

Target Market Determination for Qantas Pay

Issued by EML Payment Solutions Limited (EML)

Category	Description	
Product	Qantas Pay A multi-currency reloadable, prepaid payment facility that is preloaded with funds and used to make purchases and withdraw cash overseas and in Australia where Mastercard is accepted and to earn Qantas Frequent Flyer Points.	
Start Date Date the determination was made	15 April 2025	
Version	3.0	
Review Date	The first review, and each ongoing review, must be completed within each consecutive period from the Start Date.	
Target Market Class of consumers that comprise the target market for the product	Consumer Description This describes consumers in the target market	Objectives and Needs A person who is currently (or intends to become) a Qantas Frequent Flyer member and may be seeking a reloadable prepaid facility to make purchases and withdraw cash overseas and in Australia and that allows the person to earn Frequent Flyer points and who is not seeking a debit facility for use with a deposit product.
		Financial Situation A person who, at the time of application, has access to funds in Australian dollars to preload the facility in one of the 11 currencies available and pay any applicable fees.
	Product Description This describes the product	A multi-currency reloadable, prepaid payment facility with the following key attributes: <ul style="list-style-type: none"> the ability to make purchases and withdraw cash in multiple currencies and, based on loading foreign currency and/or spending, to earn Qantas Frequent Flyer points; the ability to load funds in specified currencies; and a requirement to preload the facility and pay any applicable fees In general, it is only available to consumers that meet standard eligibility criteria.
	Appropriateness Statement This explains why the product is consistent with the likely objectives, financial situation and needs of the target market	The issuer has considered that the product (including its key attributes) is suitable for the target market (including the likely objectives, financial situation and needs of consumers in the target market).
Distribution Conditions The conditions and restrictions on the distribution of the product	Marketing and Promotion This condition applies to marketing and promotional materials that describe the product	Condition 1 A distributor must only market and promote the product through: <ul style="list-style-type: none"> advertising on television, radio, the internet (including social media), billboards and physical banners, brochures and other marketing material available to the general public; and any other issuer approved communication channels (including telephone, email and social media). This condition is appropriate as the target market is wide.
	Retail Product Distribution Conduct (other than Marketing) This condition applies to all conduct (other than marketing) such as issuing, arranging and providing disclosure material	Condition 2 A distributor must only engage in retail product distribution conduct (other than general advice) through: <ul style="list-style-type: none"> through the Qantas Money website and Qantas Pay app; and any other issuer approved communication channels (including in-person, telephone, websites, email and social media). This condition is appropriate as the target market is wide. It is also appropriate as the issuer has distributed this product using these methods, with limited risk to consumers.
Review Triggers The events and circumstances that would reasonably suggest the determination is no longer appropriate	The issuer, and any distributor of this product, must cease retail product distribution conduct in respect of this product when the issuer determines a material event or circumstance has occurred in relation to:	
	Material Complaints	Material complaints (in number or significance) in relation to the terms of this product and / or the distribution conduct.
	Product Performance	Evidence, as determined by the issuer, of the performance of the product, in practice, that may suggest that the product is not appropriate for the target market.
	Distributor Feedback	Reporting from distributors, or consistent feedback from distributors on the target market which suggests that the determination may no longer be appropriate.
	Substantial Product Change	A substantial change to the product that is likely to result in the determination no longer being appropriate for the target market.
	Significant Dealing	A material pattern of dealings in the product or of distributor conduct that is not consistent with the determination.
	Notification from ASIC	A notification from ASIC requiring immediate cessation of product distribution or particular conduct in relation to the product.

Reporting Period	The reporting period for this determination is each consecutive 6 month period from the Start Date.	
Reporting Information The kinds of information needed to identify whether a review trigger has occurred, who must report this information and the reporting period	A distributor that engages in retail product distribution conduct in respect of this product must provide the following information in writing to the issuer within the times specified below:	
	Complaint Information	Information about complaints received in relation to the product during the reporting period, and if complaints were received, a description of the number of complaints and the nature of the complaints received and other complaint information set out in paragraph RG 271.182 of Regulatory Guide 271 Internal dispute resolution. The distributor must provide the information as soon as practicable, or in any event, within 10 business days after the end of each reporting period. Importantly, these commissions (and the other benefits referred to below) are not charged directly to you. Rather they are paid from the product fees applicable to the financial product you acquire.
	Distributor Feedback	Information discovered or held by the distributor that suggests that the determination may no longer be appropriate. The distributor must provide the information as soon as practicable, or in any event, within 10 business days after becoming aware of the significant dealing.
	Significant Dealing	Information about any significant dealing in the product that is not consistent with the target market determination of which the distributor becomes aware. The distributor must provide the information as soon as practicable, or in any event, within 10 business days after becoming aware of the significant dealing.
	Information Requested by Issuer	Information reasonably requested by the issuer. The distributor must provide the information as soon as practicable and no later than the date specified by the issuer.
Notes Other information relevant to the distribution of the product	Nil	

Document Control

Version	Date	Comments
1.0	27 February 2024	New version as a result of a new issuer.
2.0	21 May 2024	Updated version to reflect a new product name.
3.0	15 April 2025	Updated version to reflect a new customer value proposition and new Qantas Pay app.

Note that when printed, this document may have been superseded.

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Effective 15 April 2025.