

TARGET MARKET DETERMINATION

A.P.V.C. LIMITED A.C.N. 093 228 141 AS RESPONSIBLE ENTITY FOR THE ACCOR VACATION CLUB ARSN 37 094 718 108

This Target Market Determination is effective from 5 October 2023.

1. What is a Target Market Determination?

This Target Market Determination (**TMD**) has been prepared by A.P.V.C. Limited (**RE, Issuer**) for the Accor Vacation Club ARSN 37 094 718 108 (**Club**) and is required under section 994B of the Corporations Act 2001 (Cth) (**Act**). APVC is the responsible entity of, and issuer of interests in, the Club.

The TMD sets out the class of consumers for whom the product, including key attributes, would likely be consistent with their likely objectives, financial situation and needs. In addition, the TMD outlines the triggers to review the target market and certain other information. It forms part of APVC's design and distribution arrangements for the Club.

Please refer to the Product Disclosure Statement and any supplementary documents for information on the product, available at www.accorvacationclub.com.au/about-the-club/product-disclosure-statement, before making a decision whether to buy the product. This TMD is not intended as personal and/or financial advice and does not take into account any person's individual objectives, financial situation or needs.

2. Class of consumers that comprises the target market for this product

Membership in the Club is likely to be suitable for those looking to acquire an interest in a holiday and lifestyle program that allows Member families to own, rather than rent, future holidays at their favourite holiday destinations across Australia, New Zealand and Indonesia. Such consumers would be seeking to holiday on a regular basis for the long term in apartment-style accommodation in resorts in Australia, New Zealand and Indonesia; and have the financial capacity to purchase a membership and pay the ongoing fees of membership.

Consumers for whom this product is likely to be appropriate are those who meet the following criteria:

- be a permanent resident of Australia or New Zealand;
- be currently employed and/or meet the following income requirements:
 - have a minimum combined household income of \$140,000 for people who are married, in a life partnership or a de facto relationship; or
 - a personal income of \$140,000, if single;
- be competent in verbal and written English; and
- be either:

- married or in a life partnership, with one partner between the ages of 28 and 65 years; or
- a single person between the ages of 28 and 65 years.

Generally, a consumer is unlikely to be in the target market for the product if they:

- are over the age of 65 at the time of acquiring the interest in the Club;
- are looking for a holiday product other than apartment style accommodation i.e. caravanning, camping, motels, cruises
- are seeking to generate a financial return from acquiring an interest in the Club including if they decide to sell their interest in the Club; or
- do not intend to hold an interest in the Club for the long-term.

a. Product description and key attributes

This product, being a Membership in the Club, provides Members and their families access to holiday accommodation at twenty-four (24) different Club apartments across a range of holiday destinations across Australia, New Zealand and Indonesia.

Members of the Club receive an annual allocation of points to be used for their holiday stays. The amount of points allocated to a member will depend on the level of Membership. The number of points required to stay at a Club apartment will depend on the season, length of the holiday, and the size of the apartment required. Members can refer to the PDS to calculate the number of points required for each stay. In addition to the purchase price of a Membership, the amount of which depends on the level of Membership the consumer acquires, members pay an ongoing club fee annually to cover the cost of operating the Club and maintaining Club properties.

Membership in the Club may also provide access to a number of personal benefits, such as access to select properties within the Accor network of over 5,200 hotels, resorts and apartments in over 110 countries.

Membership in the Club will continue until 2080 (unless extended in accordance with the Club's constitution).

b. How the Club is consistent with the objectives, financial situation, and needs of the target market

The annual allocation of points to members can be used to book holiday stays in holiday destinations across Australia, New Zealand and Indonesia, and, for members with personal benefits, to access the Accor network of over 5,200 hotels, resorts and apartments in over 110 countries.

Members have a beneficial interest in the Club assets and are owners of the Club apartments and, upon purchasing a Membership, have the right to an annual allocation of points and access to holiday accommodation for the life of the Club, subject to payment of Club fees and, if applicable, other membership fees.

APVC considers consumers who meet the criteria set out in section 2 will likely have the financial capability to afford a Membership and ongoing fees, have the language skills to understand how the Club operates and maximise the benefits of their Membership, and be at an age to enjoy the type of apartments and resorts available through the Club and benefit from the long-term nature of the Club,

c. Appropriateness

The Issuer has based the TMD on an analysis of historical data, including member usage and feedback, key terms and features and attributes of the product, and has determined that the key terms and features and attributes of the product as identified in section 2a are consistent with the common objectives, financial situation and needs of the identified class of consumers as identified in section 2.

3. Distribution of this Product

a. Distribution channels

This product is designed to be distributed by Authorised Representatives of the Issuer. This is because the Issuer’s Authorised Representatives receive training on the benefits, features, attributes and risks of the product and meet ASIC’s knowledge and skill requirements to provide personal advice on the product to retail clients. The Issuer considers that a distributor must have a thorough understanding of the Club in order to distribute the product to consumers.

b. Distribution conditions

This product should only be distributed to a consumer who is provided personal advice by an Authorised Representative of the Issuer. In providing personal advice, the Authorised Representative is required to act in the best interests of the consumer and, in doing so, identifies the consumer’s objectives, financial situation and needs.

c. Adequacy of distribution conditions and restrictions

The Issuer’s considers distribution of the product via its Authorised Representatives and the requirement for a consumer to receive personal advice from an Authorised Representative is likely to ensure the consumer is in the target market or that the product is otherwise appropriate for the consumer.

4. Reviewing this Target Market Determination

The TMD must be regularly monitored and reviewed. We will review this TMD as follows:

Initial Review	The initial review of this TMD will be within three (3) months of the effective date.
Periodic Reviews	Other than in the event of an occurrence of a review trigger, event or circumstance that would reasonably suggest that the TMD is no longer

	appropriate, the TMD must be reviewed at least annually.
Review Triggers or Events	<p>The TMD must be reviewed when:</p> <ul style="list-style-type: none"> - a review trigger for the TMD has occurred; or - another event or circumstance has occurred that would reasonably suggest that the determination is no longer appropriate. <p>The Issuer has assessed the events that reasonably suggest the TMD is no longer appropriate and must be reviewed. These events are referred to as 'review triggers'. These review triggers may include:</p> <ul style="list-style-type: none"> - complaints from members which indicate the product is not meeting their needs or expectations or does not operate how the consumer believed it would; - material changes to obligations, the business or the environment in which the Issuer and/or distributor operate; - material changes to the product; - material changes to the Club; - material changes to legislation, regulation and/or the time-share and/or tourism industry; - occurrence of a significant dealing; and - distribution conditions are found to be inadequate. <p>Where a review trigger has occurred, this TMD will be reviewed within 10 business days.</p>

5. Reporting and monitoring this Target Market Determination

Distributors must provide the following information in relation to this TMD.

Complaints	A distributor must notify the Issuer of all complaints in relation to the product within one (1) business day of each presentation on the Club delivered by the distributor to consumers. This will include written details of the complaint.
Other information	<p>A distributor must provide the Issuer with details of any feedback received from:</p> <ul style="list-style-type: none"> (a) a consumer who attends a presentation on the Club as to why the consumer did not wish to purchase the product; and (b) a consumer to whom the distributor provided a statement of advice recommending they purchase the product and who did not proceed with such recommendation, as to why the consumer did not purchase the product, within one (1) business day of each

	presentation on the Club delivered by the distributor to consumers at which such feedback was provided.
Significant Dealings	If a distributor becomes aware of a significant dealing in the product that is not consistent with the TMD, it must notify the Issuer as soon as practicable (within 10 business days), in order for the Issuer to collect, monitor and review such dealings to detect any trends in distribution of the product and how these dealings deviate from the TMD.