

Blueberry.

Target Market Determination

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The information on this website is general information only and does not take into account your objectives, financial situation or needs. You should, before acting on this information, consider the appropriateness of the information having regard to your objectives, financial situation and needs.

Blueberry Australia Pty Ltd (ABN 67 646 513 797) (AFSL 535887) is authorised to give general advice, to deal and make a market in derivatives and foreign exchange contracts. You should read the PDS, Client Agreement, FSG and Target Market Determination and consider your objectives, financial situation and needs before deciding whether to acquire or continue to hold the relevant product. You can obtain a copy of the relevant documents from our website. Trading FX and CFDs on margin involves a high level of risk and may not be suitable for all investors. As margin FX/CFDs are highly leveraged products, your gains and losses are magnified, and you could lose substantially more than your initial deposit. Investing in margin FX/CFDs does not give you any entitlements or rights to the underlying assets (e.g. the right to receive dividend payments).

The information on this website, and the services provided by Blueberry Australia Pty Ltd are not intended for residents outside of Australia.

au.blueberrymarkets.com

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Introduction

This Target Market Determination (TMD) is dated 31 May 2024 and was prepared by Blueberry Australia Pty Ltd trading as Blueberry Markets Group (“Blueberry Markets, we, our, us”). Blueberry Markets is authorised and regulated by the Australian Securities and Investments Commission (ASIC), with license number 535887.

Blueberry Markets operates a contracts for difference (CFDs) business. Blueberry Markets 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.

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;
- Commodities, including precious metals;
- Indices, including stock market indices;
- Cryptoassets; and
- Shares.

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; and
- 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** with a high risk tolerance where a client is seeking to make a profit via speculation;
- **hedging** (including hedging exposure to underlying assets and hedging positions taken in relation to other CFDs)

are in the target market for Blueberry Market's CFDs.

Target market – criteria, scope and key attributes

Further details regarding our target market for CFDs trading is set out below. **Throughout these Terms and Conditions.**

Criteria	Scope and Key Attributes
Client Type	Retail clients This target market determination does not apply to wholesale clients, including sophisticated investors and professional investors
Knowledge and Experience	Only clients who have the requisite knowledge and experience to trade in CFDs, as assessed by us. We undertake an assessment of the Consumer's experience and knowledge trading in CFDs prior to approving and distributing the products to the client
Ability to bear losses	Clients who are prepared to lose amounts that can be as great as the sum of their total deposits
Tolerance to risk	CFDs are suitable for clients with high investment risk tolerance.
Client Needs	<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"> ● have a short term investment horizon; and ● wish to trade in CFDs, including for speculative or hedging purposes, or ● have a high investment risk tolerance; and ● can afford to bear losses. <p>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.</p> <p>Consumers who meet all of the requirements (1, 2, 3 and 4), as set out in the above bullet points are likely to be in the target market for our CFDs.</p> <p>Consumers who do not satisfy both 3 and 4 above, are unlikely to be in the target market for the CFDs.</p> <p>CFDS will generally not be suitable for Clients outside the target market. Potential categories include clients who are:</p> <ul style="list-style-type: none"> ● are seeking investment with stability; ● are risk-averse, other than those Clients who wish to use CFDs to hedge existing investments; ● are seeking regular or otherwise predictable returns on their investments; ● cannot afford to bear losses; and

	<ul style="list-style-type: none"> • who have not passed RG227 Client Qualification questionnaire; <p>Consumers who fall into any of the categories set out immediately above, are not in the target market for CFDs.</p>
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Distribution conditions

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 will only permit distribution of CFDs issued by Blueberry Markets in accordance with procedures specified by Blueberry Markets and where we consider on reasonable grounds that each relevant client is likely to be within the target market. Third party distributors must evidence appropriate procedures, processes and controls that allows CFDs to be distributed in accordance with this TMD.

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.

This TMD will be reviewed at least every 12 months from the date of this TMD, and more frequently if a review trigger below occurs.

Review Triggers – Additional Reviews

Review triggers that suggests the TMD is no longer appropriate and a review of the TMD should be undertaken include:

- where there are significant dealings (issuing of CFDs) in Blueberry Market's CFDs, which are not consistent with the target market or TMD. The 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 significant number of complaints or noted any relevant complaints trends;
- where there are material changes to law or regulations affecting CFDs; and
- 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 half yearly basis, within 10 business days of the end of 30 June 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 with us.

Contact

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

Department: Compliance Department

Email address: compliance@blueberrymarkets.com

Website: www.blueberrymarkets.com

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.