VanEck®

Target Market Determination

VanEck Bitcoin ETF (ASX code: VBTC)

This Target Market Determination (**TMD**) is required under section 994B of the *Corporations Act 2001* (Cth) (**the Act**). This TMD describes the class of consumers that comprises the target market for the financial product and matters relevant to the product's distribution and review (specifically, distribution conditions, review triggers and periods, and reporting requirements). Distributors must take reasonable steps that will, or are reasonably likely to, result in distribution of the product being consistent with the most recent TMD (unless the distribution is excluded conduct).

This document is not a product disclosure statement (**PDS**) and is not a complete summary of the product features or terms of the product. This document does not take into account any person's individual objectives, financial situation or needs. Persons interested in acquiring this product should carefully read the PDS for the product before making a decision whether to buy this product.

Important terms used in this TMD are defined in the TMD Definitions which supplement this document. Capitalised terms have the meaning given to them in the product's PDS, unless otherwise defined. The PDS can be obtained at www.vaneck.com.au/library/document-listing.

Target Market Summary

This product is likely to be appropriate for a consumer who:

- **is seeking capital growth;**
- **is intending to use the product as a satellite allocation within a portfolio;**
- **has no minimum investment timeframe;**
- **has an Extremely High risk/return profile; and**
- **is seeking withdrawal proceeds to be typically paid within a week of request.**

VBTC is an exchange traded product and is generally only available to consumers through the ASX.

Fund and Issuer Identifiers

Issuer	VanEck Investments Limited	**ISIN Code**	AU0000336950
Issuer ABN	22 146 596 116	**Market Identifier Code**	XASX
Issuer AFSL	416 755	**Product Exchange code**	VBTC
Fund manager	VanEck Investments Limited	**TMD issue date**	29 July 2026
TMD contact details	VanEck Australia – DDO DDO@vaneck.com.au	**TMD Version**	3
Fund name	VanEck Bitcoin ETF	**Distribution status of fund**	Available
ARSN	677 471 444	**TMD end date**	Not applicable.
APIR Code	Not applicable		

Description of Target Market

TMD indicator key

The Consumer Attributes for which the product is likely to be appropriate have been assessed using a red and green rating methodology:

In target market	Not in target market

Instructions

In the tables below, Column 1, Consumer Attributes, indicates a description of the likely objectives, financial situation and needs of the class of consumers that are considering this product. Column 2, TMD indicator, indicates whether a consumer meeting the attribute in column 1 is likely to be in the target market for this product.

Appropriateness

The Issuer has assessed the product and formed the view that the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market, as the features of this product in Column 3 of the table below are likely to be suitable for consumers with the attributes identified with a green TMD Indicator in Column 2.

Investment products and diversification

A consumer (or class of consumer) may intend to hold a product as part of a diversified portfolio (for example, with an intended product use of *minor allocation*). In such circumstances, the product should be assessed against the consumer's attributes for the relevant portion of the portfolio, rather than the consumer's portfolio as a whole. For example, a consumer may seek to construct a balanced or moderate diversified portfolio with a minor allocation to growth assets. In this case, a product with a *High* risk/return profile may be consistent with the consumer's objectives for that *minor allocation* notwithstanding that the risk/return profile of the consumer as a whole is *Medium*. In making this assessment, distributors should consider all features of a product (including its key attributes).



Consumer Attributes *A description of the likely objectives, financial situation and needs of the class of consumers in the target market*	TMD Indicator	Product description including key attributes

Consumer's investment objective

Capital Growth		VBTC's investment objective is to provide investment returns before fees and other costs by tracking the performance of the price of bitcoin. VBTC gives investors exposure to the price of bitcoin by investing in the VanEck Bitcoin ETF, an exchange traded fund that is listed on the Cboe BZX Exchange, Inc in the United States. Bitcoin typically offers higher return potential in the short, medium and long-term and therefore VBTC is likely to be appropriate for consumers who are seeking capital growth but are comfortable with a high level of price volatility and other risks that are associated with an investment in bitcoin.
Capital Preservation		
Income Distribution		

Consumer's intended product use (% of Investable Assets)

Solution/Standalone (up to 100%)		As VBTC gives investors exposure to the price of bitcoin by investing in a single asset, the VanEck Bitcoin ETF (HODL), VBTC has no portfolio diversification. Therefore, VBTC is appropriate as a satellite allocation of a consumer's portfolio (up to 5%) with an objective of capital growth and with an extremely high risk (ability to bear loss) and return profile.
Major allocation (up to 75%)		
Core component (up to 50%)		
Minor allocation (up to 25%)		
Satellite allocation (up to 5%)		

Consumer's investment timeframe

Minimum investment timeframe	No minimum investment timeframe	There is no minimum investment timeframe specific for VBTC. VBTC is suitable for both consumers looking to gain exposure to bitcoin on a short term investment horizon as well as those looking to make a medium to long term strategic allocation to bitcoin as part of a wider diversified portfolio.

Consumer Attributes *A description of the likely objectives, financial situation and needs of the class of consumers in the target market*	TMD Indicator	Product description including key attributes

Consumer's Risk (ability to bear loss) and Return profile

Low	
Medium	
High	
Very high	
Extremely high	

Due to VBTC's exposure to bitcoin, the level of investment risk is considered extremely high. Therefore, consumers in the target market have a risk (ability to bear loss) and return profile of 'Extremely high' and can accept a significant or total loss of their investment.

The product is also suitable for consumers who are comfortable with the specific risks associated with VBTC which are set out in the Product Disclosure Statement.

Consumers should be specifically comfortable with the following risks:

- **Pricing risk:** Bitcoin prices are highly volatile.
- **Concentration risk:** VBTC is invested in a single crypto-asset, bitcoin, so it does not provide investors the diversification benefits that are common in other ETFs. An investment in VBTC will therefore be significantly more volatile than an investment in more diversified funds. VBTC is not intended to provide a complete investment solution and should only form part of a broader diversified investment portfolio.
- **Custody risk:** Ownership of bitcoin exists through the use of numerical codes called 'private keys', which are stored digitally. Loss, theft or damage of the private keys would result in loss of ownership or inaccessibility of the bitcoin and the potential for unknown third parties to access the keys.
- **Cybersecurity risk**: More than other investment assets, bitcoin is subject to risks such as hacking, malware and other malicious attacks and bad actors.
- **Immutability risk:** Incorrect or unauthorised transfers of bitcoin cannot be reversed. Bitcoins that are incorrectly transferred may be irretrievable and will impact the value of VBTC.
- **Environmental risk:** The creation of bitcoin is generally understood to have a high environmental impact. This may trigger increased government regulation and negative market sentiment which may adversely affect the value of bitcoin and VBTC.

Note: This attribute looks at an investor's objectives for the relevant portion of their portfolio only, rather than the investor's portfolio as a whole. An extremely high-risk product may be appropriate for a growth allocation as part of a mixed portfolio, notwithstanding that the risk/return profile of the investor as a whole may be lower.

Consumer Attributes *A description of the likely objectives, financial situation and needs of the class of consumers in the target market*	TMD Indicator	Product description including key attributes
Consumer's need to access capital		
Within one week of request		Under ordinary circumstances consumers can buy and sell units in VBTC on ASX and Cboe Australia on any day that ASX and Cboe Australia are open. A sale of units in VBTC will generally settle two trading days after the date of the sale trade under ordinary circumstances.
Within one month of request		
Within three months of request		
Within one year of request		
Within 5 years of request		
Within 10 years of request		
10 years or more		

Distribution Conditions/Restrictions

Distribution conditions	Distribution condition rationale
Retail clients can only purchase and sell VBTC on ASX and Cboe Australia.	This distribution condition will assist with VBTC being distributed to consumers within the target market, as outlined in this TMD.
VanEck maintains reasonable controls relating to communications regarding VBTC to ensure they align with this TMD.	This distribution condition mitigates the risk of VBTC being distributed to consumers outside the target market, as outlined in this TMD.

Review triggers

Material change to key attributes, fund investment objective and/or fees.
Material deviation from benchmark / objective over sustained period.
Key attributes have not performed as disclosed by a material degree and for a material period.
Determination by the issuer of an ASIC reportable Significant Dealing.
Material or unexpectedly high number of complaints (as defined in section 994A(1) of the Act) about the product or distribution of the product.
The use of Product Intervention Powers, regulator orders or directions that affects the product.

Mandatory TMD review periods

Review period	Maximum period for review
Initial review	1 year (completed)
Subsequent review	2 years

Distributor reporting requirements

Reporting requirement	Reporting period	Which distributors this requirement applies to
Complaints (as defined in section 994A(1) of the Act) relating to the product. The distributor should provide all the content of the complaint, having regard to privacy.	As soon as practicable but no later than 10 business days following end of calendar quarter.	All distributors
Significant dealing outside of target market, under section 994F(6) of the Act. See Definitions for further detail.	As soon as practicable but no later than 10 business days after distributor becomes aware of the significant dealing.	All distributors

Reports are to be emailed to ddo@vaneck.com.au.

Definitions

In some instances, examples have been provided below. These examples are indicative only and not exhaustive.

Term	Definition
Consumer's investment objective	
Capital Growth	The consumer seeks to invest in a product designed or expected to generate capital return over the investment timeframe. The consumer prefers exposure to growth assets (such as shares or property) or otherwise seeks an investment return above the current inflation rate.
Capital Preservation	The consumer seeks to invest in a product designed or expected to have low volatility and minimise capital loss. The consumer prefers exposure to defensive assets that are generally lower in risk and less volatile than growth investments (this may include cash or fixed income securities).
Income Distribution	The consumer seeks to invest in a product designed or expected to distribute regular and/or tax-effective income. The consumer prefers exposure to income-generating assets (this may include high dividend-yielding equities, fixed income securities and money market instruments).
Consumer's intended product use (% of Investable Assets)	
Solution/Standalone (up to 100%)	The consumer may hold the investment as up to 100% of their total *investable assets*. The consumer is likely to seek a product with *very high* portfolio diversification.
Major allocation (up to 75%)	The consumer may hold the investment as up to 75% of their total *investable assets*. The consumer is likely to seek a product with at least *high* portfolio diversification.
Core Component (up to 50%)	The consumer may hold the investment as up to 50% of their total *investable assets*. The consumer is likely to seek a product with at least *medium* portfolio diversification.
Minor allocation (up to 25%)	The consumer may hold the investment as up to 25% of their total *investable assets*. The consumer is likely to seek a product with at least *low* portfolio diversification.
Satellite allocation (up to 5%)	The consumer may hold the investment as up to 5% of the total *investable assets*. The consumer may seek a product with *very low* portfolio diversification. Products classified as *extremely high* risk are likely to meet this category only.
Investable Assets	Those assets that the investor has available for investment, excluding the residential home.
Portfolio diversification (for completing the key product attribute section of consumer's intended product use) ***Note: exposures to cash and cash-like instruments may sit outside the diversification framework below***	
Very low	The product provides exposure to a single asset (for example, a commercial property) or a niche asset class (for example, minor commodities, crypto-assets or collectibles).
Low	The product provides exposure to a small number of holdings (for example, fewer than 25 securities) or a narrow asset class, sector or geographic market (for example, a single major commodity (e.g. gold) or equities from a single emerging market economy).
Medium	The product provides exposure to a moderate number of holdings (for example, up to 50 securities) in at least one broad asset class, sector or geographic market (for example, Australian fixed income securities or global natural resources).
High	The product provides exposure to a large number of holdings (for example, over 50 securities) in multiple broad asset classes, sectors or geographic markets (for example, global equities).
Very high	The product provides exposure to a large number of holdings across a broad range of asset classes, sectors and geographic markets with limited correlation to each other.

Term	Definition
Consumer's intended investment timeframe	
Minimum	The minimum suggested timeframe for holding the product. Typically, this is the rolling period over which the investment objective of the product is likely to be achieved.
Consumer's Risk (ability to bear loss) and Return profile	
This TMD uses the Standard Risk Measure (**SRM**) to estimate the likely number of negative annual returns for this product over a 20 year period, using the guidance and methodology outlined in the ***Standard Risk Measure Guidance Paper For Trustees*** (note the bands in the SRM guidance differ from the bands used in this TMD). However, SRM is not a complete assessment of risk and potential loss. For example, it does not detail important issues such as the potential size of a negative return (including under conditions of market stress) or that a positive return could still be less than a consumer requires to meet their investment objectives/needs. The SRM methodology may be supplemented by other risk factors. For example, some products may use leverage, derivatives or short selling; may have liquidity or withdrawal limitations; may have underlying investments with valuation risks or risks of capital loss; or otherwise may have a complex structure or increased investment risks, which should be documented together with the SRM to substantiate the product risk rating. A consumer's desired product return profile would generally take into account the impact of fees, costs and taxes.	
Low	For the relevant part of the consumer's portfolio, the consumer: • has a conservative or low risk appetite, • seeks to minimise volatility and potential losses (e.g. has the ability to bear up to 1 negative return over a 20 year period (SRM 1 to 2)), and • is comfortable with a low target return profile. The consumer typically prefers stable, defensive assets (such as cash).
Medium	For the relevant part of the consumer's portfolio, the consumer: • has a moderate or medium risk appetite, • seeks low volatility and potential losses (e.g. has the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5)), and • is comfortable with a moderate target return profile. The consumer typically prefers defensive assets (for example, fixed income).
High	For the relevant part of the consumer's portfolio, the consumer: • has a high risk appetite, • can accept high volatility and potential losses (e.g. has the ability to bear up to 6 negative returns over a 20 year period (SRM 5 or 6)), and • seeks high returns (typically over a medium or long timeframe). The consumer typically prefers growth assets (for example, shares and property).
Very high	For the relevant part of the consumer's portfolio, the consumer: • has a very high risk appetite, • can accept very high volatility and potential losses (e.g. has the ability to bear 6 to 7 negative returns over a 20 year period (SRM 6 or 7)), and • seeks to maximise returns (typically over a medium or long timeframe). The consumer typically prefers high growth assets (such as high conviction portfolios, hedge funds, and alternative investments).
Extremely high	For the relevant part of the consumer's portfolio, the consumer: • has an extremely high risk appetite, • can accept significant volatility and losses, and • seeks to obtain accelerated returns (potentially in a short timeframe). The consumer seeks extremely high risk, speculative or complex products which may have features such as significant use of derivatives, leverage or short positions or may be in emerging or niche asset classes (for example, crypto-assets or collectibles).

Term	Definition

Consumer's need to access capital

This consumer attribute addresses the likely period of time between the making of a request for redemption/withdrawal (or access to investment proceeds more generally) and the receipt of proceeds from this request under ordinary circumstances. Issuers should consider both the frequency for accepting the request and the length of time to accept, process and distribute the proceeds of such a request. To the extent that the liquidity of the underlying investments or possible liquidity constraints (e.g. ability to stagger or delay redemptions) could impact this, this is to be taken into consideration in aligning the product to the consumer's need to access capital. Where a product is held on investment platforms, distributors also need to factor in the length of time platforms take to process requests for redemption for underlying investments. Where access to investment proceeds from the product is likely to occur through a secondary market, the liquidity of the market for the product and likely realisable value on market should be considered, including in times of market stress.

Distributor Reporting

Significant dealings	Section 994F(6) of the Act requires distributors to notify the issuer if they become aware of a significant dealing in the product that is not consistent with the TMD. Neither the Act nor ASIC defines when a dealing is 'significant' and distributors have discretion to apply its ordinary meaning. The issuer will rely on notifications of significant dealings to monitor and review the product, this TMD, and its distribution strategy, and to meet its own obligation to report significant dealings to ASIC. Dealings outside this TMD may be significant because: • they represent a material proportion of the overall distribution conduct carried out by the distributor in relation to the product, or • they constitute an individual transaction which has resulted in, or will or is likely to result in, significant detriment to the consumer (or class of consumer). In each case, the distributor should have regard to: • the nature and risk profile of the product (which may be indicated by the product's risk rating or withdrawal timeframes), • the actual or potential harm to a consumer (which may be indicated by the value of the consumer's investment, their intended product use or their ability to bear loss), and • the nature and extent of the inconsistency of distribution with the TMD (which may be indicated by the number of red and/or amber ratings attributed to the consumer). Objectively, a distributor may consider a dealing (or group of dealings) outside the TMD to be significant if: • it constitutes more than half of the distributor's total retail product distribution conduct in relation to the product over the quarter, • the consumer's intended product use is *solution/standalone*, • the consumer's intended product use is *core componen*t or higher and the consumer's risk/return profile is *low*, or • the relevant product has a green rating for consumers seeking *extremely high* risk/return.

Important Information

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