Effective Date: 5 August 2022

Status: Historic

OVERDRAW FEATURE AVAILABLE ONLY THROUGH ANZ PRIVATE

TARGET MARKET DETERMINATION

PURPOSE OF THIS DOCUMENT

ANZ is legally required to prepare this Target Market Determination (TMD). The TMD describes the class of customers the Overdraw Feature has been designed for, the conditions under which the Overdraw Feature must be distributed and how ANZ will review this document so it remains appropriate.

TARGET MARKET

ANZ has identified the target market for the Overdraw Feature and its key attributes that meet the needs, objectives and financial situation of customers in the target market as follows:

The Overdraw Feature has been designed for customers who:	Key attributes of the Overdraw Feature that make it appropriate for the target market:
Are customers of ANZ Private;	• Customer eligibility: ANZ Private Bankers may only approve a transaction which would overdraw an eligible ANZ account if the customer is a customer of ANZ Private.
Have an ANZ personal savings or transaction account;	• Eligible ANZ account: ANZ Private Bankers may only approve a transaction which would overdraw a customer's personal ANZ savings or transaction account ('eligible ANZ account').
 Attempt to make a payment from an eligible ANZ account where the account has insufficient funds to cover the payment; 	 Ad hoc approval: An ANZ Private Banker may, at their discretion, approve a payment from an eligible ANZ account where the account has insufficient funds to cover the payment.
	 Customer may decline an overdraw: Where an ANZ Private Banker approves an account overdraw, the ANZ Private Banker will contact the customer. A customer may direct the ANZ Private Banker not to approve an account overdraw.
	• Opt out: A customer may direct their ANZ Private Banker never to approve an overdraw on the eligible ANZ account.
Are comfortable paying interest if a transaction is approved which would overdraw the account; and	• Interest: Interest may be charged on any amount by which an eligible ANZ account is overdrawn.
 Will repay any overdrawn funds within a short period as agreed with the ANZ Private Banker who approves the relevant transaction. 	 Repayment: ANZ Private Bankers may approve a transaction which overdraws an eligible ANZ account on terms advised to the customer at the ANZ Private Banker's discretion.



DISTRIBUTION CONDITIONS

ANZ applies the following conditions and restrictions to the distribution of the Overdraw Feature so that the Overdraw Feature is likely to be provided to customers in the target market.

These conditions and restrictions:

- limit the channels through which the Overdraw Feature can be provided;
- ensure those who distribute the Overdraw Feature are adequately trained and accredited; and
- ensure ANZ only provides the Overdraw Feature in accordance with a consistent process.

	Condition	How does this make the distribution appropriate?	
Channel	The Overdraw Feature can only be provided to customers through the following channels: • ANZ Private.	By limiting channels, ANZ can ensure that the Overdraw Feature is only provided if the customer meets certain eligibility criteria and has been contacted by their ANZ Private Banker.	
Training & Accreditation	The Overdraw Feature can only be provided to customers by ANZ directly, or through authorised ANZ staff who are accredited and trained.	By applying training and accreditation standards to ANZ staff who distribute the Overdraw Feature, ANZ is ensuring: • background checks are conducted on relevant individuals; • those distributing the Overdraw Feature hold appropriate qualifications, are authorised to engage in distribution activities and are appropriately trained and accredited to ANZ standards; and • those distributing the Overdraw Feature understand the distribution process ANZ requires them to follow, as well as the legislative framework relevant to their activities.	
Process	The Overdraw Feature can only be provided to customers by following ANZ's processes, including making relevant enquiries into the customer's needs and contacting the customer for each overdraw.	By requiring an ANZ Private Banker to contact the customer for each overdraw, ANZ can ensure enquiries are made to determine whether the client has funds in other ANZ accounts which will be used to repay the overdrawn amount, or the ANZ Private Banker is otherwise comfortable that the overdraw is to manage a temporary shortfall in the account caused by administrative or liquidity issues which do not indicate that the customer requires a credit facility.	

REVIEW OF THE TARGET MARKET DETERMINATION (TMD)

ANZ will review the TMD periodically to ensure it remains appropriate.

Periodic Reviews of the TMD	Timing
• Initial review	• No later than 18 months from the date the TMD is made.
Subsequent ongoing review	No later than 18 months from the date of the previous review.

Review Triggers

In addition, ANZ will review this document earlier if one or more of the following occurs, where they reasonably suggest that the TMD is no longer appropriate:

- There is a material change to the Overdraw Feature or its distribution. For example, a change to a key attribute or a material change to a distribution channel.
- There is a change in law or its application, a change in relevant industry code, an AFCA determination, a court decision, or ASIC or other regulatory guidance or action that materially affects the Overdraw Feature. For example, if a change in the law requires ANZ to change or remove a key attribute or a product intervention order is made by ASIC in respect of the Overdraw Feature.
- There is a significant increase beyond expected levels in complaints or disputes, or a significant change in the nature of complaints or disputes relating to the Overdraw Feature.
- ANZ has information about the way in which the Overdraw Feature is being distributed, operating or being used by customers that reasonably suggests the TMD is no longer appropriate. For example, ANZ will monitor any significant increase in the number of accounts with an informal overdrawn balance for a prolonged period.
- Any other event occurs or information is received (for example, significant dealings in the Overdraw Feature that are not consistent with the TMD) that reasonably suggests the TMD is no longer appropriate.

REPORTING

Regulated persons must provide the following information to ANZ:

Category	Description	Reporting period	Reporting timeframe
Complaints	 Whether any complaints relating to the Overdraw Feature were received during the reporting period; and If so: the number of complaints received during the reporting period; and the substance of those complaints and any general feedback relating to the Overdraw 	Every calendar quarter.	As soon as practicable and in any case within 10 business days of the relevant reporting period.

IMPORTANT INFORMATION

This target market determination is not a recommendation, opinion or advice that any person acquire the Overdraw Feature or is within the target market for the Overdraw Feature. It does not summarise the terms or risks of the Overdraw Feature and is not an offer of, or invitation to apply for, the Overdraw Feature to any person in Australia or elsewhere. It does not set out all obligations of regulated persons in relation to the Overdraw Feature or this target market determination. Go to https://www.anz.com.au/support/rates-fees-terms/target-market-determinations for more information about target market determinations.