Target Market Determination

Stash Me Ltd (trading as Brolly): Small Loans and Lending Platform

Product	Small loans and lending platform
Date TMD Approved	Version 1 FINAL - 30 April 2025
TMD Version	Version 2
TMD Status	Current
Issuer	Stash Me Ltd ACN 676 699 531 (trading as Brolly)
Latest review	April 2026
Review outcome	No substantive change to the determination
Next periodic review	By April 2027, unless a review trigger requires an earlier review

Current Target Market Determination. Originally approved 30 April 2025 and reviewed in April 2026. No substantive changes were required.

About this Target Market Determination

This is the target market determination (TMD) for the purposes of section 994B of the Corporations Act 2001 (Cth) (Corporations Act) for the Brolly lending platform that enables eligible lenders to advance eligible borrowers small loans of under $2,000. Brolly will itself also provide loan contracts through the platform (collectively “the Brolly product”). Brolly is not a bank.

The issuer and distributor of the Brolly product is Stash Me Ltd (trading as Brolly) (Brolly). This TMD sets out certain information relevant to Brolly’s compliance with the design and distribution (DDO) framework in the Corporations Act, including the:

- class of consumers that comprise the target market for the Brolly product;
- conditions that will be imposed on the distribution of the Brolly product;
- requirements for Brolly to review the TMD; and
- requirements for Brolly to report certain information as the distributor of the Brolly product.

This TMD does not provide a complete list of the features and terms and conditions of the Brolly product. This TMD should be read in conjunction with the Terms and Conditions and other information available on Brolly’s website in relation to the Brolly product. A copy of these documents is provided to a consumer when they apply for the Brolly product. If an application for the Brolly product is approved, the Terms and Conditions, TMD will apply to the Brolly 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 Brolly product should consider how it may affect their personal circumstances. This TMD is general in nature and should not be construed as financial advice.

Target Market Summary

This product is likely to be appropriate for a consumer seeking fast, unsecured, short term finance of 30 days, for a small amount (of up to $2,000), to be used for personal purposes and who meets our eligibility criteria.

Further detail in relation to the target market is set out below.

Description of Target Market

Product Description including Key Attributes

The Brolly product has the following key attributes:

- it provides credit of an amount of up to $2,000 (this may be subject to a higher amount where the customer is a Premium Brolly Borrower (a Borrower who, at Brolly’s sole discretion, consistently repays loans on time, achieving a high-profile score via the Brolly Risk and Points Engine. This status may unlock higher loan limits (up to $2,000), reduced service fees, or priority loan approvals, as determined by Brolly, to reward responsible financial behaviour);

- it provides credit for a fixed term of 30 calendar days duration with the option to extend for 30 days then principal must be repaid;
- it provides credit for personal purposes;
- the loan is unsecured;
- the loan amount (minus the Service fee) is paid to a consumer in a single lump sum;
- the loan is non-revolving and is not a continuing line of credit and once a consumer has repaid the loan, or any part of it, it cannot be redrawn;
- Repayments to the loan amount must be made by one amount in full, so that the loan amount owning for each loan contract is paid in full by the due date, which is 30 calendar days from the time that the loan contract comes into effect (with the option to extend for 30 days then principle must be repaid), as shown via the App.
- No partial payment options are available;
- fees and costs are payable in respect of the product and include a fixed access fee of 5%. However, where a Borrower has not repaid the loan in full by the required time period, Brolly will attempt to recover the outstanding loan amount as well as enforcement fees and costs incurred to enforce the Borrower's loan contract ;
- No interest charges payable in respect of the loan amount;
- it is only available to consumers that meet our eligibility criteria; and
- Repayments may be made in the following manner via the App: direct debit from the customer's nominated bank account, BPay if facilitated by the nominated bank or transferring funds from the customer's bank account to their account using Pay ID or account details.

Target Market Description

Eligibility Criteria

Consumers in the Target Market	Consumers not in the Target Market
Consumers in the target market have the following eligibility characteristics: aged 18 years of age or older; A resident in Australia and are either an Australian citizen or permanent Australian resident; have a valid Australian bank account; able to successfully verify your identity in accordance with Brolly's policies and any relevant regulatory requirements;	Consumers not in the target market do not meet the eligibility characteristics including persons under 18 or not resident in Australia.

Needs and objectives

Consumers in the Target Market	Consumers not in the Target Market
The likely needs and objectives of consumers in the target market include: consumers who require credit for personal purposes; consumers who are seeking a loan for a small amount (up to $2,000); consumers who are seeking a short-term loan for a fixed period of 30 calendar days with an option to extend for an additional 30 days; consumers who are seeking an unsecured loan; and consumers who are seeking a loan with the certainty of fixed 30 calendar days lump sum payment, with the ability to make early repayments with no early repayment fees or termination fees.	The likely needs and objectives of consumers not in the target market include: consumers who require credit for an unacceptable purpose. For example: for a purpose that is illegal or immoral; for repaying other forms of credit; for a purpose that indicates substantial hardship; and / or for a purpose that is deemed a breach of a relevant legislative requirement; consumers who are seeking a loan for an amount of no more than $2,000; consumers who are seeking a loan that can be repaid over a period longer than 30 calendar days; consumers who are seeking to make partial repayments under the loan amount; consumers who are seeking a loan that is secured; and / or consumers who are seeking a loan that is a form of revolving credit or a continuing line of credit.

Financial Situation

Consumers in the Target Market	Consumers not in the Target Market
The likely financial situation of consumers in the target market include: consumers who have a regular income; and consumers who have the financial capacity to pay the principal repayments and fees for the product when such amounts become payable and due under the Credit Contract.	The likely financial situation of consumers not in the target market include: consumers who do not have the financial capacity to pay the principal repayments and fees for the product when such amounts become payable and due under the Credit Contract. For example: consumers who gamble excessively (for example, where 30% or more of net (after tax) income is spent on gambling); consumers who have an unacceptable history of dishonors and / or defaults on existing credit commitments; and/or consumers who have an unacceptable number of similar loans.

Appropriateness

Brolly 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 the key attributes of the product (including the eligibility criteria) set out above under the ‘Description of product including key attributes’ section, are likely to be suitable for consumers with the attributes identified in the column ‘Consumers in target market description’ section.

How this product is to be distributed - Distribution Conditions

The conditions and restrictions which apply to distribution of the product are set out below.

This product is authorised to be distributed by Brolly by any of the following means:

- online through the Brolly website (https://stashme.app);
- through the Brolly iOS and Android App (stashme.app).

Brolly considers that the distribution conditions make it likely that consumers who acquire the product will be in the target market because:

- the product can only be distributed directly by Brolly through Brolly’s official lending platform;
- the product can only be distributed to people who meet standard eligibility criteria and in compliance with relevant laws; and
- the online application incorporates auto-decisioning elements that ensures that applicants who do not satisfy certain eligibility criteria cannot proceed with an application.

Reviewing this Target Market Determination

Period Reviews

Initial Review	Subsequent Review
Within 1 year of the TMD approved date	At least every 1 year from the initial review date

Review Triggers

Review Trigger	Description
Complaints	If Brolly receives a significant increase in the number of complaints beyond expected levels or a significant change in the nature of the complaints.
Consumers outside of target market	The issuer identifies a number of consumers outside of the target market that has acquired the product
Consumers inside of target market but product unsuitable	The issuer identifies a number of consumers inside of the target market, who acquired the product, but for whom the product is not suitable
Material change to product	The is a material change to the product structure (including its key attributes), terms and conditions or its distribution
Significant dealings	The issuer identifies a significant dealing has occurred that is not consistent with the target market and is required to be reported to ASIC
Hardship applications	There is an unusual number of agreed hardship arrangements.

Review Trigger	Description
No payments	The percentage of originated loans within a calendar quarter that go 61 days or more without making a payment, noting Brolly provides credit for a fixed term of 30 calendar days, with the option to the extend for 30 days.
Material change in legislation	If there is a change in law or its application, a change in a relevant industry code, or ASIC or other regulatory guidance, that materially affects the product. There is a material change in the regulation of small amount credit contracts under the National Consumer Credit Protection Act 2009 and associated regulations
Material incident	If there is a material incident or a significant number of incidents, which relate to consumer use of the products which shows that the product is not being used for the purpose of which it is designed.

Information Reporting Requirements

This table sets out the information we need to identify whether a review trigger, or another event or circumstance that would reasonably suggest that the TMD is no longer appropriate, has occurred, who is required to report this information and the reporting periods.

Information	Who is required to report	Reporting Period
The number, nature of and resolution of complaints (as defined in section 994A of the Corporations Act)	Issuers and Distributor	Quarterly within 10 business days from the end of the period
Details of a consumer identified as being outside of the target market	Issuers and Distributor	As soon as practicable but within 10 business days after becoming aware
Details of a consumer identified as being inside the target market, but for whom the product is not suitable.	Issuers and Distributor	As soon as practicable but within 10 business days after becoming aware
A material change to the product structure (including its key attributes) or its distribution	Issuers and Distributor	As soon as practicable but within 10 business days after becoming aware
Details of a significant dealing that is required to be reported to ASIC	Issuers and Distributor	As soon as practicable but within 10 business days after becoming aware
The number of hardship applications received	Issuers and Distributor	Quarterly within 10 business days from the end of the period
The number of originated loans that go 62 days or more without making a payment	Issuers and Distributor	Quarterly within 10 business days from the end of the period
A material change in regulation of small amount credit contracts under the National Consumer Credit Protection Act 2009 and associated regulations, law or its application, a change in a relevant industry code, or ASIC or other regulatory guidance, that materially affects the product.	Issuers and Distributor	As soon as practicable but within 10 business days after becoming aware

End of Target Market Determination