

Target Market Determination (TMD)

Contracts for Difference

<p>Issuer</p>	<p>Gleneagle Securities (Aust) Pty Limited trading as FXTRADING.COM, ABN 58 136 930 526, AFSL 337985 (referred to as “FXTRADING.com” “us”, “our” or “we”) operates a contracts for difference (“CFDs”) business.</p> <p>FXTRADING.com is a product issuer and issues CFDs to clients, including retail clients. The design and distribution obligations set out in Part 7.8A of the <i>Corporations Act 2001</i> (“DD Obligations”) have applied to the issue and distribution of CFDs to retail clients (“Consumers”) since 5 October 2021.</p>
<p>Product</p>	<p>Contracts for Difference (“CFDs”).</p>
<p>Date of TMD</p>	<p>14/07/2025</p>
<p>Overview of this document</p>	<p>The DD Obligations aim to assist Consumers to obtain appropriate financial products by requiring product issuers and distributors to have a consumer-centric approach to the design and distribution of financial products. The purpose of this target market determination (“TMD”) is to describe the target market for our CFDs, and to address the DD Obligations that apply to TMDs.</p> <p>If you are a retail client, you should refer to the relevant product disclosure statement (“PDS”) before deciding whether to acquire or continue to hold the relevant product. You can get a copy of the relevant PDS from our website www.fxtrading.com. You should not base any decision to trade on the contents of this TMD and this TMD is not suitable for the purpose of deciding whether to open a CFD trading account or trade in CFDs.</p>
<p>Overview of CFDs</p>	<p>CFDs are complex and leveraged financial products which enable Consumers to trade on the price movement of underlying financial assets such as foreign exchange currency pairs, indices, cryptocurrencies, shares and commodities. CFDs involve a variety of fees or charges, including spreads, account charges, overnight fees and commissions, which may make them unsuitable for some Consumers. Such fees are notified to Consumers before they purchase CFDs.</p> <p>A CFD is an agreement to exchange the difference in the value of a particular underlying asset from the time the contract is opened until the time at which it's closed.</p> <p>With a CFD, Consumers never own the underlying asset they have chosen to trade, but they can still benefit if the market moves in their favour or make a loss should the markets move against them.</p> <p>CFDs are short term speculative investments and are not generally suitable for Consumers looking to make longer term investments.</p> <p>There are several reasons why Consumers may trade CFDs:</p> <ul style="list-style-type: none"> • to speculate on the rising or falling prices or levels of underlying assets. A Consumer can take long or short positions on a particular underlying asset depending on whether they think prices or levels will go up or down; • to trade without buying or selling the actual underlying asset (e.g. a physical share, currency pair or commodity); • to trade on margin. A Consumer only needs to deposit a small percentage of the full value of the trade as margin in order to open a position; and/or • to reduce risk by hedging against an existing investment (e.g. acquiring a CFD over shares the Consumer already holds). <p>CFDs are subject to significant risks. This includes, but is not limited to:</p> <ul style="list-style-type: none"> • Leverage: Consumers typically pay only a fraction of the full value of the CFD position as Margin. Due to the change in the market for the underlying asset, margin requirements can change rapidly. • Losses: Losses on CFDs can exceed the initial Margin paid. Negative Balance Protection ensures Consumers cannot lose more than their account balance. • Market Volatility: Financial markets are highly volatile, leading to rapid price changes that can widen spreads and complicate price execution. • Margining: Consumers must maintain sufficient Margin to keep CFD positions open. Failure to do so may result in automatic position closures.

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	<ul style="list-style-type: none"> • Counterparty risk: Consumers deal with FXTRADING.com as the counterparty to every transaction and are therefore exposed to the financial and business risk of trading with us.
Financial products issued by us	<p>We issue CFDs in respect of the following underlying assets:</p> <ul style="list-style-type: none"> • Currency pairs • Crypto assets • Shares • Commodities including spot precious metals and energy • Indices, including stock market indices
Target market	<p>The target market for our CFDs includes the following classes of Consumers, being consumers who satisfy each of the following criteria (and meet the additional criteria set out below):</p> <ul style="list-style-type: none"> • Consumers above the age of 18 and below the age of 70; • Consumers who can accept losses that can be as great as the sum of their deposits; • Consumers who have the requisite knowledge and experience for trading CFDs as assessed by FXTRADING.com Client Onboarding Questions and Knowledge Test; • Consumers who have high investment risk appetites; • Consumers with a short term investment horizon; • Consumers who reside in Australia • Consumers which are employed, retired or students; • Consumers who are not in financial hardship or going through bankruptcy; • Consumers who wish to trade using savings, income or cash that the Consumer does not rely on for living expenses • Consumers who do not primarily derive their income from social security and/or borrowings • Consumers who are not seeking regular or otherwise predictable guaranteed returns on their CFD trading; <p>Those consumers who satisfy the above criteria and wish to trade CFDs for investment purposes, including for one or more of the following purposes:</p> <ul style="list-style-type: none"> • speculative trading; • hedging (including hedging exposure to underlying assets and hedging positions taken in relation to other CFDs); and • gaining exposure to price movements of the underlying assets, including where exposure to such underlying assets may not be otherwise as readily available, or where such exposure is required at short notice., <p>are in the target market for FXTRADING.com's CFDs.</p>
Consumers for whom CFDs are unsuitable	<p>Consumers who are in any of the categories below are not in the target market for our CFDs:</p> <ul style="list-style-type: none"> • Consumers who are below the age of 18 and 70 years or older; • Consumers who reside outside Australia; • Consumers who are in financial hardship or going through bankruptcy; • Consumers who do not have the ability and willingness to lose the sum of their deposits; • Consumers who are seeking capital protection or stability; • Consumers who have low levels of literacy or numeracy being financial and technological; • Consumers who wish to trade using savings, income or cash that the Consumer relies on for living expenses; • Consumers who are seeking regular or otherwise predictable returns on their investments; • Consumers who do not have the requisite knowledge or experience for trading CFDs;

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	<ul style="list-style-type: none"> • Consumers who primarily derive their income from social security and/or borrowings; • Consumers who have a low or medium tolerance to risk; or • vulnerable Consumers, including Consumers who are vulnerable for any of the following reasons: <ul style="list-style-type: none"> • elderly or suffering an age-related impairment; • suffering from elder or financial abuse; • job loss; • suffering from mental or other forms of serious illness affecting capacity; • suffering from any form of addiction; • any other personal or financial circumstances causing significant detriment.
<p>Distribution Conditions</p>	<p>Our CFDs are distributed by FXTRADING.com.</p> <p>We will take reasonable steps to ensure that we distribute the financial product to the identified target market. To ensure that the distribution strategy is consistent with the identified target market, we have several processes in place to ensure that the Consumers who are potential clients fall within the identified target market. Our processes encompass a robust set of client qualification controls, ongoing monitoring of our existing client base and stringent marketing measures designed to engage Consumers who are likely to fall within our identified target market.</p> <p>Additionally, we provide comprehensive compliance training to our staff.</p> <p>We also undertake an assessment of each Consumer's knowledge of trading in CFDs, prior to approving and distributing our CFDs to them. Only Consumers who have the requisite knowledge to trade in CFDs as assessed by FXTRADING.com will be permitted to open an account and trade with us.</p>
<p>Periodic reviews</p>	<p>FXTRADING.com will perform period reviews of this TMD as follows:</p> <ul style="list-style-type: none"> • First review: within one year of the commencement date of this TMD. • Subsequent Reviews: on each anniversary of the first review date.
<p>Review Triggers</p>	<p>We will also review the TMD where the following triggers occur:</p> <ul style="list-style-type: none"> • Where there are significant dealings (issuing of CFDs) in FXTRADING.com's CFDs, which are not consistent with the target market for this TMD. This trigger occurs where significant distribution is occurring outside of the target market, and does not refer to any one particular dealing in CFDs; • Where there have been material changes to the CFD product as a result of new or amended functionality, whereby the key attributes of CFDs are no longer consistent with the likely objectives, financial situation and needs of Consumers in the target market; • Where there are material changes to the law or regulations applicable to CFDs affecting the issuance, distribution or operation of CFDs; • Where we have received relevant complaints or noted any relevant complaint trends; • Where we have detected significant issues with the distribution of our CFDs through our monitoring of our own day-to-day activities, • any other events or circumstances that would materially change a factor taken into account in making this TMD.
	<p>As part of the process of monitoring and reviewing the TMD to determine whether it is still appropriate, we collect the following information on a quarterly basis (subject to where no reporting is required, based on the particular reporting requirements and conditions set out below), within 10 business days of the end of each calendar quarter – 31 March, 30 June, 30 September and 31 December, each year</p>

Distributor Information collecting and reporting requirements	<p>Complaints data</p> <ul style="list-style-type: none">Information about the complaints received, including the number of complaints received (but only where we received complaints in relation to the product during the reporting period). <p>Other data</p> <ul style="list-style-type: none">Consumer feedback, including regarding performance of the product (but only where such feedback was received during the reporting period);requests for information that we have received from Consumers (but only where such requests were received during the reporting period);percentage of sales to Consumers who are not in the target market (but only where such sales occurred during the reporting period);volume of sales (but only where such sales occurred during the reporting period); andweb analytics.
Amendments	We reserve the right to amend the TMD at any time if such amendment is needed as a result of any changes to the law or regulations, regulatory guidance or for any reason we consider as a proper reason to amend the TMD.
Contact	<p>For more information about our TMD, please contact us:</p> <p>Mail: Level 27, 25 Bligh Street, Sydney NSW 2000, Australia Phone: + 61 2 8039 7366 Email: service@fxtrading.com Web: fxtrading.com</p>