

TARGET MARKET DETERMINATION (TMD)

TMD Version: 1.0

Product

RETAIL ACCESS STRUCTURED INVESTMENT – DIGITAL AD CAMPAIGN SERIES

Issuer

CAPITAL GUARD AU PTY LTD

(ABN: 48 168 216 742, AFS Licence No. 498434)

Authorised Representative & Distributor

WORLDWIDEBANNERS PTY LTD

(ABN: 97682642735, Authorised Representative No. 1314512)

Effective Date: 5th of May 2025

Next Review Date: 5th of May 2026

1. PRODUCT DESCRIPTION

This is a **structured financial product** that provides contingent returns based on the performance of digital advertising campaigns run by major third-party technology platforms (e.g. Google, Meta, Amazon). Returns are linked to performance indicators such as ROAS, CTR, or CPA. The product is **capital-at-risk**, has a **fixed term** (3–12 months), and is **not liquid**. It is only available via application and suitability assessment through authorised representatives or AFSL holders.

2. TARGET MARKET SUMMARY

This product is intended for:

Client Type	Description
Retail Clients	Must receive personal advice and complete an Appropriateness Test
Wholesale Clients	Qualify under s761G of the Corporations Act
Professional Investors	Regulated entities such as licensees, super funds, APRA entities, etc.

3. TARGET MARKET CHARACTERISTICS

3.1. Client Objectives and Needs

This product is suitable for investors who:

- Seek **non-market correlated returns**
- Are interested in **alternative investment exposure**
- Accept **performance-based returns** (not fixed interest)
- Do **not require liquidity** before maturity
- Want **short- to medium-term exposure** (3–12 months)

3.2. Financial Situation

This product is designed for clients who:

- Can afford to **lose some or all of their invested capital**
- Do **not rely on the investment** for regular income
- Have sufficient financial stability to withstand a **full loss scenario**

3.3. Risk Profile

The product is suitable for **high-risk-tolerant investors** who:

- Understand complex products or structured investments
- Are aware of operational, data, and counterparty risks
- Can evaluate investment-specific disclosures with assistance

4. RETAIL CLIENT DISTRIBUTION CONDITIONS

Condition	Detail
Advice Model	Must be distributed under personal advice only
Appropriateness Test	Required – must include risk, liquidity, experience, and affordability
Statement of Advice (SoA)	Mandatory for all retail investors
Risk Acknowledgement Form	Must be signed before acceptance
Cooling-Off Period	14 calendar days (unless already deployed)

5. DISTRIBUTION CHANNELS

This product may only be distributed through:

- AFSL holders, or
- Authorised representatives of AFSL holders (e.g., Worldwidebanners Pty Ltd)

Channels include:

- Direct personal advice (face-to-face or online)
- Approved advisers using Capital Guard or AR onboarding flows

It must not be distributed:

- Via general advice models
- On execution-only platforms
- Through unsolicited promotion or social media without advice

6. DISTRIBUTION CONDITIONS - WHOLESALE AND PROFESSIONAL INVESTORS

For wholesale/professional clients:

- A signed accountant's certificate or investor declaration is required
- No personal advice is required
- Appropriateness tests are **optional**, but risk acknowledgment is recommended

7. DISTRIBUTION CONDITIONS - WHOLESALE AND PROFESSIONAL INVESTORS

The product is **not suitable** for clients who:

- Require regular income or capital stability
- Have low or medium risk tolerance
- Require liquidity or access to capital during the investment term
- Do not understand or accept structured product risks
- Have not received personal advice (if retail)

8. CLIENT RISK MATRIX

Client Profile	Risk Tolerance	Liquidity Needs	Investment Knowledge	Product Suitability
Conservative, income- seeking retiree	Low	High	Low	Not suitable
Balanced investor with medium-term goals	Medium	Medium	Moderate	Not suitable
High-risk investor, speculative funds	High	Low	High	Suitable
Wholesale investor with 250K income	High	Low	Moderate/High	Suitable
Institutional investor (AFSL holder)	High	Low	High	Suitable

9. REVIEW TRIGGERS

This TMD must be reviewed **immediately** if:

- ASIC raises a concern about mis-selling or consumer harm
- Product performance fails or defaults occur
- Changes in law or AFSL conditions occur
- Significant complaints or loss rates are reported
- A material change is made to product structure or offer terms

10. REVIEW SCHEDULE

Activity	Timing
Initial Review	25 th of May 2026
Periodic Review	Annually, or sooner if a trigger occurs
Event Based Review	Within 10 business days of a review trigger

11. REPORTING REQUIREMENTS FOR DISTRIBUTORS

Worldwidebanners Pty Ltd and other distributors must:

- Report any complaints about this product within 10 business days
- Notify Capital Guard of significant dealing outside of the target market
- Submit quarterly reports on advice process outcomes (e.g. pass rates on appropriateness tests)
- Retain documentation for 7 years to support compliance

12. DISCLAIMER

This TMD is not a Product Disclosure Statement (PDS) and is not intended to provide financial advice. It is intended to comply with **the Design and Distribution Obligations (DDO)** as per **Part 7.8A of the Corporations Act 2001**. Investors should read the PDS in full and seek professional advice.