

TARGET MARKET DETERMINATION

OTC Crypto Derivatives

Echuca Trading Pty Ltd

ABN 79 115 459 124 AFSL number 297499

Date: 17 October 2025

Product	Over-the-Counter Crypto Derivatives
Issuer	Echuca Trading Pty Ltd ABN 79 115 459 124, AFSL number 297499 (Echuca Trading, we , us or our)
Version Number	1.0
Date Made	17 October 2025
Last Review Date	N/A
Ceased date	In Use

Introduction

1. The purpose of this Target Market Determination (**TMD**) is to describe the target market of the OTC Crypto Derivatives issued by Echuca Trading, and to meet our design and distribution obligations (**DDO**) as required under section 994B in Part 7.8A of the *Corporations Act 2001* (Cth) (**Corporations Act**).
2. This TMD applies to retail clients only (**Clients** or **you**) and does not apply to wholesale clients (including sophisticated and professional investors).
3. This TMD has been specifically prepared in relation to our OTC Crypto Derivative products, which are leveraged, over-the-counter (**OTC**) derivatives referencing crypto-assets as the underlying instrument (**Products**). These Products are complex and high-risk and are not suitable for all retail clients.
4. Please note, this TMD is not:
 - 4.1 a Product Disclosure Statement (**PDS**);
 - 4.2 Financial Services Guide (**FSG**); or
 - 4.3 our terms & conditions (**Ts&Cs**),and it does not consider any person's individual objectives, financial situation or needs, nor does it constitute financial advice. Clients should refer to our PDS, FSG and Ts&Cs at www.kucoin.com/en-au as well as any other relevant Echuca Trading documents, to ensure they fully understand the risks involved, and consider seeking independent advice before deciding to engage in CFD trading.
5. This TMD aims to provide Clients, distributors, and related individuals and businesses with an understanding of the class of consumers for which the Products have been designed. In preparing this TMD we have had regard to the likely objectives, financial situation and needs of our target market, which includes Clients with a high-risk tolerance and experience in trading derivatives. This TMD sets out the following matters:
 - 5.1 the class of Clients that constitute our target market for the Products (**Target Market**), being the class of Clients for whom the Products are suitable, as well as the classes of consumers that are automatically excluded from the Target Market.

- 5.2 the conditions and restrictions applicable to the retail distribution of our Products (**Distribution Conditions**).
 - 5.3 the events and circumstances that would reasonably suggest that this TMD is no longer appropriate (**Review Triggers**); and
 - 5.4 the reporting obligations for distributors under the TMD.
6. Capitalised terms not defined in this TMD have the same meaning as in our Ts&Cs or the *ASIC Corporations (Product Intervention order – Contract for Difference) Instrument 2020/986 (CFD PIO)*, unless otherwise stated.

Overview of our Product

7. Our Products are leveraged, OTC derivative contracts that enable investors to trade on the price movement of underlying crypto-assets. These derivatives are entered into via our trading platform and are settled in crypto-assets. The Products allow Clients to gain exposure to the difference in the value of an underlying asset from the time a position is opened until the time that such position is closed. A position is opened and closed by purchasing and selling the OTC Crypto derivative. At no stage does the Client take delivery of the underlying crypto-asset, and at no time is there an exchange of one currency or underlying crypto-asset for another. Through the Products, Clients can take a position on the price movement of a referenced crypto-asset without having to acquire ownership rights in any underlying asset.
8. Echuca Trading issues OTC Crypto Derivatives that reference crypto-assets as the underlying instrument. Crypto-assets are typically highly volatile and may include, but are not limited to, bitcoin, ether, and other crypto-assets that meet our liquidity provider's listing criteria.
9. We treat our Products as CFDs under the CFD PIO and apply the protections provided for in the CFD PIO including leverage ratio limits, margin close-out and negative balance protection. However, our products do not meet the definition of CFDs in the CFD PIO because they are settled in crypto-assets, typically stablecoins. CFDs are complex products that are subject to significant risks which include, but are not limited to:
- 9.1 (**Leverage**) CFDs are leveraged instruments, meaning the initial margin required to open a position is lower than the notional value of the underlying crypto-asset. This leverage amplifies both potential gains and losses. Clients may be required to post additional margin

(i.e., deposit additional funds) at short notice due to market volatility to sustain the open contract.

- 9.2 **(Loss of investment)** Clients may lose more than their initial margin. While Negative Balance Protection limits the Client's maximum losses to the account equity, Clients should be aware that rapid market movements can result in substantial losses.
- 9.3 **(Volatility)** Markets for crypto-assets are subject to high volatility, often driven by speculative trading, regulatory developments, technological changes, and macroeconomic factors. These often unpredictable events can result in rapid price movements, affecting the pricing and execution of CFDs. In addition, the value of crypto-assets that you hold in your KuCoin account as margin will also be subject to high volatility which may exacerbate these features and cause significant losses due to market volatility.
- 9.4 **(Margining)** Clients must maintain sufficient margin to keep CFD positions open. The Client will be required to hold enough crypto-assets in their KuCoin account as margin for any existing and new positions and must continue to monitor their margin requirements for any open positions. Failure to meet the margin requirements of an open position may result in automatic liquidation of positions (potentially crystallising losses).
- 9.5 **(No Ownership)** CFDs do not grant ownership rights or any other interests in the underlying reference assets. When Clients open CFD positions, they are not buying the underlying assets, but rather merely speculating on the change in the value of that reference asset.
- 9.6 **(Holding fees)** Depending on the positions held by the Client, as well as how long they are held for, the Client may incur holdings costs, and in some cases, the sum of these holding costs may exceed the amount of any profits, or they could significantly increase any losses.
- 9.7 **(Counterparty risk)** The Client will be dealing with Echuca Trading as the counterparty to each transaction involving the Products and will therefore be exposed to the financial and business risks of trading with Echuca Trading.
- 9.8 **(Cooling off)** CFDs are not subject to cooling-off periods. Once a position has been opened, it remains active until closed by the Client or liquidated due to insufficient margin.

9.9 **(Fixed term)** CFDs do not have a fixed maturity date. Clients must actively monitor and manage their positions. The Products are not suitable for passive investment strategies.

10. For further information in relation to the Products, including detailed risk disclosures and product specifications, please refer to our PDS.

Target Market Methodology

11. In this section we explain the methodology used to formulate the Target Market.
12. We consider the relevant objectives, financial situation and needs of consumers (**Client Attribute**) and whether it corresponds with a key attribute of our Products (**Product Attribute**).
13. We consider that the degree to which Client Attributes and Product Attributes overlap is indicative of whether a Client is in the Target Market. The table provided below explains whether a particular Client Attribute is befitting of a Client in the Target Market (**Target Market Indicator**).
14. Clients are considered **within the Target Market** if their Client Attributes correspond with the Product Attributes for the Target Market Indicators. However:
- 14.1 satisfying one Client Attribute (i.e., the Client Attribute matches the Product Attribute for the particular Target Market Indicator) does not mean a Client is considered within the Target Market; and
- 14.2 if one or more of the Client Attributes suitable to a Client in the Target Market are **not** satisfied, then a Client is **not within the Target Market**.
15. Being within the Target Market does not mean that the Products offered by us are suitable for you. You must refer to our disclosure documents and you may also wish to consult your professional advisers before deciding whether our Products are suitable for you in light of your personal circumstances and financial objectives.

Target Market

Target Market Indicator	Product Attribute	Client Attribute
Investment Objective	<p>Our products are leveraged CFDs that reference crypto-assets as the underlying instrument.</p> <p>The prices of crypto-assets are volatile and subject to rapid and often unpredictable price movements, especially when compared to the prices of traditional financial assets, such as shares. The leveraged nature of the Products magnifies both potential gains and losses, meaning that even small movements in the price of the underlying crypto-asset can result in significant financial gains or losses. These Products are designed for retail clients whose investment objective is significant short-term gains through active trading and speculation. The Products do not provide income, capital preservation, or long-term growth features. They are not suitable for clients seeking passive exposure to crypto-assets or traditional investment outcomes.</p>	<p>Suitable for retail clients whose investment objectives are to pursue significant short-term gains through speculative trading strategies.</p> <p>Clients who are within the Target Market are not seeking regular income, capital preservation, portfolio stability, or long-term wealth accumulation.</p>
Investment Risk Appetite	Leveraged CFDs are inherently risky and complex financial instruments.	Clients with a very high risk appetite may be appropriate for the Target Market.

The prices of crypto-assets are volatile and subject to rapid and often unpredictable price movements, especially when compared to the prices of traditional financial assets, such as shares. The leveraged nature of the Products magnifies both potential gains and losses, meaning that even small movements in the price of the underlying crypto-asset can result in significant financial gains or losses.

Crypto-assets are a novel and evolving asset class, and are subject to heightened regulatory uncertainty. Changes to taxation, financial services laws, or other applicable regulations may materially affect the value or legality of certain crypto-assets. Regulatory developments may vary across jurisdictions and can occur with limited notice.

Additionally, custody risks are also present when a counterparty holds crypto-assets as collateral for OTC derivatives positions. In a lot of cases, a client does not have legal recourse to any lost or stolen assets if the crypto-assets were subject to a breach or hacking event.

and experience	<p>Products are complex, sophisticated and high-risk financial products. This is especially the case for leverage CFDs that reference crypto-assets as the underlying instruments. These Products are suitable for Clients with experience in trading similar financial instruments.</p> <p>When a Client starts the Account opening process with us, they will be required to undertake a client suitability assessment or equivalent quiz (Client Suitability Assessment) which assesses their trading objectives, income streams, employment history and basic knowledge.</p> <p>Echuca Trading uses an Account Questionnaire to assess your trading objectives, income stream, employment history and relevant personal circumstances.</p> <p>Echuca Trading will also use the Client Suitability Assessment to assess whether a Client has knowledge of the features and risks of trading CFDs referencing crypto-assets to assist us to determine whether you have the knowledge and experience to trade our Products.</p> <p>However, Echuca Trading will not provide you with personal advice and our Client Suitability</p>	<p>qualification criteria following completion of a Client Suitability Assessment to be initially considered in the Target Market.</p> <p>If the Client does not meet the minimum qualification criteria based on the results of a Client Suitability Assessment, Echuca Trading may choose to not open or may suspend the Client's account. If a Client does not meet the minimum qualification criteria, they can visit our website for useful publications to assist in learning about our Products, the risks associated with them, and trading generally, in CFDs (amongst other information). Clients may re-take the Client Suitability Assessment a limited number of times.</p> <p>Clients are only allowed access to 2:1 leverage. Wholesale clients, on the other hand, are entitled to access greater than 2:1 leverage.</p> <p>Clients who do not have a sufficient understanding of derivative trading, leverage, and crypto-asset volatility will not be considered within the Target Market.</p>
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	<p>Assessment us is not designed to determine whether the Products are suitable to your individual circumstances and financial objectives.</p>	
Financial Situation	<p>As mentioned above, CFDs, particularly those referencing crypto-assets as the underlying asset, are leveraged, complex, sophisticated and high-risk financial products and may result in losses larger than the Client's initial investment. Clients must be financially capable of absorbing losses without experiencing financial hardship or distress.</p>	<p>Clients in the Target Market must have a very high tolerance to losses that may emerge from trading in CFDs. Clients with a high tolerance to losses may be able to appropriately trade CFDs by executing certain orders (such as stop loss orders).</p> <p>Clients who have a medium, low or no tolerance to losses (where losses cause financial distress) fall outside the Target Market. Clients must have sufficient disposable income or liquid assets to withstand adverse market movements without compromising their financial stability.</p>
Exposure to Crypto-assets market	<p>Currently, our CFDs only reference crypto-assets as the underlying instrument. The Products are suitable for clients seeking synthetic exposure to price movements in crypto-assets without owning the underlying crypto-asset.</p>	<p>Clients are situated in the Target Market if they are seeking exposure to crypto-assets markets.</p> <p>If Clients are not seeking exposure to crypto-assets markets, they are not in the Target Market. Clients who are not familiar with or do not wish to engage with the crypto-asset sector are not in the Target Market.</p>

Investment portfolio	The CFD is intended for use as one component, or a minor or satellite allocation, of a Client's investible assets. The Products are not designed to form the core or majority allocation of a diversified investment portfolio, and should be used as part of a broader, actively managed investment strategy.	Clients are not in the Target Market if the Client's investable assets are intended to be held as a stand-alone or core component of an investment portfolio.
Monitoring Trades	There may be significant price fluctuations affecting trades on account of the price volatility of crypto-assets, which may be amplified by leverage and movement in the value of your underlying crypto-asset margin which you hold to maintain your position. Due to the potential for rapid and material changes in position and margin value, the Products require active monitoring to manage risk, avoid automatic liquidation and significant losses.	Echuca Trading considers that the Clients in the Target Market should monitor their positions on a daily basis. Clients who monitor their trades infrequently, for instance on a monthly or yearly basis are not considered to be in the Target Market. Clients must be willing and able to actively monitor their trading positions and account status, including margin requirements, on a regular basis.
Investment timeframe	Due to the volatility and leverage of the Products, they are not intended for use as a long term investment. The Products are designed for short-term trading strategies and are not suitable for buy-and-hold investors.	CFDs are likely suitable for clients who have a short-term investment horizon. CFDs are unsuitable for Clients who seek longer investment timeframes due to the volatility, leverage, potential for capital loss, holding costs and short-term nature of CFDs. Clients intending to hold positions for extended periods or who prefer infrequent trading activity are not in the Target Market.

Target Market Client Attributes

16. The likely objectives, financial situation and needs of a Client in the Target Market are Clients:

16.1 who are speculating or seeking high returns in the prospect of realising significant gains. These Clients may have a capital growth mindset and must be willing to tolerate potential losses that can emerge from investing in the Products;

16.2 with a very high risk appetite, or those who are trading CFDs for the sole purpose of hedging against risk of existing crypto-asset investments;

16.3 who have the knowledge and experience necessary to understand how the CFDs work, and to understand that the CFDs are high risk. This includes an understanding:

(a) that the Client is speculating on the change in the value of a particular asset;

(b) that the Client is not buying the underlying asset; and

(c) of the concepts of leverage and margin calls;

16.4 that meet the minimum qualification criteria for the Client Suitability Assessment which takes into account a Client's trading objectives, income streams, employment history and basic knowledge;

16.5 with a very high tolerance to losses that may emerge from trading in CFDs. This includes the ability to lose all of the crypto-asset collateral held in your KuCoin account without suffering financial hardship. Clients in the Target Market should have a reasonable amount of disposable income and/or disposable savings. Clients must be financially resilient and capable of absorbing trading losses without compromising their financial stability;

16.6 who are seeking exposure to the crypto-assets markets;

16.7 who intend to use CFDs as one component, or a minor or satellite allocation of a Client's investible assets. Clients should not intend to use the Products as a core or stand-alone investment strategy;

16.8 who intend to monitor their trades on a weekly basis (minimum), including having the time and energy to do so. Clients must be willing

and able to actively monitor their trading positions and account status on a regular basis;

16.9 who have a short-term investment horizon; and

16.10 who do not have the following trading objectives:

- (a) capital appreciation (long-term growth);
- (b) capital preservation (safe investment); or
- (c) cash flow (an ongoing source of income).

Clients Automatically Excluded from the Target Market

17. Echuca Trading recognises that trading the Products is not suitable for everyone. A Client will be unsuitable for trading in the Products and will be automatically excluded from the Target Market if the Client:

17.1 is under 18 years of age or above 70 years old; or

17.2 is suffering a vulnerability (for instance, mental illness, cognitive impairment, family violence, disability or gambling addiction or other financial hardship) or is undischarged bankrupt;

17.3 cannot afford to lose the amount of money they deposit without a material impact on their standard of living and/or financial stability;

17.4 does not understand the features and risks of OTC derivatives and CFDs, including leverage, margin calls, counterparty risk, and the inherent risks associated with crypto-assets;

17.5 only derives income from benefits and borrowings;

17.6 does not pass any qualification or other onboarding testing criteria, including the Client Suitability Assessment;

17.7 has medium or low risk tolerance, other than those investors who wish to use CFDs to hedge existing crypto-asset investments;

17.8 seeks guaranteed capital protection or stability;

17.9 seeks regular or otherwise predictable returns on their investments;

17.10 has low levels of financial literacy; or

17.11 is unemployed or has recently experienced job loss and is unable to meet their day-to-day financial needs.

18. Consumers who fall into any of the categories set out immediately above are not in the Target Market for the Products issued by Echuca Trading.

Distribution Conditions and Restrictions

19. Any distribution of CFDs issued by Echuca Trading will be in accordance with procedures that we determine are reasonably likely to ensure that our CFDs are distributed to Clients who are reasonably likely to fall within our Target Market.
20. Echuca Trading is the issuer and main distributor of the Products. Echuca Trading will mainly distribute the Products directly through the trading platform.
21. In future, we might engage one or more intermediaries as our authorised representatives. These authorised representatives will help facilitate the distribution of the Products that this document is relevant for, for example, by arranging for a prospective Client in the Target Market to access the trading platform and deal in the Products directly with us.
22. The Products will be marketed and advertised to prospective Clients in the Target Market through the trading platform, our website, webpages and social media pages.
23. We may also engage third parties to advertise the Products on third-party website, webpages, social media pages, publications and television. However, given the very high risk nature of the Products, Echuca Trading will not engage in mass marketing to consumers who fall outside the Target Market.
24. We have established Distribution Conditions for our Products so they are directed to Clients in the Target Market. These Distribution Conditions apply to us, our authorised representatives who distribute the Products and to third-party marketing. The Distribution Conditions are as follows:
 - 24.1 Based on historical customer data, we determine whether a prospective Client would fall within the Target Market of a Product during the onboarding process.

24.2 The distribution of Products will be restricted to Clients who have been asked to, and have passed, the Client Suitability Assessment. The Client Suitability Assessment will assess (amongst other matters) the Client's:

- (a) knowledge and experience in relation to CFDs (and trading) including an understanding of concepts of leverage, margin, and volatility;
- (b) interest and knowledge in crypto-assets markets;
- (c) financial status;
- (d) risk appetite; and
- (e) investment objectives.

24.3 The Client Suitability Assessment has the following features:

- (a) questions that effectively assess against each Target Market Indicator identified above;
- (b) contains 'knock out' questions, for which if a prospective client provides a response that would indicate that they are not likely to be in the Target Market, they will be immediately excluded from the onboarding process;
- (c) contains questions drawn from a large pool of carefully designed questions to avoid potential gaming of the questionnaire;
- (d) lock-out periods apply which prevent prospective clients from re-attempting the questionnaire in a defined time period if unsuccessful; and
- (e) caps on unsuccessful attempts restricting the number of times a prospective client may attempt the questionnaire and the frequency of attempts within a defined time period.

24.4 We may also restrict the Client's use of their account (and access to the Products) where they are failing to meet margin requirements, as this may indicate that the Products are not appropriate for the Client's financial situation.

25. Echuca Trading maintains a robust system for ongoing monitoring and review to ensure continued alignment with the Target Market. Ongoing monitoring systems are designed to detect material changes in Client's circumstances. If such changes are indeed identified, and our products are

deemed no longer suitable to certain Clients, appropriate procedures will be initiated to ensure Echuca Trading does not provide its products to these Clients. Our monitoring includes, but is not limited to the following:

- 25.1 regular monitoring of trading data including sales volumes and Client losses;
 - 25.2 regular monitoring of account opening data, Client Suitability Assessments, and website analytics;
 - 25.3 regular monitoring of key departments' operations;
 - 25.4 client communication and feedback reviews; or
 - 25.5 regular compliance audits.
26. Echuca Trading implements reasonable steps to ensure that our marketing strategy is only targeting Clients within our Target Market and adhering to all applicable laws and regulations. Regular reviews of marketing materials and campaigns are also undertaken to identify and address any potential issues promptly.
27. Training is also pivotal to the Echuca Trading onboarding process. Training covers the identification and response to potential unsuitability or vulnerabilities of Clients, and is updated in case of relevant regulatory changes. Training is conducted on a regular and operational basis.

Reviewing the TMD

28. The Review Triggers identified below are consistently reviewed and approved by the Echuca Trading Board of Directors. The Board of Directors retains oversight over the suitability of the TMD through its quarterly review of complaints received by Echuca Trading for the Products covered by this TMD. We will review this TMD in accordance with the table below:

Reviewing the TMD	
Initial Review	The initial review of this TMD will occur no later than 6 months from the commencement date of this TMD.
Periodic Review	Subsequent reviews of the TMD will occur every 12 months, or more frequently if a Review Trigger occurs.

External Review Echuca Trading will engage an external law firm to review the controls and processes whenever there is a significant change to our product offerings or applicable regulatory requirements.

Review Triggers Echuca Trading will review this TMD within 10 business days if a Review Trigger occurs. These Review Triggers include (but are not limited to):

- receipt of more than 6 Client complaints that indicate issues related to the distribution of the Products, client suitability and/or understanding of the Products, within any 2-month period either through our internal dispute resolution (**IDR**) channel or external dispute resolution (**EDR**) channel;
 - there is a 15% or greater increase of complaint rate in a single calendar month, compared to the average monthly rate of complaints of the three preceding calendar months. For example, if on a monthly average from January to March, Echuca Trading receives 3 complaints from Clients, then a review will be triggered if it receives 4 complaints in April;
 - any Client complaint that is of a serious nature or with a substantial monetary value, regardless of the number of these Client complaints;
 - regular reviews of Client data including the frequency, value and time period of losses throughout the life cycle of the products reasonably suggest that the TMD is no longer appropriate for the Target Market;
 - there are material changes to the Products (or new product offerings for Clients);
 - there is a material change with respect to the PDS, FSG or Ts&Cs;
 - there is a material change with respect to the Distribution Conditions for the Products;
 - there are material changes to laws and regulatory guidance affecting the Products;
 - legal or regulatory action commenced against Echuca Trading concerning the Products offered under this TMD;
 - in excess of 30% of Clients' accounts are liquidated for failing to comply with the maintenance margin requirement within a period of 2 months;
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- in excess of 15% of Clients' with active trades do not log into their accounts (via the App or website) in the past 7 days (i.e. failing to monitor their trades);
 - Echuca Trading becomes aware of significant dealings of the Products outside the Target Market;
 - adverse findings arising from an external auditor or independent review in relation to the Products covered by this TMD; or
 - another event or circumstance that could materially change a factor taken into account in making this TMD.

Unless the TMD has been reviewed and, if necessary, a new TMD issued within 10 business days of a Review Trigger having occurred, or when another event or circumstance suggests that the TMD is no longer appropriate, Echuca Trading must remove the Products from the market and direct distributors to stop distributing the Products as soon as practically within those 10 business days.

Information Reporting

29. The following schedule sets out the information which we require to be reported to us in respect of the Product by persons who engage in retail distribution of the Products.
30. Unless expressly stated to the contrary, the first reporting period commences on the commencement date of this TMD and each subsequent reporting period commences at the end of the prior reporting period.

Information required to be reported	Personnel required to report	Reporting frequency	Form of report
Number of: • IDR; and • EDR complaints received in relation to the Products during the reporting period	Echuca Trading Compliance Analyst	Recurring every 2 months	By email to the Echuca Trading Compliance Officer and the Board of Directors

relating to the suitability of the Products

Number of Client accounts that are liquidated on account of the failure to comply with the margin requirements	Echuca Trading Compliance Analyst	Recurring every 2 months
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Percentage of Clients with active trades or positions logging into the trading platform at least every 7 days	Echuca Trading Compliance Analyst	Recurring weekly
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Material change(s) made to any of the following:	Personnel that makes the relevant change	As soon as is reasonably practicable considering the nature and extent of the change
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- Products;
- PDS;
- FSG;
- Echuca Trading T&Cs; or
- Distribution Conditions

Change in Personal Circumstances

32. It is the responsibility of the Client to inform Echuca Trading of any changes to their personal or financial circumstances which may reasonably be expected to affect their suitability to invest in and use the Products as per this TMD.

33. Clients must notify Echuca Trading of such changes by contacting our Customer Support Team , using the following details:

Telephone: 02 9048 9116

Email: support@echucatrading.com.au

Mail: Level 15, 60 Margaret Street, Sydney NSW 2000