customers financial or legal advice.

What we do is:

1. Review and assess the information and documentation provided by customers and their mortgages brokers for suitability with our products;
2. Seek additional information and ask more questions if the circumstances warrant it;
3. Include warnings and notices in our product materials to ensure customers are aware that the NCCP does not apply to the loan product;
4. Ensure customers have the opportunity to seek financial and legal advice and require advice be obtained by them in some circumstances;
5. Speak with our customers to ensure they understand the nature, purpose and risks of the proposed loan; and
6. Reject unsuitable applications that are assessed as being incompatible with the design and intended use of the product.

How We Assess Product Suitability

Step 1	What we do
Application is received from an Accredited Broker who is familiar with our products, their design and intended use	<ol style="list-style-type: none">1. Review proposed borrower(s) and guarantor(s).2. Review incorporation date and ASIC status of the company applicants.3. Determine whether guarantor(s) are directors / shareholders of company applicants.4. Consider the stated purpose of the loan.5. Consider the applicant's ability to service and repay the loan.6. Consider the security being provided and its ownership.7. Review the supporting documentation, ensuring the supporting documentation substantiates the content of the application.8. Note any anomalies or vulnerabilities.9. Request financial information about the applicants from the mortgage broker. The request makes it clear that all parties must have a genuine nexus with the transaction and reminds all parties this is a commercial product to which NCCP protections have no application.10. Conduct pre settlement calls (recorded) with all individuals involved in the loan seeking confirmation that (1) the company applicant is genuinely involved in the transaction and (2) that they are aware the NCCP (and its protections) will not apply to the loan product.11. Ensure all individual applicants obtain independent legal advice.
Step 2	What we do
If any concerns are raised in the above review	Conduct an enhanced due diligence assessment to determine product suitability.