

Target Market Determination

This document is a target market determination (“TMD”) for the purposes of section 994B of the *Corporations Act 2001* (Cth).

This TMD is made by Cuscal Limited ABN 95 087 822 455 Australian Financial Services Licence 244116 (the “Issuer”), the issuer of the product covered by this TMD (the “Product”).

This TMD was made or last updated on 17 September 2021.

1. Product

Name of the Product: ZAAP

Type of Product: Reloadable Mastercard Pocket Money Card

Features of the Product:

- Reloadable card, topped up by parents using a linked credit or debit card.
- Accompanying ZAAP-branded app for parents and children
- Savings feature allowing teens and tweens (children 6 to 18 years old) to set and track progress against a savings goal.
- Merchant blocking.
- Stocked range of cards and ability to design your own card.
- Wearable payment device optional.

2. Target market

The retail clients who comprise the target market for the Product are:

- Families with school age children who pay or would like to pay their children pocket money.

The likely objectives, financial situation and needs of consumers in the target market for the Product are as follows:

- Objectives: To teach their children sound financial literacy skills and to have a simple way to administer pocket money to their children.
- Financial situation: Sufficient funds available to pay pocket money to children.
- Needs: A cost effective reloadable card product which can meet their objectives.

The Product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market for the following reasons:

- ZAAP has been designed with families in mind and helping them achieve the objectives stated above, including:
 - Separate parent and child app access to view child's spending.
 - Ability to set regular pocket money payments and ad hoc payments to children.
 - Blocking of inappropriate merchants, such as gambling, liquor and adult sites.
 - Card designs and card design capability suited to school age children.
 - Low cost solution for families.

- Caters for families with multiple children.

3. Retail product distribution conduct

The conditions and restrictions on retail distribution of the Product (other than any imposed by the Corporations Act) are as follows:

- Corporate Prepaid Cards Pty Ltd ABN 092 828 772 AFSL 509642 (the “Distributor”) is the sole distributor of the Product;
- the Distributor must not provide information to consumers about the Product that is inconsistent with the information in the Product Disclosure Statement for the Product;
- the Distributor must not give financial product about the Product other than general advice about the Product contained in marketing materials;
- the Distributor must not do anything on the Issuer’s behalf other than marketing, arranging for the issue of, and providing customer services for the Product; and
- the Product is to be sold by the Distributor exclusively through the ZAAP.com.au website targeting parents of school age children.

These distribution conditions will make it likely that the consumers who acquire the Product are in the target market, for the following reasons:

- The restrictions on information and advice about the Product will help to ensure that persons who are not in the target market will not seek to acquire the Product.
- Only parents / families looking for a solution like ZAAP will visit the website or respond to targeting marketing materials and proceed with online purchase if they determine the product is suitable for their family.

4. When the TMD may no longer be appropriate

The events or circumstances that would reasonably suggest that the TMD is no longer appropriate (a “Review Trigger”) are:

- Material changes to the design or distribution of the Product, including related documentation.
- Occurrence of a significant dealing, such as the distribution of, the Product outside the parameters of the TMD.
- Distribution conditions found to be inadequate.
- Change in legal or regulatory requirements.
- Adverse audit findings.
- External events such as adverse media coverage or regulatory attention.
- Significant changes in metrics, including, but not limited to complaints in any 3-month period.

5. TMD review period

After the TMD is made, the first review of the TMD will be made within 12 months.

After the first review of the TMD, each following review of the TMD will be made within 12 months.

The Issuer will also review the TMD if a Review Trigger has occurred or if any other event or circumstance has occurred that would reasonably suggest that the TMD is no longer appropriate, and the Issuer knows about this event or circumstance. The Issuer will review the TMD within 10 business days after it first knows about the event or circumstance.

6. Complaints reporting period

The reporting period for the reporting of information by the Distributor about the number of complaints about the Product is quarterly, but the Distributor must also report any material change in complaints to the Issuer as soon as practicable.

7. Information needed

The Issuer needs the information set out below to identify promptly whether a Review Trigger for the TMD has occurred or whether another event or circumstance has occurred that would reasonably suggest that the TMD is no longer appropriate:

| Information needed | Volume |
|---------------------------|-------------------------------------------------------------|
| Complaints | Receipt of a material number of complaints. |
| Product feedback | Receipt of feedback about its features from customers. |
| Audit results | Adverse audit findings by external auditors |
| AML/CTF Policy | Any material changes to the AML / CTF policy of the Issuer. |

The Distributor must provide information about complaints and product feedback to the Issuer. This information must be provided on a quarterly basis, but the Distributor must also report any material increase in complaints to the Issuer as soon as practicable.