



Target Market Determination

1. Target Market Determination - Spriggy Schools

The Spriggy Schools product (**Spriggy Schools**) is a financial product for the purposes of the design and distribution obligations set out in Part 7.8A of the *Corporations Act 2001* Cth.

The purpose of this Target Market Determination is to provide consumers information about the Spriggy Schools' product's key attributes, the target market for Spriggy Schools, and the distribution and monitoring arrangements by Spriggy Schools Pty Ltd, the product issuer.

This document is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. Customers should refer to the Terms and Conditions available at www.spriggyschools.com.au/terms when making a decision about this product.

Date from which this Target Market Determination is effective

5 October 2021.

2. Target Market

The information below summarises the overall class of consumers that fall within the target market for the Spriggy Schools product, based on the product key attributes and the objectives, financial situation and needs that they have been designed to meet.

a) Class of consumers that fall within the target market

Spriggy Schools is built for Australian families who are looking for a convenient way to manage canteen, uniform and event ordering and payments online. The product is designed for parents or guardians (**Parents**) who have children in either primary and/or high school.

b) Description of Spriggy Schools and its key attributes

Spriggy Schools has a software system that enables schools and canteen providers to allow Parents to make school related purchases online without the need for physical cash. The key attributes are:

- i) Allows Parents to order items sold through the school or canteen provider including lunch and recess, uniforms and event related items, without using cash, via the web or mobile device.
- ii) Parents can top up their Spriggy Schools using an Australian debit card.
- iii) Balances and order history are continuously available online or in the App.
- iv) The fee of \$0.29 per order is deducted at the time of ordering and does not need to be paid separately.
- v) Balance is limited to \$200 at any given time.
- vi) The product is only available in schools that have a school or canteen provider that has implemented Spriggy Schools.

c) Excluded class of consumers

The Spriggy Schools product is not suitable for:

- i) individuals below the age of 18 years.
- ii) Parents with children in a school that has not implemented Spriggy Schools as a payment option.
- iii) Parents with children who attend school outside of Australia.

d) Consistency between target market and Likely objectives, financial situation and needs

The Spriggy Schools product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as it enables Parents to manage their kids' school payments conveniently via web and mobile devices.

3. Distribution Conditions and Restrictions

a) Distribution channels

The Spriggy Schools product is designed to be distributed online via the Spriggy Schools website www.spriggyschools.com.au.

b) Distribution conditions and restrictions

Spriggy Schools Pty Ltd has the following distribution conditions in place designed to help ensure that the Spriggy Schools product is only distributed to customers in the target market:

- i) Suitability and eligibility questions on application, to determine whether the customers are individuals over the age of 18 years who have children at a school that supports the Spriggy Schools product.
- ii) Production and distribution of materials that explain and document the key attributes of the Spriggy Schools Product;
- iii) Systems and processes that support the suitability and eligibility assessments, and the delivery of other information relevant to the customers' understanding of the target market for the Spriggy Schools product.
- iv) Controls on marketing to those outside the target market.

c) Adequacy of distribution conditions and restrictions

The targeted advertising combined with the need for Parents to successfully register will make it likely that consumers who purchase the product are in the class of consumers for which it has been designed.

4. Reviewing this Target Market Determination

We will review this Target Market Determination in accordance with the below:

Initial review	Within 6 months of the effective date.
Periodic reviews	At least every year from the initial review.
Review triggers or events	Any event or circumstances arise that would suggest the Target Market Determination is no longer appropriate. This may include (but is not limited to): <ul style="list-style-type: none"> ● a material change to the design or distribution of the Spriggy Schools product, including related documentation; ● occurrence of a significant dealing; ● distribution conditions found to be inadequate; ● change in legal or regulatory requirements; ● external events such as adverse media coverage or regulatory attention; and ● significant changes in metrics, including, but not limited to any increase in complaints relating to the appropriateness of the product for the target audience.

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

5. Reporting and monitoring this Target Market Determination

We will collect the following information from our distributors in relation to this Target Market Determination:

Complaints	Distributors will report all complaints in relation to the product(s) covered by this Target Market Determination on a monthly basis. This will include written details of the complaints.
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Review trigger	Distributors will provide [frequency] and incident-based reports in relation to any review triggers or events which occur which suggest that the Target Market Determination is no longer appropriate.
Significant dealings	Distributors will report if they become aware of a significant dealing in relation to this Target Market Determination within 10 business days.