Target Market Determination
NAB Foreign Currency Account

Determination Criteria	Description
Start date	22/08/2025
First and ongoing review period	The first review, and each ongoing review, must be completed within each consecutive 12 month period from the Start Date.
Product	**NAB Foreign Currency Account** A NAB Foreign Currency Account is a transaction account for foreign currency designed for customers who frequently make or receive payments in a foreign currency.

Target Market

Target market & product attributes	**Consumer needs and objectives**	**Product attributes**
	A person that frequently makes or receives payment in a foreign currency and needs the flexibility and control to manage foreign currency cash flow with no monthly account fee.	A transaction account that holds funds in foreign currencies with the following key attributes: • the ability to use the product to deposit funds • the ability to make day-to-day transactions • at call access to funds • no monthly account fee • banker assisted transaction fees • requirement to pay foreign currency holding fee where applicable.
	Consumer financial situation	**Product attributes**
	A person who holds foreign currency and seeking to: • transact in a foreign currency • pay for banker assisted transaction • pay foreign currency holding fee where applicable	This foreign currency transaction account: • has banker assisted transaction fees • has requirement to pay foreign currency holding fee where applicable.
Appropriateness statement	NAB has considered that the product including its key attributes is appropriate for the target market including the likely objectives, financial situation and needs of consumers in the target market.	

Distribution Conditions

Commercial compliance This condition applies to all conduct	**Condition 1** A distributor must: • hold an appropriate Australian Financial Services Licence (AFSL) or be an authorised

	representative of a AFSL holder unless an exemption applies covering the provision of financial services in respect of the product; and • if the distributor is not NAB: - comply with the terms and conditions of any relevant distribution agreement or arrangement with NAB - if applicable, comply with the terms of any licensing exemption covering the provision of financial services in respect of the product. This condition is appropriate as it ensures distributors are appropriately authorised to provide the relevant regulated financial services and will comply with the commercial terms agreed between the distributor and NAB.
General advice This condition applies to general advice (including most marketing)	**Condition 2** A distributor must only provide general advice (such as marketing) as to the product if: • a Target Market Determination (TMD) has been made and published for the product and has not been withdrawn • the distributor complies with the terms of the TMD for the product • the general advice is consistent with the consumer needs, objectives and financial situation defined in the target market for the product; and • ASIC has not issued a Product Intervention Power restricting the publication of general advice for the product by the distributor. A distributor may provide general advice (such as marketing) as to the product through public channels such as: • television, radio, the internet (including social media), billboards and physical banners, brochures and other marketing material available to the general public • advertising through comparison sites and rating agencies • NAB Branch • NAB Business Banking Centre • NAB Relationship Bankers • NAB's Call Centre • NAB's Website. This condition is appropriate as the target market is wide. It is intended that these channels may be available to persons who would not at that time qualify for the product to be issued to them in a regulated sale, for example because they are minors. This is because the issue of the product is subject to Distribution Conditions 1, 3 and 4 which will ensure that the product is only issued to persons for whom it will be appropriate.
Retail product distribution conduct (other than General Advice) These conditions apply to all retail product distribution conduct that is not general advice	**Condition 3** A distributor must only engage in retail product distribution conduct (other than general advice) if: • a TMD has been made and published for the product and has not been withdrawn • the distributor complies with the terms of the TMD for the product • ASIC has not issued a Product Intervention Power restricting the distribution of the product for the distributor; and • the distributor has complied with Condition 4. A distributor must only engage in retail product distribution conduct (other than general advice) through: • NAB Branch • NAB Business Banking Centre • NAB Relationship Bankers • NAB's Call Centre • NAB's Website. This condition is appropriate as the issuer has distributed this product using these methods, with limited risk to consumers. **Condition 4**

	A distributor must only engage in retail product distribution conduct (other than general advice) if it has identified:
	• that the distribution of the product is consistent with the needs, objectives and financial situation defined in the target market for the product
	• that the person is seeking access to a foreign currency transaction account with the following key attributes:
	  ○ has banker assisted transaction fees
	  ○ has requirement to pay foreign currency holding fee where applicable
	• the key difference between:
	  ○ the product; and
	  ○ the other separate transaction and deposit products issued by NAB.
	
	This condition is appropriate as it requires a distributor to confirm that the consumer is in the target market.

Review Triggers

Review triggers	NAB and any distributor of this product, must cease all retail product distribution conduct (except excluded conduct) in respect of this product within 10 business days of NAB identifying a review trigger unless: • NAB has determined that this TMD continues to be appropriate; or • a new TMD has been made. The events and circumstances described below will trigger a review of this TMD if NAB determines it may relate to the appropriateness of the TMD having regard to NAB's internal policies. NAB will publish notice of a review on its website.	
	Material complaints	NAB actively monitors consumer complaints and will review the appropriateness of the TMD where complaints in number or significance relate to consumer understanding of risks, key terms, conditions or features of this product.
	Product performance	NAB actively monitors product performance indicators relevant to the product and will review the appropriateness of the TMD in circumstances where: • evidence shows that consumer usage is significantly different from original issuer expectations (e.g. a different product purpose) • evidence shows that product is no longer meeting the financial situation, needs and objectives of the target market for whom the product was designed • evidence shows of substantial sales outside of the Target Market.
	Feedback from distributors	Reporting received from distributors, or consistent feedback from distributors which suggests that the target market or key product attributes may no longer be appropriate. Refer to Reporting.
	Substantial product change	NAB makes a substantial change to the product terms, conditions or key product attributes including: • adding to, removing or changing a product attribute • a substantial pricing change which impacts the consumer value proposition of the product • significant changes to a distribution channel and distribution strategy.
	Significant change to the external environment	• Regulatory or legislative environment for this product. • Economic and market conditions.
	Notification from ASIC	NAB receives a notification from ASIC requiring immediate cessation of product distribution or particular conduct in relation to the product.

	Significant dealings	Evidence that the distribution of the product or distributor conduct are significantly different to the expectations set out in the TMD.

Reporting

Reporting period	The Reporting Period for this determination is quarterly during each calendar year: • First reporting period ending on 31 March. • Second reporting period ending on 30 June. • Third reporting period ending on 30 September. • Fourth reporting period ending on 31 December.	
Reporting information	A distributor must provide the following information in writing as soon as practicable or within 10 business days after the end of the relevant reporting period.	
	Complaint information	Complaints related to the risks, key terms, conditions or key attributes of this product including: • the number of complaints • the nature and circumstances of the complaints • whether or not there has been or is likely to be consumer harm or detriment, and if so, the nature of the harm or detriment.
	Feedback from distributors	Feedback that the target market or key product attributes may no longer be appropriate and not meeting the likely needs and objectives and financial situation of the class of consumers in the target market.
	Significant dealings	If a distributor becomes aware of a significant dealing in the product or an issue with the distributor conduct, that is not consistent with the TMD, they must notify the issuer in writing as soon as practicable, and in any event within 10 business days after becoming aware.
	Other information requested by NAB	Any other information requested in writing by NAB from time to time subject to: • The request being necessary to enable NAB to meet its legal and compliance obligations; and • NAB providing at least 30 days prior notice before the end of the Reporting Period.