

**TARGET MARKET DETERMINATION**  
**FOR THE PELIKIN VISA PREPAID CARD**

*Issued by Nium Pty Limited*  
*Updated June 19, 2024*

## ABOUT THIS DOCUMENT

<b>Start Date:</b>	13 December 2021
<b>Updated:</b>	19 June 2024
<b>Version:</b>	2.0
<b>Review Frequency:</b>	Annually
<b>Product(s):</b>	Visa Prepaid Card ("Card")
<b>Issuer of the Product(s):</b>	Nium Pty Limited ACN 601 384 025 ("Nium") Australian Financial Services Licence Number 464627
<b>Distributor of the Product(s):</b>	Pelikin Holdings Limited (ABN 90 161 348 983) ("Pelikin") Authorised Representative of Nium under Authorised Representative Number 001289284

## BACKGROUND

This Target Market Determination ("TMD") applies to the Cards and the associated Nium Accounts (collectively, the "Services"), which are non-cash payment products issued by Nium to retail clients.

It sets out the target market for the product, information about distribution conditions and the triggers for the review of this TMD. This TMD is not a Product Disclosure Statement ("PDS") nor a summary of the terms and conditions of the Services. Please read the PDS along with the Terms and Conditions (available at [www.pelikin.co](http://www.pelikin.co)) before making a decision to acquire the product.

This TMD only applies to retail non-cash payment products, meaning it only applies where these products are issued to retail customers (as defined under the Corporations Act 2001 (Cth)). It does not apply to products Nium issues to wholesale clients.

Capitalised terms not defined in this TMD have the meaning given to them in the PDS (available at [www.pelikin.co](http://www.pelikin.co)).

## ABOUT THE PRODUCT

The following are the key attributes of the Card:

- It is a Visa Prepaid card (and not a credit or charge card).
- It provides customers with the means to securely obtain a virtual or physical card for travel spending, that is easily renewable.
- It provides customers with the means to make payments for goods and services or make cash withdrawals anywhere in the world where Visa Prepaid cards are accepted.
- It reduces the need for customers to carry cash.
- It is funded from the Available Balance, meaning it is a payment facility that is preloaded (and can be reloaded) with funds by transferring funds into the Nium Account (as described in the PDS).

The Card (and its key attributes) is likely to be consistent with the likely objectives, financial situations and needs of the customers described in this TMD because:

- It provides the ability for cardholders to make purchases and cash withdrawals in a secure way.
- It can be used within Australia or overseas anywhere Visa Prepaid cards are accepted.

## CLASS OF RETAIL CUSTOMERS THAT COMPRISE THE TARGET MARKET

Product	Target market
<p><b>Card</b></p>	<p>The Card is targeted at and designed for customers aged between 18 to 35 who intend to travel overseas and require a travel money service to allow them to access and spend their funds whilst overseas.</p> <p>The customer must meet the following minimum eligibility criteria to acquire the product:</p> <ul style="list-style-type: none"> <li>• Be an individual</li> <li>• Be at least 18 years old and a resident of Australia</li> </ul> <p><b>Likely Objectives:</b></p> <ul style="list-style-type: none"> <li>• A convenient preload (and reload) prepaid card solution that allows for travellers to easily manage and spend their money (in foreign currencies) whilst they are travelling overseas, via an easy-to-use mobile application interface.</li> </ul> <p><b>Likely financial situation:</b></p> <ul style="list-style-type: none"> <li>• Sufficient cash flow and financial resources to preload (and reload) the Card, without the need for credit.</li> <li>• Sufficient cash flow and financial resources to pay any fees associated with the use of the Card as described in the PDS.</li> </ul> <p><b>Likely needs:</b></p> <ul style="list-style-type: none"> <li>• Secure method of being able to make payments while travelling overseas.</li> <li>• Access to a card that is widely accepted by merchants both domestically and/or internationally.</li> </ul> <p>However, the Card is <b>not suitable</b> for customers with the following characteristics:</p> <ul style="list-style-type: none"> <li>• Businesses, or individuals who are under the age of 18 or not residents of Australia.</li> <li>• Customers who wish to use the Card for the prohibited transaction types set forth in the Nium Terms and Conditions.</li> <li>• Customers whose activities fall within, or who wish to use the Card for activities that are restricted by Nium's Terms and Conditions or Pelikin's Terms and Conditions, each of which is available at <a href="http://www.pelikin.co">www.pelikin.co</a>.</li> </ul>

## DISTRIBUTION CONDITIONS

Pelikin must only market and promote the product via:

- the Pelikin website;
- advertising as deemed approved by the agreement it has with Nium; and
- any other communication channels approved by Nium.

The product should only be distributed under the following circumstances:

- by Pelikin in the course of providing customers with its consumer travel spending product and are only available to customers who have a registered account with Pelikin and Nium respectively;
- the customer meets Nium's eligibility and approval criteria; and
- in accordance with the Nium Terms and Conditions and the product process requirements agreed between Nium and Pelikin.

There are controls to limit distribution of the products to customers within the target market. This includes that relevant content on the Pelikin website is approved by Nium and includes information designed to inform customers about the products' attributes and key matters relevant to the suitability of the products. In addition, Pelikin and/or Nium perform due diligence and other checks on all customers before they agree to provide the products to them. As part of such checks, Pelikin and/or Nium may ask customers to provide information to verify their identity and eligibility, and may ask third party service providers to verify certain information about the customers.

These conditions make it likely that the products will only be distributed to customers within the target market described in this TMD because:

- Nium has designed the features, terms and conditions of the products for customers within the target market.
- Pelikin understands these features, terms and conditions.
- Nium and Pelikin have implemented processes and controls so that the products are only issued to retail clients if they fall within the target market.

## REVIEW TRIGGERS

Routine reviews of this TMD will be conducted annually.

In the event of the significant or material issues the TMD may no longer be considered appropriate and a review of the TMD will be undertaken by Nium and Pelikin. The review triggers will include but not limited to:

- Material product changes that may cause this TMD to no longer be appropriate for the target market.
- Changes to the distribution model or channels.
- Feedback or notification from ASIC or another interested party (such as AFCA) which suggests the TMD is no longer appropriate.
- High volume or significant material customer complaints relating to the product, its distribution or conduct in providing the product.
- Product cancellation rates for paying customers in a calendar quarter that are materially above the previous calendar quarter.
- A significant dealing that is not consistent with the product's TMD occurs.

Where a review trigger arises, this TMD will be reviewed, and updated where required, within 10 business days.

## REPORTING

The below must be provided by Pelikin to Nium in writing.

<b>Financial product complaints data and cancellation data</b>	Information and data relating to complaints received pertaining to the financial products (including complaints related to distribution or marketing) and product cancellation rates for paying customers. The reports are to be provided on a quarterly basis and no later than 10 business days from the end of the quarter. The reports will include the number and substance of complaints, including relevant details about the complaint, and product cancellation rates for paying customers for each quarter.
<b>Significant dealing outside the target market</b>	<p>Pelikin must report to Nium if it becomes aware of a 'significant dealing' in relation to this TMD within 10 business days. This includes the date or date range of the significant dealing and a description of the significant dealing (e.g., an explanation as to why it is inconsistent with this TMD).</p> <p>Whether or not a dealing is significant is a matter to be determined in the circumstances of each case. Several factors should be considered such as:</p> <ul style="list-style-type: none"> <li>● the proportion of customers who are not in the target market;</li> <li>● the actual or potential harm to customers, including the amount of any financial loss, resulting from customers who are not in the target market acquiring the product;</li> <li>● the nature and extent of the inconsistency of distribution with the TMD;</li> <li>● the proportion of gross income obtained from the product in respect of customers who are not in the target market acquiring the product; and</li> <li>● the time period in which these acquisitions outside the target market occurred.</li> </ul>
<b>Information requested by Nium</b>	Pelikin must provide any other information requested by Nium from time to time as soon as practicable and no later than the date specified by Nium.

## DOCUMENT CONTROL

Version	Date issued	Comments
1.0	13 December 2021	1 <sup>st</sup> TMD issued in line with the Design & Distribution Obligations
2.0	19 June 2024	2 <sup>nd</sup> TMD issued in line with the Design & Distribution Obligations

