



Quarterly Compliance Statement

Version 1.0
Effective Date: 1 June 2022

Quarterly Compliance Statement

From 5 October 2021, the Design and Distribution Obligations (**DDO**) specified in Part 7.8A of the *Corporations Act 2001 (Cth)* came into effect for all issuers and distributors of credit and financial products that are covered by DDO. DDO requires issuers and distributors of financial products to have a consumer-centric approach to the design and distribution of their products, with the aim of helping consumers to obtain financial products that are appropriate for their likely objectives, financial situation and needs.

A Target Market Determination (**TMD**) seeks to provide consumers, staff and distributors with an understanding of the class of consumers for which certain Origin Mortgage Management Services a trading name of Columbus Capital Pty Ltd ACN 119 531 252 Australian Financial Services Licence and Australian Credit Licence No. 337303 (**Origin MMS**) products have been designed (the target market), having regard to their likely objectives, financial situation and needs. The TMDs are not a full summary of the product's terms and conditions and are not intended to provide financial advice. Consumers must refer to the General Terms and Conditions and Visa Debit Terms and Conditions and any supplementary documents when making a decision about Origin MMS products, and to seek financial advice if appropriate.

The effective date of the Origin TMDs are specified in each TMD document. Historical versions of our TMDs can be obtained by going on the Origin MMS website at <http://originmms.com.au/target-market-determinations>

1. Information for You our Distributors

The following information is provided to assist you as our distributors of Origin MMS products (**Distributors**) in meeting both of our obligations under DDO.

Under DDO, Distributors must:

- (a) take reasonable steps that will, or are reasonably likely to, result in distribution of an Origin MMS product being consistent with its TMD;
- (b) comply with distribution conditions specified in the TMDs, our *Product Design & Distribution Fact Sheet for Distributors* provided to you and any other requirements advised by us;
- (c) generally, not distribute an Origin MMS product unless there is a TMD;
- (d) report information to Origin MMS as specified in the Origin MMS product's TMD;
- (e) have robust product governance arrangements in place to help ensure that you comply with your DDO obligations; and
- (f) keep records of distribution information in relation to Origin MMS products covered by a TMD for up to seven years.

2. Distributor reporting requirements

Distributors via the Quarterly Compliance Statement are required to report the following information to Origin MMS:

- (a) the number of complaints the distributor receives during that reporting period in relation to an Origin MMS product and the substance of those complaints; and
- (b) any other information (if any) specified in the Origin MMS product's TMD acquired by the Distributor during the reporting period.

The reporting period is specified in the Origin MMS product TMDs and this Mortgage Management Compliance Statement must be provided by the Distributors within 10 business days after the end of each calendar quarter.

If a distributor becomes aware of a significant dealing, it must notify Origin MMS in writing as soon as practicable, and in any event within 10 business days after becoming aware.

3. What is a Significant Dealing?

A significant dealing is distribution of a product that is inconsistent with its TMD. Whether or not a dealing is significant will depend on a variety of circumstances, including:

- (a) A significant proportion of consumers who have acquired the product but are not in the target market, including consumers who have been specifically excluded from the target market.
- (b) The actual or potential harm and financial loss to consumers that have acquired the product but are not in the target market.
- (c) The nature and extent of any inconsistency of product distribution with this TMD.
- (d) A significant amount of superannuation contributions paid, or funds transferred to the product from consumers outside the target market.

You as the Distributor will need to make an individual assessment in the circumstances of each case to determine when a dealing (or dealings) inconsistent with the TMD is significant and needs to be reported to Origin MMS.

4. How can you report information to Origin MMS?

By completing the *Quarterly Compliance Statement* and providing any additional information as specified in the Origin MMS TMDs via email attention to *The Compliance Team* email: legal@colcap.com.au.