

2026 Retail Client Target Market Determination - OANDA Products

**March 2026
Version 2.6**

**OANDA Australia Pty Ltd
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Level 26, Bligh Street
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Issuer	OANDA Australia Pty Ltd ACN 152 088 349; AFSL 412981
Financial Products issued by us	<p>A CFD is a leveraged over-the-counter (OTC) derivative that allows a client to speculate on the change in the value of an underlying asset, e.g., shares, indices, commodities, forex or cryptocurrencies. A CFD does not provide a client with any ownership of, or interest in, the underlying asset.</p> <p>A movement in the price or value of the CFD underlying asset will determine whether the client makes a profit or incurs a loss. Our CFDs are complex, leveraged financial products, which are traded OTC and not through an exchange. The ‘gearing’ or ‘leverage’ involved in trading CFDs means that a small initial margin payment can potentially lead to large losses. CFDs typically involve a variety of charges, including spreads and / or commission, and overnight funding.</p> <p>We issue CFDs in respect of the following underlying assets:</p> <ul style="list-style-type: none"> ● OANDA Index CFDs ● OANDA Commodity CFDs ● OANDA Bonds CFDs ● OANDA Cryptocurrency CFDs ● OANDA Metals CFDs ● OANDA FX CFDs, and ● OANDA Shares CFDs
TMD Version	2.6
Date of TMD	March 2026
Introduction	<p>OANDA Australia Pty Ltd (referred to as OANDA, us, our or we) operates a contracts for difference (CFDs) business. OANDA is a product issuer and issues CFDs products (known hereafter as OANDA Products) to clients, including retail clients. The design and distribution obligations set out in Part 7.8A Div 2 of the Corporations Act 2001 [Design and Distribution (DD) Obligations] apply to the issue and distribution of OANDA Products to retail clients from 5 October 2021.</p> <p>OANDA is authorised and regulated by the Australian Securities and Investments Commission (ASIC), with license number 412981 and has a registered office located at Level 1, 60 Martin Place, Sydney NSW 2000.</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.</p>
Purpose of the Target Market Determination	<p>A Target Market Determination (TMD) is a document which describes who a product is likely to be appropriate for (the target market), and any conditions around how the product can be distributed to customers. It also describes the events or circumstances where we may need to review the TMD for a financial product.</p> <p>This TMD is not a Product Disclosure Statement (PDS) and is not a summary of all of the product features and risks. This document does not consider any person’s individual objectives, financial situation or needs. Persons interested in acquiring a CFD should consider our PDS prior to entering into a CFD transaction with us.</p>

THE TARGET MARKET

Criteria	Scope and key attributes
<p>Target Market</p>	<p>Retail clients who satisfy each of the following criteria:</p> <ul style="list-style-type: none"> ● Clients over the age of 18 years. ● Clients who: <ul style="list-style-type: none"> ○ understand the higher risk of trading with leverage and have a high investment risk tolerance; or ○ are seeking to hedge potential future losses or protect previous gains from investments in other financial products. ● Clients who have the wealth to support losses that could amount to the total sum of money they invest without materially impacting their standard of living. ● Clients who are aware of the risk of incurring significant losses trading CFDs, which can be as great as the sum of the client's account balance, and the preparedness to bear such losses; and ● Clients who, with or without prior trade experience, demonstrate knowledge gained in: <ul style="list-style-type: none"> ○ The fundamentals of margin and leverage. ○ The inherent risks of trading CFDs, including the risk of significant losses, which can be as great as the sum of the retail client's account balance, and the preparedness to bear such losses. ○ The fees and costs associated with CFD trading ○ CFD pricing methodologies; and ○ The processes and technologies involved trading CFDs.. <p>Those retail clients who satisfy the above criteria and who likely have one or more of the following objectives, are in the target market for this product:</p> <ul style="list-style-type: none"> ● Speculative trading using leverage to seek higher returns with corresponding risk; ● Using leverage to gain short term exposure: <ul style="list-style-type: none"> ○ to price movements of an underlying asset, where exposure to the underlying asset may not be otherwise readily available; ○ to price movements of foreign underlying assets, where exposure to such underlying assets may not be otherwise as readily available; ○ to price movements of falling and rising markets; ○ to price movements of a diverse range of underlying assets via a single CFD account; ○ to the price movement of underlying assets without owning the underlying assets; ● Hedging (including hedging exposure to underlying assets and hedging positions taken in relation to other CFDs) potential future losses or protect previous gains from investments in other financial products and/or lower the cost of acquiring an economic exposure to underlying assets. <p>This target market determination does not apply to wholesale clients, including sophisticated investors or professional investors.</p>
<p>Likely Objectives</p>	<p>I. Retail clients who understand the higher risk of trading with leverage and have a high investment risk tolerance.</p>

	<p>Likely objectives:</p> <ul style="list-style-type: none"> ● Speculative trading using leverage to seek higher returns with corresponding risk; ● Using leverage to gain short term exposure: <ul style="list-style-type: none"> ○ to price movements of an underlying asset, where exposure to the underlying asset may not be otherwise readily available; ○ to price movements of foreign underlying assets, where exposure to such underlying assets may not be otherwise as readily available; ○ to price movements of falling and rising markets; ○ to price movements of a diverse range of underlying assets via a single CFD account; or ○ to the price movement of underlying assets without owning the underlying assets. <p>It is sufficient for a retail client to have one or more of the objectives above to fall within the target market for CFDs.</p> <p>Likely financial situation: Have disposable capital to use which would not materially impact their basic standard of living should they lose these funds.</p> <p>Likely needs: Appreciate and understand the higher risk of trading with leverage including in potentially volatile market conditions. The client wants to use disposable capital to make enhanced returns which may supplement their current source of wealth. The client wishes to use CFDs for foreign exchange risk management.</p> <p>II. Investors who use the product for risk mitigation:</p> <p>Likely objective: Hedging (including hedging exposure to underlying assets and hedging positions taken in relation to other CFDs) potential future losses or protect previous gains from investments in other financial products and/or lower the cost of acquiring economic exposure to underlying assets (e.g. carry trades).</p> <p>Likely financial situation: The client has existing or upcoming investments or exposures they wish to hedge. The client whose strategy involves, in part or in whole, a mid- or longer-term view of the markets (e.g: position holder, carry trader).</p> <p>Likely needs: Loss or profit protection.</p>
Tolerance to risk	CFDs are leveraged products that, due to underlying market movements, can generate losses rapidly. Losses can be significant, and a client may be required to deposit additional funds in order to maintain open positions and avoid being closed out. As it is possible to lose the entire balance of an account, CFDs are suitable for retail clients with a high-risk tolerance, except where a retail client wishes to trade CFDs for hedging purposes.
Knowledge and understanding	Only clients who have the requisite knowledge to trade in OANDA Products, as assessed by OANDA. OANDA undertakes assessment of the client's knowledge for trading in OANDA Products prior to approving and distributing the products to the client. The assessment comprises a questionnaire requiring the prospective retail client to

	<p>demonstrate their knowledge on a range of matters related to trading CFDs, including:</p> <ul style="list-style-type: none"> • The fundamentals of margin and leverage; • The inherent risks of trading CFDs, including the risk of significant losses; • The fees and costs associated with CFD trading; • CFD pricing methodologies; and • The processes and technologies involved trading CFDs.
<p>Ability to bear losses</p>	<p>A prospective retail client must satisfy OANDA’s internal wealth thresholds at the onboarding stage and on an annual basis thereafter. The OANDA assessment requires a prospective retail client to demonstrate their understanding of the inherent risks of trading CFDs, including the risk of significant losses, including losses that are equal to the sum of their total deposits and including any profits that may have been realised on their account.</p>
<p>Clients for whom OANDA Products are unsuitable</p>	<p>OANDA’s CFDs are not suitable for clients who are::</p> <ul style="list-style-type: none"> • Below the age of 18 years; • Retail clients who do not satisfy OANDA’s wealth thresholds; • Retail clients who reside in jurisdictions which prohibit trading in CFDs; • Retail clients who do not have the requisite knowledge for trading in CFDs; • Retail clients who need to preserve capital and have a low tolerance to investment risks, unless those clients wish to trade CFDs for hedging purposes; • Retail clients who are not prepared and able to incur losses trading CFDs, which can be as great as the sum of the retail client’s account balance.
<p>Assessment and Testing of OANDA Products</p>	<p>OANDA CFD products are leveraged over the counter (OTC) derivatives that allow a client to speculate on the change in value of an underlying asset e.g. foreign exchange, indices, commodities or cryptocurrencies. They can also be used to hedge assets that the client holds like share portfolios, foreign currency positions and any physical commodities like gold or silver. Clients have to put up a margin to gain exposure to a larger volume and higher value of the underlying product. This enables clients to potentially make large profits or losses on products traded and to effectively hedge their asset portfolios. The products can benefit clients who are seeking speculative returns and who wish to hedge portfolios in the short term.</p> <p>The products also enable clients to gain exposure to price movements of the underlying assets which may not be readily available, or where such exposure is required at short notice.</p> <p>We believe that clients in the target market as described above can benefit from this product provided, they are diligent and use risk management tools that are made available to them as part of the product offering. We will continually monitor the suitability of the product to ensure that it remains appropriate to clients in our target market. This will be done by analysis of data of clients onboarded, their profitability and the length of time they remain as a client.</p> <p>The product tends to benefit clients who wish to gain short-term exposure to the underlying assets and clients who use the risk management tools as well as training materials provided by OANDA.</p> <p>The products should continue to perform as expected provided they are</p>

	<p>distributed to clients in the target market. We do not believe that the product needs to be redesigned and narrowing of the target market is not currently necessary. Under average market conditions and under volatile conditions, the products should continue to perform the same, but the returns both hedging and speculative will be exaggerated in volatile markets.</p>
Distribution Conditions	<p>We will take reasonable steps to distribute OANDA's CFDs to the identified target market via the following processes.</p> <p>Onboarding Clients:</p> <p>OANDA will verify whether potential consumers fall within the identified target market during the onboarding process, before approving them and allowing them to trade OANDA Products on the trading platform. We have implemented requirements at the onboarding stage which includes minimum wealth requirements and knowledge assessments as part of the onboarding process.</p> <p>Training of staff</p> <p>OANDA provides training and resources to all front-line employees to emphasize compliance with OANDA's distribution conditions.</p> <p>Marketing OANDA's CFDs</p> <p>OANDA employs industry standard filters in our distribution channels as best as possible to target marketing content to the intended target market.</p> <p>Marketing material that refers to OANDA's CFDs must comply with OANDA's internal policies and be duly reviewed before distribution.</p> <p>No distributor may release marketing materials without obtaining our prior written consent.</p>

MONITORING AND REVIEWING THE TMD

Periodic Reviews of the TMD	<p>We perform periodic reviews of the TMD. The review of this TMD will be completed within 12 months of its issuance and more frequently if a review trigger occurs.</p> <p>Review triggers</p> <p>We will also review the TMD where there are significant dealings in 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. Review triggers include:</p> <ul style="list-style-type: none">• Where we become aware of any significant issuance of CFDs to retail clients outside the target market;• Where material changes are made to the CFD product as a result of new or amended functionality, so that the key attributes of the product are no longer consistent with the likely objectives, financial situation and needs of clients;• Where we become aware of an unusually large volume of complaints relating to CFDs from clients who may fall outside the TMD;• Where there are material changes to law or regulation applicable to CFDs, or a Product Intervention Order is introduced affecting the issuance or distribution of CFDs;• Any other event or circumstance occurs that would materially change a factor taken into account in making this target market determination. <p>Distributors – Information that must be reported</p> <p>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:</p> <ul style="list-style-type: none">• Complaints data – the number and details of any complaints received relating to OANDA's CFDs;• Retail client feedback (including feedback on the performance of OANDA's CFDs);• Any additional information requested by us. <p>In addition, where a Distributor becomes aware of significant dealing outside the target market, they must notify us as soon as reasonably practicable of becoming aware, and in any event within 10 business days after becoming aware. No party may engage in the distribution of our CFDs unless they have entered into a written 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.</p>
Update to TMD and contact details	<p>We reserve the right to amend this 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.</p>

Contact

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