



# Target Market Determination (TMD)

MLC Pure Endowment

Issuer of this TMD: MLC Limited (MLCL)

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This product is closed to new consumers.

# About this document

The Target Market Determination (TMD) sets out who this product may and may not be suitable for, as well as the likely financial situation and needs of the consumer. It also outlines the triggers to review the target market, how it is to be distributed, and certain other information.

This document is not a Product Disclosure Statement (PDS) and is not a summary of the product features or terms of the product.

## Overview of the MLC Pure Endowment product

An MLC Pure Endowment policy is a bundled life insurance policy where the premium charged pays for the maturity benefit while the policy also accrues a death benefit or surrender amount. These components cannot be split.

The MLC Pure Endowment product provides for a maturity benefit to be paid upon the survival of the Life Insured to a specified date. A surrender value accrues on the policy, increasing over time to equal the maturity benefit at the maturity date. If the Life Insured dies on, or prior to the maturity date, the death benefit will be equal to the surrender value. If the policy is cancelled prior to the maturity date, the surrender value is paid. Any policy debts are always deducted from benefit or surrender amounts before a payment is made to the consumer.

MLC Pure Endowment policies accrue bonuses which add to the benefit amount payable and to the surrender value.

Additional benefits may have been added to policies to expand the insurance provided or to increase the amount of insurance in a cost-effective manner. However, these have all since expired. Benefits that were applicable to a policy were outlined in the product documentation and policy schedule.

This product is no longer open to new business, and no additional benefits can be added. Existing consumers can increase or decrease their insured amount and reinstate their policy if it lapses.

### Loan credit facility

A credit facility is available whereby a consumer may borrow money against the surrender value in their policy. This provides the consumer with cash when required while keeping their policy in force. This loan facility is provided for by MLC Limited under its Australian Credit License, which is governed by the National Consumer Credit Protection Act 2009.

Up to 90% of the surrender value may be taken as a loan. However, where any amount requested is above 70% of a policy's surrender value, the loan is subject to responsible lending obligations.

### Policy ownership

MLC Pure Endowment policies may be owned by individuals (including multiple people), companies, trusts, partnerships, sole traders and superannuation trustees (of both complying and non-complying APRA funds).

Where a policy is owned by a superannuation trustee (commonly known as an external trustee), that trustee administers their fund's responsibilities. Non-super policy and superannuation trustee owned policies are the same, with the only difference being the bonus rate applied on policies that have earnings. If the superannuation fund is a complying APRA fund (as recorded by the ATO), then superannuation bonus rates are applied to the policy. If the superannuation fund is non-complying, then non-super bonus rates are applied. Fund compliance is monitored and communicated with superannuation trustees each year.

# Key things to know

This product is closed to new consumers and is dedicated only to existing consumers.

The consumers in the target market must either be an Australian citizens, Australian permanent residents, or New Zealand citizens residing in Australia, or Consumers with certain temporary visas subject to underwriting terms and conditions.

## Who the product may be suitable for

The target market includes:

- consumers who meet underwriting, residency and other eligibility requirements
- consumers who have the financial capacity to pay the premiums over the period they intend to hold the product, or at least for part of the period, and
- consumers who want to reduce their financial risk in the event of the life insured (either themselves or someone else) experiencing a claimable event, in accordance with the terms and conditions of the policy.

A consumer will still be considered within the target market and to have met eligibility criteria if:

- MLCL reinstate their policy within 24 months of the lapse date, due to non-payment of premium and/or loan debt accrual, provided they have satisfied MLCL's reinstatement requirements.
- They exercise an option to continue or convert cover under the policy terms of their policy.
- MLCL allow them to replace their existing cover as a result of a change of ownership.

## Who the product may not be suitable for

- Those who are not:
  - Australian citizens, or
  - Australian permanent residents, or
  - New Zealand citizens residing in Australia, or
  - Those with certain temporary visas who do not meet our underwriting terms and conditions in relation to residency.
- Those that do not meet the eligibility requirements (unless prior written approval has been provided).
- Those that do not meet the underwriting requirements.
- Certain occupations for some benefit types.
- Those contemplating self-harm.

## Likely financial situation of the consumer in the target market

The consumer should have the financial capacity to pay the premiums over the period they intend to hold the product, or at least for part of the period. If premiums are not paid when due, they will accrue a premium and interest debt, which will reduce the amount received when the consumer makes a claim or surrenders their policy. Alternatively, the consumer may choose to convert the policy to a paid-up policy, which will also reduce the amount they receive when they make a claim or surrender, however no further premiums will be payable.

The consumer must have at least one of the following potentially relevant sources of financial capacity:

- earning income
- personal savings
- superannuation, or
- family or other relationships, either personal or business.

# Target market for MLC Pure Endowment

## Likely objectives of consumers in the target market

The target market consists of existing consumers only who want to reduce their financial risk.

Financial risks include financial commitments (personal and commercial) and financial-in-kind commitments (including for business insurance purposes), where the consumer has a responsibility to pay money or provide goods or services. The consumer may currently be responsible, or anticipate being responsible, for these financial risks.

These financial or financial-in-kind commitments include, but are not limited to:

- mortgage and other debt servicing costs
- income or revenue replacement
- medical and rehabilitation costs
- schooling and education costs
- personal care
- palliative care
- business commitments, and/or
- business succession funding costs.

Benefit	The objective of consumers in the target market is to reduce their exposure to the following situations
Maturity benefit	<p>The consumer has (or envisages that in future they will or may have) a need for a lump sum payment at a specific future date to provide for a financial or financial-in-kind commitment (for themselves or other family members) upon their survival to the date specified. This will be satisfied by the payment of the:</p> <ul style="list-style-type: none"> <li>• Maturity benefit.</li> </ul>
Death Benefit	<p>The consumer has (or envisages that in future they will or may have) outstanding financial or financial-in-kind commitments (including financial commitments to dependents such as spouse or children) that will not be satisfied in the event of their/the Life Insured's:</p> <ul style="list-style-type: none"> <li>• Death (due to any cause), or</li> <li>• Terminal Illness (where available, this is the early payment of the Death Benefit where the Life Insured is diagnosed with a terminal illness and is likely to die within 12 months or is highly likely to die within 24 months).</li> </ul>
Bonus Earnings	<p>The consumer prefers to have their policy's benefits and surrender value increase with bonus earnings in the future.</p>
Certainty of Premium	<p>The consumer has, or potentially has, a need for constant insurance premiums into the future.</p>
Availability of CPI increases	<p>As an option, the consumer has (or envisions they will have in the future), the need to keep their benefits in line with increases in the Consumer Price Index (CPI) over time.</p>

### Meeting the needs of the target market

The target market comprises of existing consumers only. It includes those who have, or expect to have, outstanding financial commitments or goals to meet at the specified maturity date. Consumers must have the capacity to pay a fixed premium amount on an ongoing basis.

As the product pays a lump sum upon claim, it is therefore likely to meet the needs, or go towards meeting the needs, of those in the target market.

# Product description

## Claimable events

MLC Pure Endowment provides the full value of a lump sum payment (less any policy debts) if the Life Insured survives until the policy's maturity date.

Where a policy terminates before the policy maturity date, a reduced lump sum payment will be made for a:

- Death Benefit in the case where the Life Insured dies, or the
- Surrender value where the policy is cancelled.

A claim is only paid where the claimable event is in accordance with the terms and conditions outlined in the Customer Information Brochure (CIB), or Policy Document and the insurance cover is specified in the consumer's Policy Schedule.

## Premiums

Premiums are generally fixed for the duration of the policy. However, premiums may:

- increase with CPI (which in turn increases the Sum Insured),
- increase when the Sum Insured is increased by a sum nominated by the consumer, or
- decrease if the policy's Sum Insured is reduced.

Your premiums will change if:

- you add or remove a benefit option
- you change your benefit amount by CPI indexation, exercise the Increases without further medical evidence feature or by requesting an increase
- your policy is changed, such as to be made paid up
- the government makes changes to duties or charges, or
- we change the policy fees.

## Payment of premiums

Premiums can be paid on a monthly, quarterly, half-yearly or annual basis via direct debit, credit card, or BPay.

If premiums are not paid when due, and the policy has a surrender value, then the unpaid premium amount will attract an interest charge. Unpaid premium and interest together become a debt against the policy's surrender value and will reduce any benefit payable. Unless paid, this debt can lead to the policy lapsing. If this happens, the consumer will no longer have insurance cover and will not be eligible to make a claim.

## Eligibility criteria

Certain persons may be ineligible for cover if they do not meet the eligibility criteria for this product. The eligibility criteria of the life to be insured could include their:

- age
- employment status, and
- residency status.

## Benefit structures

Lump sum covers can be purchased as a stand alone benefit, independent of all other covers.

## Entry age

The entry age next birthday for both the Maturity benefit and Death Benefit is commonly 1–60.

It is important to note that entry ages may vary depending on original application terms.

## Exclusions

The exclusions that may apply include, but are not limited to:

Exclusion	Maturity benefit	Death Benefit	Accidental Injury benefit
Suicide or self-inflicted injury within 13 months of policy commencement, increase or reinstatement.	✓	✓	✓
Pre-existing injuries or conditions.	–	–	✓
Directly, or indirectly from committing, or attempting to commit, a Criminal Act.	✓	✓	✓

## Reinstatements

A consumer will still be considered within the target market and to have met eligibility criteria if:

- MLCL reinstate their policy within 24 months of the lapse date, due to non-payment of premium and/or loan debt accrual, they have satisfied MLCL's reinstatement requirements.
- They exercise an option to continue or convert cover under the policy terms of their policy.
- MLCL allow them to replace their existing cover as a result of a change of ownership.



# Distribution conditions

## For distribution via personal advice

- Distributor will assess requests for increases or other alterations for a consumer, taking into consideration demographic factors and eligibility requirements in the target market as set out above.
- Distributor must have attained a licensee and adviser code and accepted the MLCL Distribution Agreement.

## For distribution via general advice or no advice

- Distributor will assess requests for increase or other alterations for a consumer, taking into consideration demographic factors and eligibility requirements in the target market as set out above.

## Why these distribution conditions and restrictions will make it more likely that the consumers who acquire the product are in the target market

### For distribution via personal advice

Consumers of life insurance are more likely to be in the target market if distributors refrain from allowing applications into this product where consumers do not meet the relevant demographic and eligibility requirements.

### For distribution via general advice or no advice

Consumers of life insurance are more likely to be in the target market if applications are refused where the consumer does not meet the relevant demographic and eligibility requirements.

## When we review this document

The review for this TMD occurs within 12 months from the date of this TMD. Subsequent reviews occur at least every three years after the end of the previous review.

This TMD may be reviewed more frequently if a Review Trigger occurs.

Review triggers	Assessment information	Timeframe	Who is responsible
<p><b>1</b> The commencement of a significant change in law that materially affects the product design or distribution of the product or class of products that includes this product.</p> <p>Note: This trigger is a mandatory review. The product issuer may choose to undertake a review even if the above review trigger is not met.</p>	<p>Any relevant regulation, legislation and/or ASIC instruments relating to the change in law.</p>	<p>As new changes are introduced.</p>	<p>MLCL with information supplied.</p>
<p><b>2</b> Product performance is materially inconsistent with the product issuer's expectations, having regard to the:</p> <ul style="list-style-type: none"> <li>a. Lapse rate</li> <li>b. Claim decline rate</li> </ul>	<p>During the review period, the expected and actual:</p> <ul style="list-style-type: none"> <li>a. Lapse rate</li> <li>b. Claim decline rate</li> </ul> <p>The product issuer has detailed specific assessments for each trigger.</p>	<p>Aligned to TMD Review Period.</p>	<p>MLCL.</p>
<p><b>3</b> Significant or unexpectedly high number of complaints regarding product design, product availability, claims and distribution conditions that would reasonably suggest that the TMD is no longer appropriate.</p>	<p>Complaints (as defined in section 994A(1) of the Act) and the nature of the complaints regarding product design, product availability, claims and distribution condition.</p>	<p>As soon as practicable, or in any event, within 10 business days after the end of each calendar quarter.</p>	<p>MLCL and our distribution partners.</p>
<p><b>4</b> Material change to key product design, features, and/or fees that would reasonably suggest that this TMD is no longer appropriate.</p>	<p>Notification of proposed material change to key product design, features, and/or fees.</p>	<p>As material changes are made.</p>	<p>MLCL.</p>
<p><b>5</b> Significant Dealing in the product which the regulated person becomes aware is not consistent with the TMD.</p>	<p>A dealing in the product which the distributor (as the regulated person) becomes aware is not consistent with this TMD.</p>	<p>As a significant dealing is identified.</p>	<p>MLCL and our distribution partners.</p>

### Distributor reporting requirements

- Complaints (including the nature of the complaints) regarding product design, product availability, claims and distribution conditions must be reported as soon as practicable, or in any event, within 10 business days after the end of each calendar quarter.
- A significant dealing in the product which the regulated person becomes aware of is not consistent with the TMD should be reported as they are identified.

## **Legal disclaimer**

This Target Market Determination (TMD) is required under section 994B of the Corporations Act 2001 (Cth). It sets out the target market for the product, triggers to review the target market, how it is to be distributed and certain other information. It forms part of MLC Limited's design and distribution framework for the product.

This document is not a Product Disclosure Statement (PDS) and is not a summary of the product features or terms of the product. This document does not take into account any person's individual objectives, financial situation or needs. Persons interested in acquiring this product should carefully read the PDS before making a decision whether to buy this product.

This Target Market Determination (TMD) describes the class of consumers that comprise the target market for this product and matters relevant to the distribution and review of this product.

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