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# **Target Market Determination**

Contracts for Difference (CFDs)  
Cryptocurrencies

## Introduction

Focus Markets Pty Ltd ("**Focus**") trading as Place a Trade Group ("Place a Trade", "we" or "us") operates a contracts for difference (**CFDs**) business. Place a Trade 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 *Corporations Act 2001* (**DD Obligations**) apply to the issue and distribution of CFDs to retail clients (**Consumers**) from 5 October 2021.

We are authorised and regulated by the Australian Securities and Investments Commission (ASIC), with licence number 391441 and registered office located at Level 35, Rialto South Tower, 525 Collins Street, Melbourne, 3000, Victoria, Australia.

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 of Consumers for our CFDs, and to address the DD Obligations that apply to TMDs.

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.

You should not base any decision to trade on the contents of this TMD, and this document is not suitable for the purpose of deciding whether to open a CFDs trading account or trade in CFDs.

## Financial products issued by us

CFDs are complex and leveraged financial products, which are traded over-the-counter (OTC) and not through a regulated market. CFDs are agreements to exchange the difference in the value of a particular underlying asset. This allows Consumers to speculate on rising or falling prices of an underlying asset.

### We issue CFDs in respect of the following underlying assets:

- Currency Pairs (FX);
- Commodities, including precious metals;
- Indices, including stock market indices;
- Cryptoassets; and
- Stocks.

This TMD has been prepared specifically in relation to our cryptocurrency CFDs. We have issued separate TMDs in respect of each of our other CFD offerings.

## The Target Market

**The target market for our CFDs include the following classes of Consumers:**

**Consumers who satisfy each of the following criteria:**

- Consumers above the age of 18;
- Consumers who have the requisite knowledge for the purposes of trading in CFDs;
- Consumers who can accept losses that can be as great as the sum of their deposits;
- Consumers who have high investment risk appetites;
- Consumers with a short-term investment horizon.

**For those Consumers who satisfy the above criteria**

Those Consumers who satisfy the above criteria and wish to trade CFDs for investment purposes, including for one or more of the following purposes:

- 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 cryptocurrencies), including where exposure to such underlying assets may not be otherwise as readily available, or where such exposure is required at short notice.

## Target market – criteria, scope and key attributes

Further details regarding Place a Trade's target market for CFDs trading is set out below.

Criteria	Scope and key attributes
<b>Client type</b>	<p>Retail clients.</p> <p>This target market determination does not apply to wholesale clients, including sophisticated investors and professional investors.</p>
<b>Knowledge and experience</b>	<p>Only clients who have the requisite knowledge and experience to trade in CFDs, as assessed by Place a Trade.</p> <p>Place a Trade undertakes assessment of the Consumer's experience and knowledge trading in CFDs prior to approving and distributing the products to the client.</p>
<b>Ability to bear losses</b>	<p>Clients who are prepared to lose amounts that can be as great as the sum of their total deposits. (Note: Place a Trade operates negative balance protection on all Retail accounts; negative balances will be returned to zero and we will waive our right to claim the deficit).</p>
<b>Tolerance to risk</b>	<p>CFDs are suitable for clients with high investment risk tolerance.</p> <p>Please note that there are particular risks associated with trading CFDs over cryptocurrencies. These include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Market Volatility - because cryptocurrency prices can be extremely volatile, they are considered one of the most high-risk assets to trade;</li> <li>• Significant changes or gaps in prices over a weekend, a major news event, or the release of macroeconomic data;</li> <li>• A previously tested strategy failing to perform in the same way, resulting in significant losses;</li> <li>• Nature of leverage – using leverage can lead to significant losses (including your entire deposit and any previously accrued profits) if the market moves against you;</li> <li>• Magnified losses - When trading with leverage, profits or losses can far outweigh the margin amount used to open a position as they are calculated based on the full position size, not just your margin. (Note: Because retail client accounts have negative balance protection, losses are limited to the value of the funds in your account).</li> </ul>
<b>Client needs</b>	<p>Our CFDs and their key attributes are likely to be consistent with the likely objectives, financial situation and needs of those Consumers who:</p> <ul style="list-style-type: none"> <li>• have a short-term investment horizon;</li> </ul>

- wish to trade in CFDs, including for speculative or hedging purposes, wishing to gain exposure to price movements of the relevant underlying assets (including cryptocurrencies);
- have a high investment risk tolerance; and
- can afford to bear losses.

Our CFDs are designed to be suitable only for Consumers with the likely objectives, financial situation and needs described above. This is because our CFDs (and CFDs generally) are highly leveraged and volatile, and expected returns may be positive or negative.

**Our products are not compatible** with the needs of clients who:

- are seeking capital protection or stability;
  - are risk-averse;
  - are seeking regular or otherwise predictable returns on their investments;
  - cannot afford to bear losses;
  - are vulnerable clients as described below.
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## Consumers for whom CFDs are unsuitable

### CFDs are generally unsuitable for the following classes of Consumers:

- Consumers below the age of 18;
- Consumers who reside in a country which restricts or prohibits trading in CFDs;
- Consumers who are in financial hardship or going through bankruptcy;
- Consumers who do not have the requisite knowledge for trading in CFDs;
- Consumers who have a low tolerance to risk;
- Consumers who do not have the ability and willingness to lose the sum of their deposits;
- Consumers who have low levels of literacy or numeracy, financial literacy and technological literacy;
- Consumers who wish to trade using income or cash that the Consumer relies on for living expenses;
- Vulnerable Consumers, including Consumers who are vulnerable for any of the following reasons:
  - suffering an age-related impairment;
  - suffering any form of cognitive 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; or
  - any other personal or financial circumstances causing significant detriment.

## Distribution conditions

Our CFDs are distributed by:

- Place a Trade itself; and
- Third party referrers also involved in the distribution of our CFDs (**Distributors**).

We will take reasonable steps to ensure that both we and any Distributors, 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.

We will also take reasonable steps to ensure that our marketing strategy and the marketing strategy of Distributors is targeting potential clients who fall within the identified target market. No Distributor may release marketing materials without obtaining our prior written consent.

## Monitoring and reviewing the TMD

### Periodic reviews

#### **We will perform periodic reviews of this TMD.**

The first review of this TMD will occur on 1<sup>st</sup> October 2022.

Subsequent reviews of the TMD will occur on each anniversary of the first review date.

### Review triggers – additional reviews

#### **We will also review the TMD where the following review triggers occur:**

- where there are significant dealings (issuing of CFDs) in Place a Trade's CFDs, which are not consistent with the target market or this TMD. This trigger occurs where significant distribution is occurring outside the target market, and does not refer to any one particular dealing in CFDs;
- where a Distributor has reported a large volume of complaints;
- where we have received a large volume of complaints;
- 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.

### Distributors – information collecting and reporting requirements

As part of the process of monitoring and reviewing the TMD to determine whether it is still appropriate, each Distributor must provide the following to us on a quarterly basis, within 10 business days of the end of each calendar quarter – 31 March, 30 June, 30 September and 31 December, each year:

- complaints data – information about the complaints received, including the number of complaints received;
- Consumer feedback (including regarding performance of the product);
- requests for information that the Distributor has received from clients;
- percentage of sales to clients who are not in the target market;
- volume of sales; and
- web analytics.

No party may engage in the distribution of our CFDs unless they have entered into an SLA/written Design & Distribution agreement with us.

Please contact us for further information and for a copy of our prescribed reporting template if you wish to become a Distributor of our CFDs.

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

For more information about your Target Market Determination – CFDs, please contact:

**Mail:** Level 35, Rialto South Tower, 525 Collins Street, Melbourne, 3000, Victoria, Australia

**Phone:** +61 3 8375 8802 **Email:** support@placeatrade.com

**Web:** www.placeatrade.com

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