

Target Market Determination

This Target Market Determination (**TMD**) is made in accordance with RMBL Investment Limited's ACN 004 493 789 (**RMBL**) obligations to comply with the Design and Distribution Obligations (**DDO**) under the Corporations Act 2001 in respect of the RMBL Mortgage Income Investments Scheme (**Scheme**).

The information contained in this TMD is not intended to be general or personal advice and is not a Product Disclosure Statement (**PDS**) – a copy of the PDS for the Scheme can be found at www.rmb.com.au/invest.

Members should read the PDS in conjunction with this TMD and seek independent financial advice if they are unsure if the Scheme is suitable for their objectives, financial situation and needs.

A reference to a Member in this TMD is a reference to both prospective and actual Members of the Scheme.

Details of Issuer, Scheme and Currency of TMD

Issuer:	RMBL Investments Limited ACN 004 493 789
Issuer AFSL Number:	223246
Scheme Name:	RMBL Mortgage Income Investments Scheme
Scheme ARSN:	091 248 289
TMD Approval Date:	5 October 2021
TMD Version:	1

Summary of Scheme

An investment into a Sub Scheme (**Loan**) of the Scheme is an investment in a specific loan which is secured by a registered first mortgage in the name of RMBL on trust for Members invested in the Loan. The Scheme is not a pooled scheme and therefore, Members consent to the Loans into which their funds are invested.

Loans are secured by Security Properties such as vacant land, completed residential property, completed apartments, residential subdivisions, residential construction, industrial and commercial construction, industrial subdivision and rural property. Details of each specific loan are included in a Supplementary Product Disclosure Statement (**SPDS**) provided to a Member prior to investment into a Loan.

Summary of Target Market

An investment in the Scheme is likely suited to both retail and wholesale Members with an investment timeframe of between 1 to 3 years (with the ability to extend their investment timeframe where the Loan is not paid out on the Loan due date), requiring a monthly income stream with some ability to suffer capital or interest loss, where the Member pays no fees.

A minimum initial investment amount of \$10,000 is required (or a lesser amount at the discretion of RMBL), with additional minimum investment amounts of \$1,000 (or multiples thereof).



Excluded Target Market








RMBL Investments Limited (ACN 004 493 789, AFSL 223246) is the Responsible Entity of the RMBL Mortgage Income Investments Scheme (ARSN 091 248 289)







The Scheme is **not suited** to those Members:

- with an investment timeframe of less than 1 year or with no capacity to extend their investment timeframe;
- seeking capital growth; or
- who require a capital or income guaranteed product.

Detailed Description of Target Market

Legend:  Likely in Target Market  May be in Target Market depending on circumstances  Not in Target Market

Member objectives, needs and circumstances	Likely Suitable?	Comments including Scheme Attributes
MEMBER TYPE – what structure is the Member intending to make their investment in the Scheme through?		
Individual		The Scheme is suitable for and open to all types of Members.
Company		
Trust		
Superannuation Trustee		
Partnerships and Associations		
MEMBER OBJECTIVES – what is the Member wanting to achieve from their investment?		
Capital Growth		
Capital Preservation		






Member objectives, needs and circumstances	Likely Suitable?	Comments including Scheme Attributes
Capital Volatility		<p>The Scheme is not designed to achieve capital growth.</p> <p>An interest in the Scheme or a Loan is not capital guaranteed. Interest is also not guaranteed and is connected to the Borrower's payment of interest on the loan to RMBL.</p>
Scheme Capital Guaranteed		<p>A Members exposure to risk of capital loss is limited to the specific Loan they are invested in, as the Scheme is not a pooled fund.</p>
Regular Income		<p>The Scheme is designed to pay regular interest income. Reinvestment of interest is available at a Member's choice.</p>
		<p>Capital is returned to Members at the expiry of a Loan or can be reinvested into another Loan if a Member wishes to continue with their investment in the Scheme.</p> <p>If the Loan is renewed Members have the option of reinvestment in that Loan, in addition to repayment of their capital or investment into a different Loan.</p> <p>Please note: All of the above, is always subject to the Borrower not being in default and in the case of expiry of a Loan, subject to the Borrower repaying the Loan in full.</p>
MEMBER DIVERSIFICATION NEEDS – whether an investment in the Scheme is the Member's only investment or part of a diversified portfolio of investment		
Only investment		<p>A minimum investment amount of \$10,000 is required, with additional minimum investment amounts of \$1,000. There is no maximum amount of investment.</p> <p>Investing solely in the Scheme or a single Loan may be suitable for a Member depending on the quantum of the investment. Members should seek independent financial advice before they invest their funds into the Scheme or a single Loan.</p>
Large percentage of overall investment		<p>Members can split their investment amount into different Loans to achieve diversification of their investment within the Scheme.</p>
Small percentage of overall investment allocation		

Member objectives, needs and circumstances





Likely Suitable?

Comments including Scheme Attributes

MEMBER'S INVESTMENT TIMEFRAME – how long does the Member want to invest their funds for before they require return of their capital?

Less than 1 year		Loan durations are generally between 1 and 3 years, but some Loans do have a duration of less than 1 year and in rare cases may exceed 3 years. The SPDS details the remaining term of a Loan.
1 -2 years		
2 – 3 years		In accordance with the Scheme Constitution and PDS, once invested into a Loan, a Member will only be able to withdraw capital if a Borrower repays the Loan or at the discretion of RMBL. RMBL's discretion is subject to the loan not being in default and there being a replacement Member available to replace the Member's investment in the Loan and that replacement Member completing all required investment documentation .
3 - 5 years		Members should inform RMBL of their investment timeframe when applying to invest in the Scheme so that this can be considered when offering Loans to the Member.
5 years plus		

MEMBER'S RISK PROFILE – what is the Member's ability or tolerance to suffer a capital loss?

Very high		RMBL does not guarantee capital. A Member's right to repayment of their capital is linked to: (a) the Borrower repaying the Loan amount; or (b) otherwise the proceeds available from RMBL enforcing its rights to sale of a Security Property.
High		
Medium		
Low		

Member objectives, needs and circumstances	Likely Suitable?	Comments including Scheme Attributes
MEMBER'S LIQUIDITY REQUIREMENTS – how quickly does the Member need to be able to withdraw their investment?		
Daily	✘	<p>As discussed above, once invested in a Loan, a Member will only be able to withdraw their capital:</p> <ul style="list-style-type: none"> (a) if a Borrower repays the Loan; or (b) at the discretion of RMBL.
Weekly	✘	<p>RMBL's discretion is subject to there being a replacement Member available to replace the Member's investment in the Loan and that replacement Member completing all required investment documentation.</p>
Monthly	✘	<p>Repayment of a Member's capital is also always subject to a Borrower not being in default.</p> <p>Where the Loan duration is less than a year or a Member is allocated to a Loan with less than a year remaining before repayment, capital may be able to be withdrawn within a year.</p>
Quarterly	✘	<p>Repayment of capital upon maturity of Loan is subject to:</p> <ul style="list-style-type: none"> (a) in the case where the Borrower wishes to extend the term of the Loan, if the Valuation Report obtained at this time indicates that the underlying Security Property for the Loan is still within an acceptable LVR – if the LVR is exceeded, this must be returned to an acceptable level before funds can be returned to Members.
Yearly	⚠	<ul style="list-style-type: none"> (b) In the case of an expiring Loan, the repayment of the full Loan amount by the Borrower.
Upon Repayment of Loan	✔	<p>IMPORTANT: there may be a delay between the Due Date of the Loan and full repayment of the Loan, due to circumstances beyond RMBL's control. Members' funds continue to earn interest until full repayment of the Loan and capital is returned once full repayment has been made by the Borrower.</p> <p>Page 20 of the PDS provides additional details.</p>

Appropriateness

RMBL has considered its Scheme against the Member objectives, needs and circumstances as set out in the Detailed Description of Target Market table (**Table**) and the key attributes of the Scheme as also outlined in the Table and has concluded that the Scheme's key attributes are likely to be consistent with the likely objectives, needs and circumstances of the Target Market as indicated in the Table.

Distribution Conditions

Any person engaging in retail product distribution conduct in connection with the Scheme must have regard to the terms of this TMD before recommending to a potential Member that they invest in the Scheme.

RMBL has considered its current distribution channels, which include direct distribution resulting from word of mouth and the RMBL website, distribution via its Authorised Representatives in addition to distribution through recommendations made by financial planners, familiar with the Scheme and who are required to comply with best interests' duties.

Having regard to the history and nature of this distribution which has a strong track record of distribution to Members within the stated Target Market for the Scheme, RMBL is confident that continuing to distribute the Scheme through these distribution channels will limit distribution to the Target Market. Therefore, no further distribution conditions apply to the Scheme.

Significant Dealings

In the context of the Scheme, RMBL considers a Significant Dealing would be more than **20 Members** acquiring the Scheme **in a 3-month period** that are **in the Excluded Target Market**.

Reviews of the TMD

RMBL will review this TMD on at least an annual basis. The maximum period of time from the date of issue/last review within which the this TMD must be reviewed again is 5 October in the immediately following year.

Other triggers for review of this TMD include:

- material changes in the law affecting the Scheme and its suitability for the Target Market;
- events affecting similar products as the Scheme in the market which may impact on the Scheme;
- major impacts in the real estate market or construction industry which may impact on the Scheme;
- 10 or more dealings in the Scheme to Members in the Excluded Target Market, within a three-month period.

Distributor Reporting Requirements

All Distributors of the Scheme are required to report the following information to RMBL by emailing the information to DDO@rmb.com.au within the specified timeframes below:

Reporting Matter	Reporting Timeframe
<p>Complaints: a complaint about the Scheme, distinct from any financial advice provided in connection with the Scheme.</p>	<p>Within 10 business days of the end of each quarter (March, June, September and December).</p>
<p>Significant Dealings: where the Distributor has recommended to 20 Members in a 3-month period who are in the Excluded Target Market that they acquire an interest in the Scheme or provide a Scheme PDS to 20 Members in a three-month period who are in the Excluded Target Market.</p>	<p>As soon as possible, but in any event within 5 business days of becoming aware of the significant dealing.</p>
<p>Source: the circumstances in which the Distributor came to distribute the Scheme to the Member, where the circumstance is not providing financial advice.</p>	<p>Within 10 business days of the end of each quarter (March, June, September and December).</p>
<p>Advertising or Promotional Activity: details of any advertising or promotion that the Distributor undertook in connection with the Scheme.</p>	<p>Within 10 business days of the end of each quarter (March, June, September and December).</p>