
Target Market Determination – Contracts for Difference

This document provides guidance in relation to Target Market Determinations (TMD) for the purposes of the Design and Distribution Obligations (DDO) under the Corporations Act 2001 (Cth). It is a matter for each user of this guidance to consider their individual situation and to comply with the new regime.

Important Notice

This Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). It sets out the class of consumers for whom the product, including its 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 STARTRADER Prime Global Pty Ltd's design and distribution arrangements for the product.

This document is **not** a product disclosure statement 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 Product Disclosure Statement (PDS) for Contracts for Difference before making a decision on whether to buy this product.

Target Market Summary

This product is likely to be appropriate for a retail consumer who has a short investment timeframe, very high and high risk/return profile

Issuer identifiers

Issuer	STARTRADER Prime Global Pty Ltd ("STARTRADER")
Issuer ABN	65 156 005 668
Issuer AFSL	421210
Date TMD approved	30 July 2025
TMD Version	3
<i>TMD Status</i>	Current

Financial Products This TMD Applies

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This TMD applies to OTC Derivatives in the form of contracts for difference (“CFDs”) and margin foreign exchange (“Margin FX”) contracts. Collectively, these are referred to as CFDs in this TMD.

Description of Target Market

This part is required under section 994B(5)(b) of the Act.

TMD indicator key

The Consumer Attributes for which the product is likely to be appropriate have been assessed using appropriate colour labels:

In target market	Not considered in target market
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Generally, a consumer is unlikely to be in the target market for the product if **all** of their Consumer Attributes correspond to **green** labels in relation to CFDs:

CONSUMER ATTRIBUTES	IN TARGET MARKET	PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES
Consumer's investment objectives	<ul style="list-style-type: none"> Speculation, hedging or gaining exposure to price movement The consumer aims to invest in a product that enables speculation on market price fluctuations, hedging of other investment positions, or gaining exposure to specific markets without directly owning the underlying asset. 	<p>CFDs are suited to traders who are seeking to speculate, hedge, or gain exposure to price movements in the global markets. However, they are not designed for those looking to preserve capital, receive guaranteed returns, or earn a regular income.</p> <p>CFDs are a sophisticated financial instrument that provides our consumers the opportunity to speculate, hedge or gain exposure to price movements in a range of financial markets, including stocks, commodities, and indices, without having to own the underlying asset directly.</p> <p>Key Attributes:</p> <ol style="list-style-type: none"> Speculation: CFDs are ideally suited to clients seeking to speculate on market movements. This product allows consumers to potentially profit from both rising and falling markets, providing another financial option compared to traditional trading instruments. Hedging: Our CFDs can also be used for hedging purposes. For example, if you hold an existing portfolio of assets, you can use CFDs to offset potential losses in your physical investments should markets move against you. Price Movement Exposure: CFDs provide a cost-effective way for traders to gain broad market exposure with a relatively smaller amount of capital. This is due to the leverage offered, where a proportion of margin deposit can control a larger total

		contract value.
Consumer's investment timeframe	<ul style="list-style-type: none"> • Short-term 	Suitable for Short-term Trading: Our CFDs are specifically tailored for short-term trading. Due to the nature of leverage and margin trading, CFDs are a suitable instrument for short-term trading, where the objective is to benefit from short-term price fluctuations.
Consumer's risk tolerance	<ul style="list-style-type: none"> • High to Very High The consumer is higher/very high risk in nature and can accept higher potential losses in order to target a higher return/seek to maximise returns. The consumer seeks exposure to growth assets and alternative assets 	<p>Our CFDs are more suitable for investors who have a high to very high risk tolerance and are comfortable with the possibility of substantial losses.</p> <p>Key Attributes: Suitable for consumers with High to Very High risk tolerance: Our CFDs are best suited for those with a high to very high risk tolerance. Given the leveraged nature of CFDs, the potential for both profit and loss are magnified. Investors should be prepared for the possibility of losing the entire amount of their investment, especially if the market moves significantly against their position.</p>
Consumer's ability to bear losses	<ul style="list-style-type: none"> • All deposit amount with STARTRADER 	Our CFDs are suitable for clients who understand and can bear the potential loss of all their deposited funds. Given the leveraged nature of CFDs, the potential for losses can equal the initial deposit
Source of fund	<ul style="list-style-type: none"> • Other non-essential source of fund 	<p>Our CFD products are tailored only for individuals who trade using non-essential capital that they can afford to lose.</p> <p>Key Attributes: Other Non-Essential Sources of Funds: Our CFDs are more appropriate for traders who are using non-essential sources of funds. These could be funds specifically set aside for speculative trading activities or risk capital that won't impact the individual's lifestyle or financial wellbeing if lost.</p>
Age	<ul style="list-style-type: none"> • Above 18 and Under 75 years old 	<p>Our CFDs are designed only for individuals between the ages of 18 and 75, who possess the financial capability, mental sharpness, and risk tolerance necessary for trading such high-risk, complex financial instruments</p> <p>Key Attributes: Suitable for consumers between 18-75 years of age: Our CFDs are targeted towards individuals who fall within the age range of 18-75. During this period, individuals are</p>

		generally either part of the active workforce or have access to savings or other financial resources, and therefore might have the financial capacity to absorb losses, if necessary. Furthermore, they are more likely to have the required mental acuity and risk tolerance to understand and handle the complexities and risks associated with trading these financial instruments.
Income or Saving	<ul style="list-style-type: none"> Income or Saving Suitable for CFD Trading 	<p>Our CFDs are targeted towards individuals with income or saving levels that provide sufficient financial stability to handle potential losses associated with these high-risk instruments.</p> <p>Key attributes:</p> <p>Income or Saving Suitable for CFD Trading: Our CFDs are designed for individuals who have adequate income or saving levels to support higher-risk investment activities. These individuals are more likely to have discretionary income or saving that can be allocated to trading OTC CFDs and possess the financial capacity to absorb potential losses that might occur during trading without experiencing significant financial distress.</p>
Knowledge and Experience	<ul style="list-style-type: none"> Sufficient Knowledge and Experience 	<p>Our CFDs are targeted towards individuals with sufficient knowledge and experience to understand the complexity and risks of these products, which require a good understanding of financial markets and the ability to make informed decisions.</p> <p>Key attributes:</p> <p>Sufficient Knowledge and Experience: Our CFDs are designed for individuals who possess adequate knowledge and experience in financial markets. This level of understanding typically equips individuals with a basic comprehension of financial concepts, critical thinking skills, and the ability to comprehend the complexities and risks associated with such financial instruments.</p>

Generally, a consumer is unlikely to be in the target market for the product if **one or more** of their Consumer Attributes correspond to a **red** label in relation to CFDs:

CONSUMER ATTRIBUTES	NOT CONSIDERED IN TARGET MARKET	PRODUCT DESCRIPTION INCLUDING KEY ATTRIBUTES
Consumer's	<ul style="list-style-type: none"> Capital Preservation 	CFDs are suited to traders who are seeking to speculate, hedge, or gain exposure to price

investment objectives	<p>The consumer seeks to invest in a product to reduce volatility and minimise loss in a market down-turn.</p> <ul style="list-style-type: none"> • Capital Guaranteed The consumer seeks for a guarantee or protection against capital loss whilst still seeking the potential for capital growth • Regular Income The consumer seeks to invest in a product designed to distribute regular and/or tax-effective income • High Capital Growth The consumer seeks to invest in a product designed to generate high capital return 	<p>movements in the global markets. However, they are not designed for those looking to preserve capital, receive guaranteed returns, high capital growth, or earn a regular income.</p> <p>Key Attributes:</p> <ol style="list-style-type: none"> 1. Not for High Capital Growth: As this product does carry a high level of risk due to leverage, may be unsuitable for high capital growth because potential losses can reach the entire deposits. 2. Not for Capital Preservation or Guarantee: This product is not suitable for those whose primary investment objective is capital preservation or guaranteed returns. Trading CFDs involves substantial risk and there is a chance consumers could lose the entire deposit. 3. Not for Regular Income: Our CFDs are not designed to provide a regular income. They are more suited to short-term trading strategies and can be subject to significant price volatility. This can lead to both profits and losses.
Consumer's investment timeframe	<ul style="list-style-type: none"> • Medium or Long-term 	<p>Key Attributes:</p> <p>Not for Long-term Investing: CFDs are generally not suitable for medium or long-term investing. They do not provide ownership of the underlying asset and typically involve ongoing financing costs, which can make holding positions over the medium or long term expensive. Therefore, those with a medium or long-term investment horizon would likely not find CFDs to be the most cost-effective or appropriate instrument for their needs.</p>
Consumer's risk tolerance	<ul style="list-style-type: none"> • Medium The consumer is moderate or medium risk in nature, seeking to minimise potential losses and comfortable with a moderate return <p>The consumer seeks exposure to a balance of growth assets, alternative assets and defensive assets</p> <ul style="list-style-type: none"> • Low The consumer is conservative or low risk in nature, seeks to minimise potential losses and is 	<p>Our CFDs are more suitable for investors who have a high to very high risk tolerance and are comfortable with the possibility of substantial losses. Those with medium risk tolerance should carefully consider their comfort with potentially significant losses before deciding to trade in CFDs. Meanwhile, this product is generally not appropriate for individuals with a low risk tolerance.</p> <p>Key Attributes:</p> <p>Not suitable for consumers with Medium or Low Risk Tolerance: CFDs are not suitable for those with a medium or low risk tolerance. The potential for losses to the entire deposits, coupled with the complexity of the product, makes it unsuitable for conservative investors seeking to preserve capital or secure guaranteed returns.</p>

	<p>comfortable with a low target return profile.</p> <p>The consumer seeks exposure to defensive assets</p>	
Consumer's ability to bear losses	<ul style="list-style-type: none"> • Less than the deposit amount with STARTRADER 	<p>CFDs are not appropriate for those who cannot afford to lose their entire deposit with us. The high degree of leverage associated with CFDs can result in rapid and substantial losses.</p>
Source of fund	<ul style="list-style-type: none"> • For living expenses, saving for essential expenses during retirement 	<p>Our CFD products are tailored only for individuals who trade using non-essential capital that they can afford to lose. They are not designed for individuals who used essential income or savings as a source of funds.</p> <p>Key Attributes:</p> <p>Not suitable for Living Expenses, Savings for Essential Expenses During Retirement: Our CFDs are not suitable for individuals who plan to use income meant for living expenses or retirement savings intended for essential expenses. Given the high-risk nature of CFDs, it's not advisable to use funds earmarked for essential needs or essential expenses during retirement. The potential for losses to the entire investment means that traders should not risk money they cannot afford to lose.</p>
Age	<ul style="list-style-type: none"> • Under 18 or Above 75 years old 	<p>Our CFDs are designed only for individuals between the ages of 18 and 75, who possess the financial capability, mental sharpness, and risk tolerance necessary for trading such high-risk, complex financial instruments</p> <p>Key Attributes:</p> <p>Not suitable for consumers under 18 or over 75 of age: Our CFDs are not targeted towards individuals under the age of 18 or over the age of 75. Our CFD products are not suitable for minors (those under 18). As for those over 75, considering the potential risk and stress associated with the volatility of these instruments, they may not be suitable due to possible age-related impairments and generally lower risk tolerance at this life stage.</p>

Income or saving	<ul style="list-style-type: none"> Income And Saving Not Suitable for CFD Trading 	<p>Our CFDs are targeted towards individuals with income and saving levels that provide sufficient financial stability to handle potential losses associated with these high-risk instruments.</p> <p>Key attributes:</p> <p>Income and Saving Not Suitable for CFD Trading: Individuals with insufficient income and saving are not considered to be in our target market for CFDs. The financial risk involved with these instruments can be substantial, as losses can exceed initial deposits. Thus, trading these products could pose a significant financial burden for those with limited income and saving, potentially exacerbating financial hardship.</p>
Knowledge and Experience	<ul style="list-style-type: none"> Insufficient Knowledge and Experience 	<p>Our CFDs are targeted towards individuals with sufficient knowledge and experience to understand the complexity and risks of these products, which require a good understanding of financial markets and the ability to make informed decisions.</p> <p>Key attributes:</p> <p>Insufficient Knowledge and Experience: Individuals without adequate knowledge and experience are not in our target market for OTC CFDs. The complexity and risk associated with these financial instruments require a certain level of understanding that comes from sufficient education, training, or practical experience in financial markets. Without this foundation, trading in OTC CFDs could lead to misunderstandings and potentially significant financial losses.</p>
Financial/ Personal Vulnerability	<p>Consumers subject any of the following situation and/or similar conditions:</p> <ul style="list-style-type: none"> Financial hardship Bankruptcy Financial abuse 	<p>CFDs are not appropriate for individuals in financially or personally vulnerable situations, as the potential for significant losses could exacerbate these vulnerabilities and negatively affect the consumer outcomes.</p> <ol style="list-style-type: none"> Financial Hardship and Bankruptcy: Individuals facing financial hardship or bankruptcy are advised not to engage in OTC CFD trading. These situations suggest a

	<ul style="list-style-type: none"> • Other detrimental financial circumstances • Age-related impairment; • Mental or other forms of serious illness affecting capacity; • Addiction • Other detrimental personal circumstances 	<p>lack of disposable income and financial stability required to absorb potential losses, which can reach the entire deposits or balances in the volatile markets.</p> <p>2. Financial Abuse and Other Detrimental Financial Circumstances: If a person is a victim of financial abuse or in other detrimental financial circumstances, trading in CFDs is not advised. The financial risk associated with these instruments could exacerbate an already precarious financial situation and/or negatively affect the consumer outcomes.</p> <p>3. Age-related Impairment, Mental Illness or Serious Illness affecting Capacity: Trading CFDs requires a clear understanding of financial markets and the risks involved. Age-related impairment or any mental or serious illness affecting a person's capacity to make informed decisions could negatively impact their ability to trade these products effectively and responsibly.</p> <p>4. Addiction: Individuals subject to addiction, including gambling addiction and/or other compulsive addiction, are not suitable consumers for trading CFDs. The speculative and potentially repetitive nature of these products and the possibility of significant losses could exacerbate addictive behaviours and/or negatively affect the consumer outcomes.</p> <p>Other Detrimental Personal Circumstances: Any other personal circumstances that could impact a person's ability to make informed, rational financial decisions would also make the consumers unsuitable for trading CFDs. These situations could include personal trauma or any other circumstances that might cloud judgement or decision-making abilities.</p>
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Appropriateness

The Issuer has assessed the product and formed the view that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described above, as the features of this product in Column 3 of the table above are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Distribution conditions/restrictions

Distribution Condition	Distribution Condition Rationale	<i>applicable</i>
There are no distribution conditions		<input type="checkbox"/>

Only suitable for distribution to consumers who have received personal advice		<input type="checkbox"/>
Other	<p>Distributor must use advertising materials, customer service prompts and all other materials that are consistent with <u>general advice only</u>. Distributors must not seek to ascertain/appeal to each customer's individual needs and requirements in contravention of general advice authorisations.</p> <p>General advice warnings must be issued by distributors in all communications with customers including advertisements and websites and must note that neither the issuer nor the distributor have considered the customer's personal objectives, financial situation and/or needs with this product. Furthermore, it should be added that customers should consider the appropriateness of the product with their personal needs and consider the relevant disclosure documents before making any decision.</p> <p>Given the high-risk nature of these products, distributors will not undertake mass market advertising to a wide range of consumers other than educational information. All marketing materials must be specific to the above TMD and must emphasise that these products are of limited suitability. This is particularly crucial for distributors seeking to advertise online and/or via social media channels. In addition, all requirements under the ASIC Product Intervention Order must be complied with.</p> <p>No Distributor may release marketing materials without obtaining our prior written consent. Any new marketing campaign shall be reviewed and approved by the product issuer prior to its publication, to check that it does not contain elements which may attract potential consumers outside of the intended target market.</p> <p>In limited instances and with specific products, the Distributor will be obliged under the AML/CTF Act to undergo Know-Your-Customer (KYC) procedures. Distributors must not distribute these products to customers who are suspected of engaging in illicit activity and/or provide false or misleading information.</p>	X

Review triggers

This part is required under section 994B(5)(d) of the Act.
Material change to key attributes, investment objective and/or fees.
Determination by the issuer of an ASIC reportable Significant Dealing
Material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the product or distribution of the product.
Where we have detected significant issues with the distribution of our CFDs through our monitoring of our own day-to-day activities, or the monitoring and supervision of our Distributors
The use of Product Intervention Powers, regulator orders or directions that affects the product.

Mandatory review periods

This part is required under section 994B(5)(e) and (f) of the Act.

Review period	Timeline
Initial review	
Subsequent review	On each anniversary of the first review date

Distributor reporting requirements

This part is required under section 994B(5)(g) and (h) of the Act.

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Act) relating to the product design, product availability and distribution. The distributor should provide all the content of the complaint, having regard to privacy. The distributor will need to specify a reporting period for reporting information about the number of complaints about the product.	As soon as practicable or within 10 business days following the end of the relevant reporting period.	All distributors
Significant dealing outside of target market, under s994F(6) of the Act.	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	All distributors
Other significant data occurred or received during the	Within 10 business days of the end of each calendar	All distributors

reporting period: <ul style="list-style-type: none"> • Consumer feedback, including regarding performance of the product • Requests for information that the Distributor has received from consumers • Percentage of sales to consumers who are not in the target market Volume of sales	semi-annual – 30 June and 31 December, each year.	
To the extent a distributor is aware of dealings outside the target market these should be reported to the issuer, including reason why acquisition is outside of target market, and whether acquisition occurred under personal advice.	As soon as practicable or within 10 business days following the reporting period.	All distributors