



TARGET MARKET DETERMINATIONS

NON-CASH PAYMENT FACILITY & SPOT FOREIGN EXCHANGE CONTRACTS

NON-CASH PAYMENT FACILITY & FORWARD FOREIGN EXCHANGE CONTRACTS

NON-CASH PAYMENT FACILITY & FX OPTION CONTRACTS

NON-CASH PAYMENT FACILITY & FX STRUCTURED OPTION CONTRACTS

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Introduction

CURRENC Pty Ltd (referred to as CURRENC, us, our or we) operates a payments business. Our services allow you to make and receive global payments in various currencies, and hedge currency risk associated with those payments. 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 Non-cash payment facility, certain foreign exchange contracts and derivatives to retail clients (Consumers) from 5 October 2021.

We are authorised and regulated by the Australian Securities and Investments Commission (ASIC), with licence number 505118 and registered office located at Suite 515 of 180 Ocean Street, Edgecliff NSW 2027.

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.

We are a product issuer and we issue the following financial products to clients, including retail clients:

- Non-cash payment facility;
- Spot foreign exchange contracts;
- Forward foreign exchange contracts, which are derivatives for some purposes;
- FX Option contracts, which are derivatives; and
- FX Structured Option contracts, which are derivatives,

referred to collectively as products.

We offer these products to help you engage in money transfer and foreign currency exchange or hedging transactions.

The purpose of this target market determination (TMD) is to describe the target market of Consumers for our Non-cash Payment Facility and the over-the-counter (OTC) Spot foreign exchange contracts, Forward foreign exchange contracts, FX Option contracts and FX Structured Option contracts, to which the DD Obligations apply.

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 transact on the contents of this TMD.

Financial products issued by us

As a payments business, we issue the following products:

- Non-cash payment facility;
- Spot foreign exchange contracts;
- Forward foreign exchange contracts, which are derivatives for some purposes;
- FX Option contracts, which are derivatives; and
- FX Structured Option contracts, which are derivatives,

Non-Cash Payment Facility and Spot foreign exchange contracts

Non-cash payment facility

Non-cash payment products are products that allow Consumers to make payments, otherwise than through the physical delivery of Australian or foreign currency (e.g. electronic cash and debit services).

Consumers who make or receive payments in one currency, where the currency is exchanged and the conversion does not settle immediately, are also issued with foreign exchange contracts or derivatives, depending on the settlement period and characteristics of the product.

Spot foreign exchange contracts

Foreign exchange contracts are contracts to buy or sell currency, or to exchange one currency for another currency (whether Australian currency is involved in the transaction or not).

The parties to a foreign exchange contract agree to effect a currency transaction between them, at a predetermined quoted rate of exchange, on an agreed date.

Foreign exchange contracts (which are not settled immediately) with a settlement date that is up to 2 days after

the date on which the contract was entered into, are spot foreign exchange contracts.

Client’s may request a limit order spot price with CURRENC. A limit order is an order to buy or sell spot currency at a specified price or better. While the price is specified, the filling of the Limit order may not be. If the currency does not reach the specified price, the order is not filled.

The financial products we offer

As we offer the above products, Non-Cash payment facility and Spot foreign exchange contracts, to Consumers together, and they are effectively bundled, this TMD applies to both of the products.

The target market

The target market for Non-Cash payment facility and Spot foreign exchange contracts includes the following classes of Consumers

Customers who satisfy the following criteria

- Consumers above the age of 18;
- Consumers who are seeking to make and receive payments, including payments made in foreign currencies;

Those Consumers who satisfy the above criteria, and who satisfy one or more of the following purposes:

- Consumers who are looking to make and receive domestic and global payments to and from third parties;
- Businesses, including importers and exporters who deal with overseas suppliers or customers;
- Consumers who wish to agree to a spot exchange rate for payment within a T+2 timeframe;

Target market – criteria, scope and key attributes

Further details regarding the target market for Non-Cash payment facility and Spot foreign exchange contracts are set out below:

Criteria	Non-cash payment facility	Spot foreign exchange contracts
Client type	Retail clients	Retail clients
	Non-Cash payment facility and Spot foreign exchange contracts are for both retail and wholesale clients. This target market determination does not apply to wholesale clients, including sophisticated investors and professional investors.	
Ability to bear losses	Consumers who are prepared to: <ul style="list-style-type: none"> • accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events • Consumers must be prepared to accept counterparty risk • Consumers may not receive the most favourable exchange rate due to the immediate lock in of exchange rate prices on spot contracts • Limit orders may not be filled in a fast moving market 	
Client needs	Our Non-cash payment product and the key attributes are likely to be consistent with the likely objectives, financial situation and needs of those Consumers who: <ul style="list-style-type: none"> • wish to make domestic and global non-cash payments 	Spot foreign exchange contracts and their key attributes are likely to be consistent with the likely objectives, financial situation and needs of those Consumers who: <ul style="list-style-type: none"> • wish to agree to a spot exchange rate for payment within a T+2 timeframe

Consumers who meet each of the *client needs* for the relevant products as set out in the table above, are in the target market for those products, excluding Consumers who cannot, or do not wish to accept the risks, as set out in the *ability to bear losses* section, for any of the relevant financial products.

Consumers who meet most, but not all of the *client needs* for the relevant products as set out in the table above, are potentially in the target market for those products.

Consumers for whom our products are unsuitable

Our Non-cash payment facility and Spot foreign exchange contracts are generally unsuitable for the following classes of consumers:

- Consumers below the age of 18;
- Consumers who do not wish to be exposed to counterparty risk of any form;
- Consumers who have low levels of financial literacy and technological literacy;
- Consumers who are looking to engage in speculative trading
- Consumers looking to settle the contract more than T+2 may use Forward contracts

Consumers who are in any of these categories are not in the target market for the relevant payment products.

Distribution conditions

Our Non-cash payment facility and Spot foreign exchange contracts are distributed by

- CURRENC directly through our online platform; and
- By speaking with us;

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.

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 for our products. All marketing material is reviewed and approved by CURRENC as the product issuer prior to publication to verify the communication is directed at the intended target market.

Monitoring and reviewing the Non-cash payment facility and Spot foreign exchange contracts TMD

Periodic reviews

We will perform periodic reviews of the Non-cash payment facility and Spot foreign exchange contracts TMD.

- The first review of this TMD will occur on 04 October 2022.
- Subsequent reviews of the TMD will occur annually on 04 October thereafter.

Review triggers – additional reviews

CURRENC will also review the Non-cash payment facility and Spot foreign exchange contracts TMD where the following review triggers occur:

- where there are significant dealings (issuing of any of the above products) 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;
- where we have received a significant number of complaints or noted any relevant complaint trends;
- where we have detected significant issues with the distribution of our products through our monitoring of our own day-to-day activities;

Non-Cash payment facility and Forward foreign exchange contracts

Non-cash payment facility

Non-cash payment products are products that allow Consumers to make payments, otherwise than through the physical delivery of Australian or foreign currency (e.g. electronic cash and debit services).

Consumers who make or receive payments in one currency, where the currency is exchanged and the conversion does not settle immediately, are also issued with foreign exchange contracts or derivatives, depending on the

settlement period and characteristics of the product.

Forward foreign exchange contracts

Foreign exchange contracts are contracts to buy or sell currency, or to exchange one currency for another currency (whether Australian currency is involved in the transaction or not).

The parties to a foreign exchange contract agree to effect a currency transaction between them, at a predetermined rate of exchange, on an agreed date.

Foreign exchange contracts, with a settlement date of at least 3 business days (or longer), are derivatives for the purpose of this TMD. We may not have a 'derivatives' authorisation on our licence because ASIC says that, for the purposes of licensing, a derivative that is also a foreign exchange contract, is not a derivative.

The financial products we offer

As we offer Non-cash payment facility and Forward foreign exchange contracts, to Consumers together, and they are effectively bundled, this TMD applies to both of the products.

The target market

The target market for Non-cash payment facility and Forward foreign exchange contracts includes the following classes of Consumers

Customers who satisfy the following criteria

- Consumers above the age of 18;
- Consumers who are seeking to make and receive payments, including payments made in foreign currencies;
- Consumers who are seeking to lock in a foreign currency exchange rate at a future date;

Those Consumers who satisfy the above criteria, and who satisfy one or more of the following purposes:

- Consumers who are looking to make and receive domestic and global payments to and from third parties;
- Businesses, including importers and exporters who deal with overseas suppliers or customers;
- Consumers who seek to manage or hedge foreign exchange exposure and manage future cash flows; and
- Consumers who are seeking to lock in a foreign currency exchange rate at a future date,

are in the target market for our products.

Target market – criteria, scope and key attributes

Further details regarding the target market for Non-cash payment facility and Forward foreign exchange contracts are set out below:

Criteria	Non-cash payment facility	Forward foreign exchange contracts
Client type	Retail clients	Retail clients
	Non-Cash payment facility and Forward foreign exchange contracts are for both retail and wholesale clients. This target market determination does not apply to wholesale clients, including sophisticated investors and professional investors.	
Ability to bear losses	Consumers who are prepared to: <ul style="list-style-type: none"> • accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events • Consumers must be prepared to accept counterparty risk 	Consumers who are prepared to: <ul style="list-style-type: none"> • accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events • Consumers must be prepared to accept counterparty risk • lock in a currency exchange rate that may be disadvantageous at settlement
Client needs	Our Non-cash payment facility and the key attributes are likely to be consistent with the likely objectives,	Our Forward foreign exchange contract product and their key attributes are likely to be consistent with the likely objectives,

	<p>financial situation and needs of those Consumers who:</p> <ul style="list-style-type: none"> wish to make domestic and global non-cash payments 	<p>financial situation and needs of those Consumers who:</p> <ul style="list-style-type: none"> wish to make domestic and global non-cash payments wish to agree to an exchange rate more than 2 business days later, to avoid risks associated with foreign exchange volatility for that agreed period wish to manage foreign exchange exposure, by selecting their desired settlement period which is more than T+2
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Consumers who meet each of the *client needs* for the relevant products as set out in the table above, are in the target market for those products, excluding Consumers who cannot, or do not wish to accept the risks, as set out in the *ability to bear losses* section, for any of the relevant financial products.

Consumers who meet most, but not all of the *client needs* for the relevant products as set out in the table above, are potentially in the target market for those products.

Consumers for whom our products are unsuitable

Our Non-cash payment facility and Forward foreign exchange contracts are generally unsuitable for the following classes of consumers:

- Consumers below the age of 18;
- Consumers who do not wish to be exposed to counterparty risk of any form;
- Consumers who have low levels of financial literacy and technological literacy;
- Consumers who wish to transact foreign currency within T+2 timeframe;
- Consumers who are looking to engage in speculative trading;
- Consumers who want quick (no more than T+2) payments and conversions;

Consumers who are in any of these categories are not in the target market for the Non-cash payment facility and Forward foreign exchange contracts products.

Distribution conditions

Our Non-cash payment facility and Forward foreign exchange contracts are distributed by

- CURRENC directly through our online platform; and
- By speaking with us;

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.

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 for our products. All marketing material is reviewed and approved by CURRENC as the product issuer prior to publication to verify the communication is directed at the intended target market.

Monitoring and reviewing the Non-cash payment facility and Forward foreign exchange contracts TMD

Periodic reviews

We will perform periodic reviews of this Non-cash payment facility and Forward foreign exchange contract TMD.

- The first review of this TMD will occur on 04 October 2022.
- Subsequent reviews of the TMD will occur annually on 04 October thereafter.

Review triggers – additional reviews

CURRENC will also review the Non-cash payment facility and Forward foreign exchange contracts TMD where the following review triggers occur:

- where there are significant dealings (issuing of any of the above products) 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;
- where we have received a significant number of complaints or noted any relevant complaint trends;
- where we have detected significant issues with the distribution of our products through our monitoring of our own day-to-day activities;

Non-cash payment facility and FX Option contracts

Non-cash payment facility

Non-cash payment products are products that allow Consumers to make payments, otherwise than through the physical delivery of Australian or foreign currency (e.g. electronic cash and debit services).

Consumers who make or receive payments in one currency, where the currency is exchanged and the conversion does not settle immediately, are also issued with foreign exchange contracts or derivatives, depending on the settlement period and characteristics of the product.

FX Option contracts

CURRENC offer FX Options including Call and Put options, as well as FX Structured Options.

A FX Option Call (Buy) or Put (Sell), are contracts that provide the right, but not the obligation, to enter into a foreign currency transfer at a predetermined exchange rate on a pre-determined date in the future when exercised by the purchaser. To enter a FX Option contract Call or Put, a Premium amount is paid for the Option. Please refer to the Product Disclosure Statement for details of the FX Option contracts available.

Foreign exchange contracts, with a settlement date of at least 3 business days (or longer), are derivatives for the purpose of this TMD. FX Option Contracts are derivatives. We may not have a 'derivatives' authorisation on our licence because ASIC says that, for the purposes of licensing, a derivative that is also a foreign exchange contract, is not a derivative.

The financial products we offer

As we offer Non-cash payment facility and FX Option contracts, to Consumers together, and they are effectively bundled, this TMD applies to both of the products.

The target market

The target market for Non-cash payment facility and FX Option contracts includes the following classes of Consumers

Customers who satisfy the following criteria

- Consumers above the age of 18;
- Consumers who are seeking to make and receive payments, including payments made in foreign currencies;

Those Consumers who satisfy the above criteria, and who satisfy one or more of the following purposes:

- Consumers who are looking to make and receive domestic and global payments to and from third parties;
- Businesses, including importers and exporters who deal with overseas suppliers or customers;
- Consumers who seek to manage or hedge foreign exchange exposure and manage future cash flows; and
- Consumers seeking right but not the obligation, to conduct a foreign exchange transfer at a favourable agreed rate at a future agreed date, on exercise of a Call or a Put FX Option contract.

are in the target market for our products.

Target market – criteria, scope and key attributes

Further details regarding the target market for FX Option Call or Put contracts are set out below:

Criteria	Non-cash payment facility	FX Option Call or Put contracts
Client type	Retail clients	Retail clients

	<p>Non-cash payment facility and FX Option contracts are for both retail and wholesale clients. This target market determination does not apply to wholesale clients, including sophisticated investors and professional investors.</p>	
<p>Ability to bear losses</p>	<p>Consumers who are prepared to:</p> <ul style="list-style-type: none"> • accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events • Consumers must be prepared to accept counterparty risk 	<p>Consumers who are prepared to:</p> <ul style="list-style-type: none"> • accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events • Consumers must be prepared to accept counterparty risk • The premium amount paid may not result in a currency exchange rate that is favourable, causing loss of Premium • An unexercised option with intrinsic value will lapse and be worthless after the expiration time on the expiration date. • The FX Option currency exchange rate may be disadvantageous or 'out of the money' at Option expiry, causing loss of Premium
<p>Client needs</p>	<p>Our Non-cash payment facilities and the 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"> • wish to make domestic and global non-cash payments 	<p>Our FX Option contract products 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"> • wish to make domestic and global non-cash payments • Has flexibility on the payment date should the FX Option expire out of the money. • wish to agree to an exchange rate more than 2 business days later, if the price is favourable, without further obligation if the price is out of the money.

Consumers who meet each of the *client needs* for the relevant products as set out in the tables above, are in the target market for those products, excluding Consumers who cannot, or do not wish to accept the risks, as set out in the *ability to bear losses* section, for any of the relevant financial products.

Consumers who meet most, but not all of the *client needs* for the relevant products as set out in the tables above, are potentially in the target market for those products.

Consumers for whom our products are unsuitable

Our Non-cash payment facility and FX Option contracts are generally unsuitable for the following classes of consumers:

- Consumers below the age of 18;
- Consumers who do not wish to be exposed to counterparty risk of any form;
- Consumers who have low levels of financial literacy and technological literacy;
- Consumers who wish to transact foreign currency within T+2 timeframe;
- Consumers who want quick (no more than T+2) payments and conversions;
- Consumers who cannot bear loss of Premium on unfavourable market prices for Call or Put options; and
- Consumers who must transact on a specific future date, more than T+2 for Call or Put options

Consumers who are in any of these categories are not in the target market for the Non-cash payment facility and FX Option contract products.

Distribution conditions

Our Non-cash payment facility and FX Option contracts are distributed by

- CURRENC directly through our online platform; and
- By speaking with us (excluding structured FX Option contracts);

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.

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 for our products. All marketing material is reviewed and approved by CURRENC as the product issuer prior to publication to verify the communication is directed at the intended target market.

Monitoring and reviewing the Non-cash payment facility and FX Option contracts TMD

Periodic reviews

We will perform periodic reviews of this Non-cash payment facility and FX Option contracts TMD.

- The first review of this TMD will occur on 04 October 2022.
- Subsequent reviews of the TMD will occur annually on 04 October thereafter.

Review triggers – additional reviews

CURRENC will also review the TMD where the following review triggers occur:

- where there are significant dealings (issuing of any of the above products) 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;
- where we have received a significant number of complaints or noted any relevant complaint trends;
- where we have detected significant issues with the distribution of our products through our monitoring of our own day-to-day activities;

Non-cash payment facility and FX Structured Option contracts

Non-cash payment facility

Non-cash payment products are products that allow Consumers to make payments, otherwise than through the physical delivery of Australian or foreign currency (e.g. electronic cash and debit services).

Consumers who make or receive payments in one currency, where the currency is exchanged and the conversion does not settle immediately, are also issued with foreign exchange contracts or derivatives, depending on the settlement period and characteristics of the product.

FX Structured Option contracts

CURRENC offer FX Structured Options including Forward Extra and Collar style Participating Forward contracts.

A Forward Extra is a premium free option with a Protection rate (strike rate) to cover against any adverse exchange rate movements, while at the same time the ability to participate in favourable exchange rate movements up to the knock-in barrier at contract expiry.

An agreed upper barrier is known as a 'knock-in barrier'. Should the spot rate touch the upper barrier level anytime from the date the contract is booked and until execution, the contract is 'knocked-in' activating the Protection rate. Should the spot rate not trade at or above the 'knock-in barrier' during the contract, 100% benefit is achieved by trading on the available spot rate more favourable than the Protection rate. If at expiry of the contract, the spot rate is below the protection rate, the purchaser can exercise the right to trade at the Protection rate.

A Participating Forward contract is a premium free contract that allows participation in part of a favourable exchange rate movement by selecting the amount to protect. This might be 50/50 or another agreed ratio. The first half has nominated a Participation rate (strike rate) and is an obligation to exchange a specified amount of foreign currency on a certain date at a specified rate.

The second half provides the right, but not the obligation, to exchange a specified amount of foreign currency on a

certain date at a specified rate to take advantage of a more favourable spot rate if it becomes available.

Please refer to the Product Disclosure Statement for details of the FX Structured Option contracts available.

Foreign exchange contracts, with a settlement date of at least 3 business days (or longer), are derivatives for the purpose of this TMD. FX Structured Option Contracts are derivatives. We may not have a ‘derivatives’ authorisation on our licence because ASIC says that, for the purposes of licensing, a derivative that is also a foreign exchange contract, is not a derivative.

The financial products we offer

As we offer Non-cash payment facility and FX Structured Option contracts, to Consumers together, and they are effectively bundled, this TMD applies to both of the products.

The target market

The target market for Non-cash payment facility and FX Structured Option contracts includes the following classes of Consumers

Customers who satisfy the following criteria

- Consumers above the age of 18;
- Consumers who are seeking to make and receive payments, including payments made in foreign currencies;

Those Consumers who satisfy the above criteria, and who satisfy one or more of the following purposes:

- Consumers who are looking to make and receive domestic and global payments to and from third parties;
- Businesses, including importers and exporters who deal with overseas suppliers or customers;
- Consumers who seek to manage or hedge foreign exchange exposure and manage future cash flows;
- Consumers who are seeking the right to exercise a foreign currency exchange rate for a protected rate agreed amount at a future date, or at a better prevailing spot rate, less than the knock in barrier; and
- Consumers who are seeking to take part advantage of a better spot rate if available while covering their foreign exchange transfer exposure at the participation rate

are in the target market for our products.

Target market – criteria, scope and key attributes

Further details regarding the target market for FX Structured Option Forward Extra contracts are set out below:

Criteria	Non-cash payment facility	FX Structured Option Forward Extra contract
Client type	Retail clients	Retail clients
	Non-cash payment facility and FX Structured Option Forward Extra contracts are for both retail and wholesale clients. This target market determination does not apply to wholesale clients, including sophisticated investors and professional investors.	
Ability to bear losses	<p>Consumers who are prepared to:</p> <ul style="list-style-type: none"> • accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events • Consumers must be prepared to accept counterparty risk 	<p>Consumers who are prepared to:</p> <ul style="list-style-type: none"> • accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events • Consumers must be prepared to accept counterparty risk • The protected rate agreed is less favourable than the prevailing Forward rate available • The protected rate agreed may not result in a currency exchange rate that is favourable compared to the prevailing Forward rate available
Client	Our Non-cash payment facility and the	Our FX Structured Option Forward Extra

needs	<p>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"> wish to make domestic and global non-cash payments 	<p>contract products 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"> wish to make domestic and global non-cash payments more than T+2 Consumers who are seeking the right to exercise a foreign currency exchange rate at a protected rate at a future date or at a better prevailing spot rate, less than the knock in barrier rate. wish to manage foreign exchange exposure, by selecting their desired settlement period against unfavourable currency movement whilst allowing flexibility to take advantage of some favourable movements.
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Details regarding the target market for FX Structured Option Participating Forward contracts are set out below:

Criteria	Non-cash payment facility	FX Structured Option Participating Forward contract
Client type	Retail clients	Retail clients
	Non-cash payment facility and FX Structured Option Participating Forward contracts are for both retail and wholesale clients. This target market determination does not apply to wholesale clients, including sophisticated investors and professional investors.	
Ability to bear losses	<p>Consumers who are prepared to:</p> <ul style="list-style-type: none"> accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events Consumers must be prepared to accept counterparty risk 	<p>Consumers who are prepared to:</p> <ul style="list-style-type: none"> accept risks associated with payment delays and losses associated with political instability, war, suspension of financial markets and catastrophic events Consumers must be prepared to accept counterparty risk The participation rate will be less favourable than the prevailing Forward rate The participation rate agreed may not result in a combined currency exchange rate that is favourable compared to the prevailing forward rate available
Client needs	<p>Our Non-cash payment facility and the 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"> wish to make domestic and global non-cash payments 	<p>Our FX Structured Option Participating Forward contract products 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"> wish to make domestic and global non-cash payments more than T+2 Consumers who are seeking the right to exercise a foreign currency exchange rate at a participation rate at a future date and wanting to also transact part at a better prevailing spot rate if available

		<ul style="list-style-type: none"> wish to manage foreign exchange exposure, by selecting a desired settlement period against unfavourable currency movement whilst allowing flexibility to take advantage of part favourable price without obligation
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Consumers who meet each of the *client needs* for the relevant products as set out in the tables above, are in the target market for those products, excluding Consumers who cannot, or do not wish to accept the risks, as set out in the *ability to bear losses* section, for any of the relevant financial products.

Consumers who meet most, but not all of the *client needs* for the relevant products as set out in the tables above, are potentially in the target market for those products.

Consumers for whom our products are unsuitable

Our Non-cash payment facility and FX Option contracts are generally unsuitable for the following classes of consumers:

- Consumers below the age of 18;
- Consumers who do not wish to be exposed to counterparty risk of any form;
- Consumers who have low levels of financial literacy and technological literacy;
- Consumers who wish to transact foreign currency within T+2 timeframe;
- Consumers who want quick (no more than T+2) payments and conversions;
- Consumers not willing to have uncertainty around receiving a more favourable spot rate if available;
- Consumers who do not want the obligation of the protected rate for Forward Extra options;
- Consumers unwilling to transact at the protected rate for a Forward Extra contract compared to a Forward contract;
- Consumers who do not want the obligation of the participation rate for Participating Forwards; and
- Consumers unwilling to transact at the participation rate for Participating Forwards compared to a Forward contract

Consumers who are in any of these categories are not in the target market for the Non-cash payment facility and FX Structured Option contract products.

Distribution conditions

Our Non-cash payment facility and FX Structured Option contracts are distributed by

- CURRENC directly through our online platform.

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.

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 for our products. All marketing material is reviewed and approved by CURRENC as the product issuer prior to publication to verify the communication is directed at the intended target market.

Monitoring and reviewing the Non-cash payment facility and FX Structured Option contracts TMD

Periodic reviews

We will perform periodic reviews of this Non-cash payment facility and FX Structured Option contracts TMD.

- The first review of this TMD will occur on 04 October 2022.
- Subsequent reviews of the TMD will occur annually on 04 October thereafter.

Review triggers – additional reviews

CURRENC will also review the Non-cash payment facility and FX Structured Option contracts TMD where the following review triggers occur:

- where there are significant dealings (issuing of any of the above products) 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;

- where we have received a significant number of complaints or noted any relevant complaint trends;
- where we have detected significant issues with the distribution of our products through our monitoring of our own day-to-day activities;

CURRENC reserves the right to amend the TMDs 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 CURRENC considers as a proper reason to amend the TMD.

This booklet is effective as of October 2021.