

2023 Retail Client Target Market Determination - OANDA Products

**2 November 2023
Version 2.2**

**OANDA Australia Pty Ltd
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Level 1, 60 Martin Place
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Issuer	OANDA Australia Pty Ltd ACN 152 088 349; AFSL 412981
Financial Products issued by us	<p>OANDA Products are complex leveraged financial products, which are traded over the counter (OTC) and not through a regulated market. OANDA Products are agreements to exchange the difference in the value of a particular underlying asset. This allows clients to speculate on rising or falling prices of an underlying asset. These products are inherently risky, and this includes the risk of significant losses which cannot be greater than the client's account balance.</p> <p>Types of OANDA Products</p> <ul style="list-style-type: none"> ● OANDA Index CFDs ● OANDA Commodity CFDs ● OANDA Bonds CFDs ● OANDA Cryptocurrency CFDs ● OANDA Metals CFDs, and ● OANDA FX Products <p>This Target Market Determination (TMD) has been prepared specifically in relation to our OANDA Products.</p>
TMD Version	2.2
Date of TMD	2nd November 2023
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 and FX 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>The purpose of this TMD is to describe the target market of clients for our OANDA Products, 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), Financial Services Guide (FSG), Account Terms and Risk Warning before deciding whether to acquire or continue to hold the relevant product. You can get a copy of the relevant documents from our website https://www.oanda.com/au-en/trading/</p> <p>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 CFD trading account or trade in CFDs.</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 appetite; or ○ are seeking to hedge potential future losses or protect previous gains from investments in other financial products and therefore may be more risk averse than high risk tolerant investors. ● 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 OANDA products, which can be as great as the sum of the client's account balance as well as any realised profits, and the preparedness to bear such losses; and ● Clients who demonstrate knowledge gained in: <ul style="list-style-type: none"> ○ The fundamentals of margin and leverage. ○ The inherent risks of trading OANDA products, including the risk of significant losses, which can be as great as the sum of the retail client's account balance including realised profits, and the preparedness to bear such losses. ○ The fees and costs associated with trading OANDA products including financing charges and their impact on returns. ○ CFD pricing methodologies; and ○ The processes and technologies involved trading OANDA products. <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 OANDA products 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 appreciate and understand the high risk of trading with leverage and in potentially volatile market conditions</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 lifestyle and 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. 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.</p> <p>Likely financial situation: The client has existing or upcoming investments or exposures they wish to hedge.</p> <p>Likely needs: Loss or profit protection.</p>
<p>Tolerance to risk</p>	<p>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 appetite. There are particular risks associated with trading CFDs over an underlying asset. These are detailed in the PDS and Risk Warning available on our website.</p>
<p>Knowledge and understanding</p>	<p>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</p>

	<p>Products prior to approving and distributing the products to the client. The assessment comprises a questionnaire requiring the prospective retail client to demonstrate their knowledge on a range of matters related to trading CFDs.</p>
<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 CFD knowledge 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 Products are generally unsuitable for the following classes of clients:</p> <ul style="list-style-type: none"> ● Clients below the age of 18 years; ● Clients who reside in a country which restricts or prohibits trading in OANDA Products; ● Clients who do not have the requisite knowledge for trading OANDA Products; ● Clients who have a low-risk appetite apart from those clients who wish to trade CFDs for hedging purposes; ● Clients who do not have the ability and readiness to lose the sum of their deposits; ● Clients who wish to trade using loan funds, welfare benefits or pensions for trading purposes; ● Clients who have low levels of literacy or numeracy, financial literacy and technology literacy; ● Clients who wish to trade using their retirement savings, loan funds, income or cash that the client relies on for living expenses or personal savings; ● Vulnerable clients who are vulnerable for any of the following reasons <ul style="list-style-type: none"> ● elderly or suffering an age-related impairment; ● suffering any form of cognitive impairment; ● suffering from elder or financial abuse; ● job loss; ● experiencing family violence; ● 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.
<p>Assessment and Testing of OANDA Products</p>	<p>OANDA FX and 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. If seeking a long-term hedging product, these products may not be suitable due to the funding costs charged on the products.</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 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>
<p>Distribution Conditions</p>	<p>Our OANDA Products are distributed by OANDA Australia Pty Ltd (OANDA).</p> <p>OANDA will take reasonable steps to ensure that we distribute the OANDA Products to the identified target market.</p> <p>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. 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 stringent requirements at the onboarding stage which includes minimum wealth requirements and knowledge assessments which are detailed in our onboarding policies.</p> <p>We will also take reasonable steps to ensure that our marketing strategy is targeting potential retail clients who fall within the identified target market. All new marketing campaigns shall be reviewed and approved by Compliance prior to its publication, to check that it does not contain elements which may attract potential clients outside of the intended target market.</p>

MONITORING AND REVIEWING THE TMD

<p>Periodic Reviews</p>	<p>We perform periodic reviews of this 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>The attributes of the TMD will be reviewed on an ongoing basis by an analysis of the management information that is produced on onboarding, client performance, vulnerable clients and distribution analytics. If any of this management information suggests that our TMD needs to be reviewed, we will review the TMD within ten business days of the receipt of the relevant information.</p>
<p>Review Triggers - Additional Reviews</p>	<p>We also review the TMD where the following review triggers occur:</p> <ul style="list-style-type: none"> ● Where there is significant issuance of OANDA Products and /or dealings in OANDA products, which are not consistent with the target market or this TMD. This trigger refers to all dealings in OANDA Products; ● Where material changes are made to OANDA products 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; ● Unusually high volume of complaints relating to OANDA products from clients who may fall outside the TMD; ● Where OANDA has detected significant issues with the distribution of OANDA Products through our monitoring of our own day-to-day activities; ● Where there are material changes to law or regulation applicable to OANDA products, or a Product Intervention Order is introduced affecting the issuance or distribution of OANDA Products; ● The occurrence of any event or circumstance occurs which would materially change a factor taken into account in making this TMD; ● A significant change in the performance of products relevant to the clients' investment objective, such as underlying benchmarks or the performance of similar products.
<p>Information Collecting and Reporting Requirements</p>	<p>As part of the process of monitoring and reviewing the TMD to determine whether it is still appropriate, OANDA will have available the following information on a quarterly basis for the board of directors of OANDA Australia (Pty) Ltd and monthly for the Risk Committee of OANDA Australia (Pty) Limited.</p> <ul style="list-style-type: none"> ● Complaints data – information about the complaints received, including the number of complaints received; ● Percentage and a number of accounts opened for clients who are not in the target market; ● A large increase in new clients who fail the knowledge assessment; ● Notable changes in the profitability of clients; and ● Notable changes in the financial situation of clients.

OANDA Australia Pty Ltd reserves 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.

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