

GO Markets Pty Ltd

Target Market Determination (TMD) – Retail Clients – Contracts for Difference

Version Date: March 2026

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ABN 85 081 864 039 - AFSL 254963



GO MARKETS

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Issuer	Go Markets Pty Ltd (GO Markets)
Product	Over-the-Counter Derivatives (OTC) - Contracts for Difference (CFD)
Effective Date	11 March 2026

1. About us

GO Markets is registered with the Australian Securities and Investments Commission (**ASIC**) and holds an Australian Financial Services Licence (AFSL 254963). Its registered office is Level 7, 447 Collins Street, Melbourne VIC 3000, Australia.

2. Design and distribution obligations

GO Markets is required to comply with the design and distribution obligations (**DDO**) in Part 7.8A of the *Corporations Act 2001* (Cth) (**Corporations Act**). These obligations require GO Markets to make a Target Market Determination (TMD) and take reasonable steps to ensure the product is distributed to retail clients who are likely to be within the target market.

The DDO Policy applies to products issued by GO Markets from 05 October 2021.

3. Purpose

This document is a Target Market Determination (**TMD**) made under section 994B of the Corporations Act and is intended to:

- Describe the class of Clients that comprises the target market for the Products.
- Specify the distribution conditions that apply to the distribution of the Products.
- Specifies review triggers that would reasonably suggest that this TMD is no longer appropriate.
- Specifies review periods in which the TMD must be reviewed.
- Specify the information required for GO Markets to promptly determine whether a review trigger, event, or circumstance suggests that the determination is no longer appropriate.

If you do not fall within the target market defined in this TMD, then our products and services are not intended for or suitable for you.

This TMD is not a Product Disclosure Statement (**PDS**) and does not consider any client’s specific objectives, financial situation or needs. CFDs are generally only suitable for clients who understand the product and its risks. See the Product Overview below for key features and risks. Before trading, read our PDS, Financial Services Guide (**FSG**) and Terms and Conditions (**T&Cs**) available on our website (and any other relevant documents), and consider obtaining independent advice.

This document applies to retail clients only (**Clients**).

4. Our financial products

GO Markets is an issuer and distributor of CFDs to both retail and wholesale clients. CFDs are complex leveraged financial products traded over the counter (**OTC**) rather than on a central exchange.

We issue CFDs in respect of the following underlying asset:

Share CFDs	Cryptocurrency CFDs
Index CFDs	Treasury CFDs
Commodity CFDs	Foreign Exchange CFDs

GO Markets provides platform services to its clients, enabling them to trade the CFDs listed above. GO Markets does not authorise third parties to act as agents to provide the above financial products.

5. Product overview

A CFD is an agreement to exchange the difference in the value of an asset from the time the contract is opened until the time at which it's closed. A client does not take physical delivery of the underlying asset, and there is no exchange of one currency or underlying asset for another.

CFDs are subject to significant risks, including:

5.1 Leverage:

CFDs are leveraged products in which the money the client pays (the Margin) to GO Markets is typically less than the full-face value of the underlying instrument. As such, both gains and losses can be magnified. The Client should be prepared for the greater risks associated with this type of leveraged investment. Furthermore, Margin requirements can change rapidly due to changes in the market for the Underlying Instruments.

Risk of Close-out: Sufficient funds must always cover the total margin requirements. Failure to do so may result in the closure of some or all of the Clients' positions if the account balance falls below the close-out level.

5.2 Non-transferability:

When a trade is entered with us through the platform, Clients will enter into an off-exchange derivative that is non-transferable. This involves greater risk than investing in a financial instrument such as a share, which is transferable, or dealing in an exchange-traded derivative, because Clients' ability to open and close trades depends on the Platform's ability to accept and execute Client orders.

5.3 Market Volatility:

The prices of CFDs and the underlying assets may fluctuate rapidly and over wide ranges, reflecting unforeseeable events or changes in conditions, none of which can be controlled. The prices of CFDs will be influenced by, amongst other things, changing supply and demand relationships, governmental, agricultural, commercial and trade programs and policies, national and international political and economic events, and the prevailing psychological characteristics of the relevant marketplace.

5.4 Holding Costs:

Depending on the positions held and how long they are held for, a client may incur holding costs. In some cases, the sum of these holding costs may exceed any profits or significantly increase losses.

5.5 Cooling off period:

As there is no cooling-off period for CFDs, the client cannot cancel a trade once it has been entered.

5.6 Counterparty Risk:

GO Markets is the issuer of CFDs subject to this TMD. This means that the client is dealing with GO Markets as the counterparty to every transaction. Accordingly, the client is exposed to the financial and business risks of trading with GO Markets.

6. Investors for whom OTC Derivatives are unsuitable

Our products are not compatible with the needs of investors who:

- Are below the age of 18
- Reside in a country that prohibits trading in CFDs

- Does not understand CFD risks or does not have the requisite knowledge.
- Are seeking a regular guaranteed income or predictable returns
- Have a low risk tolerance, except when using CFDs to hedge existing investments.
- Have not passed GO's Client Qualification criteria
- Are not prepared or able to incur losses up to the total funds available in their retail CFD trading account
- Have low levels of financial literacy
- Intend to use income or cash that they rely on for day-to-day living expenses
- Are vulnerable for any of the following reasons:
 - experiencing elder abuse or financial abuse
 - experiencing a serious mental or physical health condition that affects decision-making capacity (including age-related cognitive impairment)
 - experiencing addiction that affects financial decision-making or mental capacity
 - unemployed or without other income, experiencing financial hardship, and having minimal or no savings
 - bankrupt, subject to insolvency administration, or having entered into a formal debt arrangement.

7. Target Market of OTC Derivatives

Given the diverse nature of CFDs and different strategies that may be associated with trading CFDs, GO Markets considers that the target market for CFDs includes classes of retail clients who satisfy each of the following criteria:

- Above the age of 18.
- With the requisite knowledge for trading in CFDs.
- Who can accept losses that can be as great as the sum of their deposits.
- Those who have high investment risk appetites.
- Those who have a short-term investment horizon.
- Those who 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).
- Gaining exposure to price movements of the underlying assets, where exposure to such underlying assets may not be otherwise readily available, or where such exposure is required at short notice.

8. How OTC Derivatives are likely to meet the target market's objectives, financial situation and needs

CFDs issued by GO Markets and their key attributes are likely to be consistent with the likely objectives, financial situation and needs of investors who belong to one (or more) of the following categories:

- **High Risk Tolerance Traders** - Clients seeking to make a profit via speculation, or
- **Diversification Seeking Investors** - Clients who may be seeking to diversify their investment portfolio and use CFDs trading for speculative or hedging purposes.
- **Risk Mitigation Investors** – Clients seeking to hedge potential risks from other investments in or exposures to Underlying Reference Instruments.

8.1 High Risk Tolerance Investors are Clients likely to have a higher risk appetite and who are seeking higher returns through riskier strategies and are prepared to suffer material losses (and able to withstand such losses).

- **Likely objectives:** Use existing assets to support leverage in order to seek higher returns with corresponding higher risk.
- **Likely financial situation:** Have a relatively high and regular disposable income and/or substantial holdings of spare capital available for trading CFDs. Are able to withstand losses from trading CFDs without causing distress or a material impact on living standards,
- **Likely needs:** Wish to use spare capital to make enhanced returns.

8.2 Diversification seeking clients who are likely seeking to diversify their investment portfolio and use CFDs trading for speculative or hedging purposes.

- **Likely objective:** To diversify their investment portfolio.
- **Likely financial situation:** Clients who have existing or upcoming investments or exposures they wish to hedge.
- **Likely needs:** Loss or profit protection from a hedging strategy.

8.3 Risk Mitigation Investors are Clients who may be more risk-averse than high-risk tolerance Investors looking to protect previous gains or mitigate against potential future losses.

- **Likely objectives:** Protect previous gains or mitigate against potential future losses and/or lower the cost of acquiring economic exposure to relevant underlying assets.
- **Likely financial situation:** Have existing or forthcoming investments or exposures that the Clients wish to hedge.
- **Likely needs:** Loss or profit protection.

9. How CFDs are likely to be consistent with the likely objectives, financial situation and needs of Consumers in the target market - s994B (8)

GO Markets expects that trading in CFDs will likely be consistent with the likely objectives, financial situation and needs of consumers who:

- Use existing assets to support leverage in order to seek higher returns with corresponding higher risk.
- Have a relatively high and regular disposable income and/or substantial holdings of spare capital available for trading CFDs.
- Wish to use spare capital to make enhanced returns.
- Protect previous gains or mitigate against potential future losses and/or lower the cost of acquiring an economic exposure to underlying assets.

- Have existing or forthcoming investments or exposure and wish to hedge and or protect losses or profits.

10. Distribution Conditions -s994B(5)(c), s994E (1), s994F (6)

Direct distribution of CFDs to Consumers by GO Markets will be in accordance with procedures GO Markets determines are reasonably likely to be within the target market.

GO Markets' distribution strategy will be consistent with the identified target market and will only occur in accordance with the suitability and understanding procedures specified by GO Markets.

GO Markets will take reasonable steps to ensure its marketing strategy targets only potential clients who fall within the identified target market.

Third-party distributors include Referrers or Affiliates who distribute CFDs (**Distributors**).

GO Markets will select the Distributors and distribution criteria depending on the medium to be used by such Distributors. This will allow GO Markets to determine who the target audience is and whether they are likely to be interested in and/or have prior experience trading CFDs. GO Markets will take reasonable steps to ensure that Distributors distribute CFDs to the identified target market.

GO Markets will consider approving Distributors who, on reasonable grounds, consider would distribute CFDs only within the target market Consumers.

Distributors will be required to notify GO Markets within 10 business days if they become aware of a significant CFD deal that is not consistent with the TMD.

No Distributor may release marketing materials without obtaining GO Markets' prior written consent. No third-party distributor is permitted to distribute CFDs issued by GO Markets to Clients unless GO Markets considers on reasonable grounds that relevant Clients are likely to be within the target market.

GO Markets' permitted distribution channels are as follows:

Distribution Channel	Permitted Channel
Direct channels through GO Markets	Yes
Affiliates/referral	Yes
Channels	Yes
Through Personal Advice	No
Through General Advice	Yes

11. Monitoring and reviewing the TMD -s994C, s994B(5)(f), (6) and (7)

GO Markets will review triggers or events:

- we become aware of a significant issuance or distribution of CFDs to Clients outside the target market that would reasonably suggest that the TMD is no longer appropriate
- material changes to the CFD product as a result of new or amended functionality, whereby the key attributes of CFDs are no longer consistent with the likely objectives, financial situation and needs of Clients in the target market
- material changes to law or regulation affecting CFDs that would reasonably suggest that the TMD is

no longer appropriate

- receipt of a product intervention power order from ASIC requiring GO Markets to cease distribution of the product to retail clients
- we become aware of a significant volume of complaints from Clients who are trading CFDs regarding the design and distribution conditions that would reasonably suggest that the TMD is no longer appropriate
- any other event or circumstance that would materially change a factor taken into account in making this TMD for CFDs
- where GO Markets has detected significant issues with the distribution of CFDs through monitoring our own day-to-day activities, or the monitoring and supervision of our Distributors
- review Triggers -s994B (5)(d).

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

12. Information collection and reporting requirements – Distributors -s994F (1) and (3)

As part of monitoring and reviewing of TMD to determine whether it is still appropriate, each Distributor must provide to GO Markets on an annual basis, within 15 business days of the end of each calendar year, the following:

- Client complaints data – nature of complaints and the number of complaints received.
- Client feedback (including regarding performance of the CFDs).
- 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.
- web analytics
- any other information that would affect the consistency of this TMD.

13. Contact Details

For more information about GO Markets' TMD, please contact:

Mail: Level 7, 447 Collins Street, Melbourne, 3000, Victoria, Australia

Phone: +61 3 8566 7680

Email: support@gomarkets.com

Web: www.gomarkets.com/au

14. Date of TMD

11 March 2026.

15. Right to amend the TMD

GO Markets reserves the right to amend the TMD at any time where changes in law, regulation, regulatory guidance, or any other proper basis make amendment necessary.