Effective Date: 31 March 2023

Status: Current

# **ANZ CLIENT MONIES ACCOUNT**

## 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 product has been designed for, the conditions under which the product must be distributed and how ANZ will review this document so that it remains appropriate.

### **TARGET MARKET**

ANZ has identified the target market for ANZ Client Monies Account and the key attributes of the product that meet the needs, objectives, and financial situation of customers in the target market as follows:

ANZ Client Monies Account has been designed for customers who:	Key attributes of ANZ Client Monies Account that make this product appropriate for the target market:
are carrying on a business in the course of which they may hold client money;	• Eligibility: available for customers who are carrying on business in the course of which they may hold client money. ANZ Client Monies Account is not directly available to the clients of the customer.
<ul> <li>require access to client funds on demand and want to have the ability to make and receive payments frequently through one or more of the payment methods offered by ANZ; and</li> </ul>	Access to funds: allows customers to access client funds on demand and make or receive payments via multiple channels (including digital and online).
<ul> <li>have sophisticated needs that can be best met by banking products and services offered by ANZ's Institutional Division.</li> </ul>	Channels: compatible with channels and/or additional services offered by ANZ's Institutional Division.

# **DISTRIBUTION CONDITIONS**

ANZ applies the following conditions and restrictions to the distribution of ANZ Client Monies Account, so that it is likely to be issued to customers in the target market.

These conditions and restrictions:

- limit the channels through which the product can be provided;
- ensure those who distribute the product are adequately trained and authorised; and
- ensure ANZ only distributes the product in accordance with a consistent application and assessment process.

	Condition	How does this make the distribution appropriate?	
Channel	<ul> <li>ANZ Client Monies Account can only be issued to customers through the following distribution channels:</li> <li>ANZ Institutional; and</li> <li>ANZ Commercial.</li> <li>ANZ Client Monies Account cannot be issued to customers by third parties.</li> </ul>	By limiting channels ANZ can ensure that applications for ANZ Client Monies Account are only received through channels that are subject to appropriate conditions, controls and/or monitoring.	
Training & Authorisation	ANZ Client Monies Account can only be issued by ANZ directly or through ANZ staff who are authorised and trained.	By applying training and authorisation standards to ANZ staff, ANZ is ensuring:  • background checks are conducted on relevant individuals;  • those distributing the product hold appropriate qualifications, are authorised to engage in activities and are appropriately trained to ANZ standards; and  • those distributing the product understand the distribution process ANZ requires them to follow, as well as the legislative framework relevant to their activities.	
Process	<ul> <li>ANZ Client Monies Account can only be issued to customers by:</li> <li>following ANZ's customer application and assessment process applicable to a customer holding client monies, including making relevant enquiries into the customer's product needs as a holder of client monies.</li> </ul>	By applying its application and product selection process, ANZ makes enquiries to determine whether the product is consistent with the likely needs, objectives and financial situation of the customer in holding client monies.	

### REVIEW THE TARGET MARKET DETERMINATION (TMD)

ANZ will review this 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 factors occurs, where they reasonably suggest that the TMD is no longer appropriate:

- There is a material change to the product or its distribution for example, a change to a key product 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 or a court decision, or ASIC or other regulatory guidance or action that materially affects the product. For example, if a change in the law requires ANZ to change or remove a key product attribute or a product intervention order is made by ASIC in respect of the product.
- 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 product.
- ANZ has information about the way in which the product is being distributed, operating or being used by customers that reasonably suggests the TMD is no longer appropriate. For example, ANZ will monitor:
  - number of customers who opt to close the account shortly after acquiring the product; and
  - customer segments in which accounts are opened.
- Any other event occurs or information is received (for example, significant dealings in the product that are not consistent with the TMD) that reasonably suggests the TMD is no longer appropriate.

#### **REPORTING**

Regulated persons may engage in retail product distribution conduct in respect of ANZ Client Monies Account (for example, where the regulated person is an Investor Directed Portfolio Service (IDPS) or IDPS-like scheme or receives a direction from their end client to deposit funds with ANZ).

Regulated persons must provide the following information to ANZ:

Category	Description	Reporting period	Reporting timeframe
Complaints	<ul> <li>Whether any complaints relating to the product were received during the reporting period; and</li> <li>If so: <ul> <li>the number of complaints received during the reporting period; and</li> <li>the substance of those complaints and any general feedback relating to the product or its performance.</li> </ul> </li> </ul>	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 product or is within the target market for the product. It does not summarise the terms or risks of the product and is not an offer of, or invitation to apply for, the product to any person in Australia or elsewhere. It does not set out all obligations of regulated persons in relation to the product or this target market determination. Click <a href="here">here</a> or visit <a href="https://www.anz.com.au/support/rates-fees-terms/target-market-determinations">https://www.anz.com.au/support/rates-fees-terms/target-market-determinations</a> for more information about target market determinations. Click <a href="here">here</a> or visit <a href="https://www.anz.com/institutional/solutions/">https://www.anz.com/institutional/solutions/</a> for information about ANZ Institutional products and solutions.