

Supplementary Product Disclosure Statement

Pre-IPO CFDs

Pepperstone Group Limited

ACN: 147 055 703

AFSL: 414530

Original PDS	Product Disclosure Statement
Original PDS date	August 2026
Supplementary PDS date	10 October 2026

Risk Warning: Trading leveraged products like Margin FX and CFDs puts your capital at risk. Pre-IPO CFDs carry additional risks because there is no Underlying Market before the shares list.

1. Important information

- 1.1 This Supplementary Product Disclosure Statement ("**SPDS**") is issued by Pepperstone Group Limited, ACN 147 055 703, AFSL 414530 ("**Pepperstone**", "**we**", "**us**", "**our**"). It supplements, and must be read together with, our Product Disclosure Statement dated August 2026 (the "**PDS**"), and any updated or replacement version of it.
- 1.2 This SPDS contains new and changed information about a new type of CFD that we offer: Pre-IPO CFDs. It is provided to Retail Clients.
- 1.3 Words defined in the PDS have the same meaning in this SPDS, unless we define them in section 9 of this SPDS.
- 1.4 If there is any inconsistency between this SPDS and the PDS in relation to Pre-IPO CFDs, this SPDS applies.
- 1.5 Before you trade a Pre-IPO CFD, it is important that you read this SPDS, the PDS, our Terms and Conditions, our Financial Services Guide and the Contract Details for that Pre-IPO CFD. You should also consider whether you are in our target market by reading our Target Market Determination on our website.
- 1.6 The contents of this SPDS are general information only and do not take into account your personal situation, financial objectives or needs. You might need to seek independent advice before you trade Pre-IPO CFDs.

Key Risks at a Glance

- 1.7 **Pre-IPO CFDs carry all the risks set out in the PDS, plus these additional risks:**
 - (a) **No Underlying Market:** there is no market price for the shares before they list. We set the price, and it is influenced by our clients' trading, including yours;
 - (b) **Price divergence:** our price may differ materially from the offer price and from the price at which the shares trade once they list;
 - (c) **Listing risk:** the listing may be delayed, changed or cancelled. If the shares are not listed by the Final Listing Date, your positions will be voided (see section 5);
 - (d) **Gapping on listing:** the first traded price can differ sharply from our last quoted price, and Stop Loss Orders and Limit

Orders may be filled at a much worse price, or not at all;

- (e) **Wider spreads and restricted trading:** spreads are typically much wider than for share CFDs, and we may limit position sizes, restrict trading to closing positions only, or stop quoting;
- (f) **Higher Margin:** Margin requirements are higher than for other share CFDs and may change at short notice;
- (g) **Continuation on listing:** when the shares list, your position continues as a share CFD and its value then moves with the price on the Underlying Market, which may be very different from our last quoted price. This may result in a large loss, a Margin Call or a Close-Out (see section 5.3); and
- (h) **Limited information:** there may be limited information about the company before it lists, and that information may change. Our prices may react to new information quickly and without notice.

We explain these risks in more detail in section 7 of this SPDS.

2. About Pre-IPO CFDs

What is a Pre-IPO CFD?

- 2.1 A Pre-IPO CFD is a CFD over the shares of a company that has announced its intention to list on a stock exchange, but whose shares have not yet started trading on that exchange.
- 2.2 A Pre-IPO CFD lets you speculate on the price at which you think the company's shares will trade once they list. As with our other CFDs, you do not own the shares or have any rights in them, and trading a Pre-IPO CFD does not give you an allocation of shares in the IPO.
- 2.3 We quote Pre-IPO CFDs as a price per share, in the currency in which the shares are expected to trade on listing.

Contract Details

- 2.4 We publish Contract Details for each Pre-IPO CFD on our website and Platform. They include:
 - (a) the company and the exchange on which its shares are expected to list;
 - (b) the quote currency and contract size;

- (c) the Offer Price, if known;
- (d) the expected Listing Date and the Final Listing Date;
- (e) the Listed Share CFD that the Pre-IPO CFD will continue as on listing;
- (f) the Margin requirement and any position limits; and
- (g) the trading hours.

2.5 We may update the Contract Details if the terms or timetable of the IPO change. It is your responsibility to check the Contract Details before you trade and while you hold a position.

Example: Opening a Pre-IPO CFD and continuing on listing

XYZ Limited has announced an IPO on the ASX at an Offer Price of \$11.00 per share. We quote the XYZ Pre-IPO CFD at 11.50/12.50. You think XYZ shares will trade higher once they list, so you buy 1,000 Contracts at \$12.50, a notional value of \$12,500. With a Margin requirement of 50%, you need \$6,250 in your Account as Initial Margin.

XYZ lists. Your position continues as a long position of 1,000 Contracts in our XYZ share CFD, at your opening price of \$12.50. XYZ shares open on the ASX at \$13.20, so your unrealised profit is $(13.20 - 12.50) \times 1,000 = \700 , less any fees and charges that apply. From then on, your position is treated like any other share CFD, and your profit or loss depends on the XYZ share price until you close it.

If instead XYZ shares opened at \$11.00, your unrealised loss would be $(11.00 - 12.50) \times 1,000 = -\$1,500$. You may need to deposit more Margin, or your position may be Closed-Out.

3. How we price Pre-IPO CFDs

- 3.1 There is no Underlying Market for a Pre-IPO CFD until the company's shares list. We set the bid and offer prices ourselves.
- 3.2 Our prices are based on a range of factors, which may include:
 - (a) the Offer Price and information in the company's prospectus or other offer documents;
 - (b) public information about the IPO, including bookbuild demand, allocations and changes to the offer;

- (c) market news and developments affecting the company or its sector;
- (d) price movements in comparable listed companies and relevant markets;
- (e) net client positioning and directional bias across our client base; and
- (f) our overall exposure and risk limits.

- 3.3 This means your trading, combined with other clients' trading, directly affects our prices. Our prices are not a forecast of the listing price.
- 3.4 Spreads on Pre-IPO CFDs are typically much wider than on share CFDs and may change at any time. The maximum spread between our bid and offer is 25% of our mid price.
- 3.5 Our prices may move, and may gap, without any trade taking place in an Underlying Market.
- 3.6 We only quote Pre-IPO CFDs during the trading hours set out in the Contract Details. Section 11.11 of the PDS (Out of Hours Trading) applies.

4. Trading Pre-IPO CFDs

Margin

- 4.1 Pre-IPO CFDs are treated as "shares or other assets" for the maximum retail leverage set by ASIC (see section 4.5 of the PDS). This means the Margin requirement is at least 20% of the notional value. We set a higher Margin requirement for Pre-IPO CFDs, as set out in the Contract Details.
- 4.2 We may increase the Margin requirement at any time, including at short notice before the Listing Date or if the terms of the IPO change. Where practicable, we'll tell you about the change through the Platform before it takes effect. Sections 4.4 to 4.29 of the PDS apply.
- 4.3 Our Negative Balance Protection applies to Pre-IPO CFDs in the same way as to our other CFDs, including where the price gaps on listing. This means your maximum loss (including costs) is limited to the value of your Account equity. See section 1.10 of the PDS.

Position limits and restrictions

- 4.4 We may set limits on the size of the position you can hold in a Pre-IPO CFD, and on our total exposure across all clients.

- 4.5 To manage our risk, we may at any time and without notice:
- (a) refuse to accept an Order, or accept only part of it;
 - (b) restrict a Pre-IPO CFD to "close-only", which means you can close existing positions but cannot open new ones;
 - (c) restrict a Pre-IPO CFD to "Long Only" or "Short Only", which means you can only open new long positions, or only open new short positions (as applicable), but can still close existing positions;
 - (d) widen our spreads; or
 - (e) stop quoting a Pre-IPO CFD.
- 4.6 If we restrict or stop quoting a Pre-IPO CFD, you may not be able to open or close positions at the time or price you want.

Orders

- 4.7 You can place Stop Loss Orders and Limit Orders on Pre-IPO CFDs, but we cannot guarantee them. Orders may be filled at a much worse price, particularly when the shares list and the first traded price gaps from our last quoted price. See section 4.30 of the PDS.
- 4.8 You can only open and close Pre-IPO CFDs with us. They cannot be transferred to another provider.

5. Listing, continuation and voiding

Changes to the IPO

- 5.1 If the listing is delayed but still expected before the Final Listing Date, your positions stay open. We may change the Margin requirement, spreads and position limits. Where practicable, we'll tell you about any change through the Platform or on our website.
- 5.2 If the terms of the IPO change in a way that affects the value of a Pre-IPO CFD (for example, a share split or consolidation before listing), we may adjust your position fairly to preserve its economic value, consistent with section 8.23 of the PDS (Corporate actions).

Continuation on listing

- 5.3 On the Listing Date, at the open of the first trading session on the Underlying Market, each open Pre-IPO CFD position will automatically continue as a position in our CFD over the listed shares (the "**Listed Share CFD**"). We won't close your position, and its size, direction and opening price stay the same.
- 5.4 From that time, your position is priced from the Underlying Market and the PDS applies to it in the same way as to our other share CFDs, including the Margin requirement, commission, Swap Charges, dividends and corporate actions for the Listed Share CFD. The Margin requirement for the Listed Share CFD may be different from the Margin requirement for the Pre-IPO CFD.
- 5.5 The first price of the Listed Share CFD may be very different from our last quoted price for the Pre-IPO CFD. The difference is reflected in the unrealised profit or loss on your position, and may lead to a Margin Call or Close-Out. Your Stop Loss Orders and Limit Orders will carry over to the Listed Share CFD.
- 5.6 If the shares list on a different exchange, or in a different currency, from what we expected, we will convert your position into the quote currency of the Listed Share CFD at the exchange rate at the time it continues.

Voiding

- 5.7 If the company's shares have not started trading on a stock exchange by the Final Listing Date, or the company announces that the IPO is withdrawn or will not proceed, we will void all open positions in that Pre-IPO CFD and close them at the price at which they were opened. This means you will not make a profit or loss on those positions, and we will refund any Swap Charges and commission you paid on them.
- 5.8 Positions you closed before voiding are not affected, and any profit or loss on them stands.
- 5.9 Once your positions are voided, the Margin held against them is released to your Account.

Example: Voiding

You buy 1,000 XYZ Pre-IPO CFDs at \$12.50. XYZ later announces that its IPO will not proceed. Your position

is closed at \$12.50, the price at which you opened it, so you make no profit or loss on it.

If you had already closed the position at \$12.00 before the announcement, your loss of \$500 would stand.

6. Fees and costs

- 6.1 **Spread:** the main cost of trading a Pre-IPO CFD is the spread between our bid and offer prices. See section 3.4 of this SPDS.
- 6.2 **Commission:** we charge commission on Pre-IPO CFDs, calculated as a percentage of the notional value of your trade, as published on our website and Platform from time to time. Section 8.14 of the PDS applies. After your position continues as a Listed Share CFD, the commission for that share CFD applies.
- 6.3 **Swap Charges:** we apply Swap Charges to Pre-IPO CFDs held through 5pm New York time before the Listing Date. They are calculated on our mid price for the Pre-IPO CFD, at the rate published on our website and Platform from time to time. After your position continues as a Listed Share CFD, the Swap Charges for that share CFD apply (see section 8.7 of the PDS).
- 6.4 **Dividends and corporate actions:** no dividends are payable before the shares list. Before the Listing Date, sections 8.21 to 8.26 of the PDS apply to a Pre-IPO CFD only as described in section 5.2 of this SPDS. After your position continues as a Listed Share CFD, they apply in the usual way.

7. Additional risks of Pre-IPO CFDs

The risks in this section are added to section 6 of the PDS.

No Underlying Market

- 7.1 Before the shares list, there is no exchange price for them. We set the price of a Pre-IPO CFD, and our clients' trading affects it. Our price may not reflect the price at which the shares eventually trade.

Listing risk

- 7.2 An IPO can be delayed, repriced, resized or withdrawn. If this happens, the value of your position may change sharply, or your position may be voided under section 5.7 of this SPDS.

Gap risk

- 7.3 When the shares start trading, your position continues as a Listed Share CFD and its price can move a long way from our last quoted price. Your loss may be much larger than you expected, you may receive a Margin Call or your position may be Closed-Out, and Stop Loss Orders may not protect you.

Liquidity and restriction risk

- 7.4 Because we are the only source of prices, liquidity may be limited. We may restrict trading to close-only, limit position sizes or stop quoting, and you may not be able to trade when you want to.

Margin risk

- 7.5 Margin requirements for Pre-IPO CFDs are higher than for other share CFDs, and we may increase them at short notice, including before the Listing Date or if the terms of the IPO change. When your position continues as a Listed Share CFD, the Margin requirement for that share CFD applies. If you don't have enough money in your Account to meet a higher Margin requirement, your positions may be Closed-Out (see sections 4.27-4.28 of the PDS).

Information risk

- 7.6 Before a prospectus is lodged, information about the company may be limited or come only from media reports, and it may change. Our prices may react to new information quickly and without notice.

Conflict of interest

- 7.7 We are the counterparty to your trades, and we set the price of Pre-IPO CFDs ourselves, taking into account our own exposure. See section 8.4 of this SPDS.

8. Amendments to the PDS

- 8.1 **Section 2.6 (What is a CFD?):** the following is added: "We may also offer Pre-IPO CFDs. These are described in our Supplementary Product Disclosure Statement for Pre-IPO CFDs dated 10 October 2026."
- 8.2 **Section 4.5 (Margin Obligations):** the following is added after paragraph (e): "Pre-

IPO CFDs are treated as shares or other assets. We set a higher Margin requirement for them, as set out in the Contract Details."

- 8.3 **Section 6 (Key risks):** the risks in section 7 of this SPDS are added.
- 8.4 **Section 9 (Conflicts of Interest):** the following is added after section 9.2: "Section 9.2 does not apply to Pre-IPO CFDs before the Listing Date, because there is no independent source of prices for them. We set these prices ourselves, taking into account factors including our clients' net positioning and our own exposure. This gives rise to a conflict of interest, because we're also your counterparty. We have policies and controls over how these prices are set, reviewed and recorded."
- 8.5 **Section 7 (Regulatory benchmark disclosure), Suspended or Halted Underlying Assets:** for Pre-IPO CFDs, the answer to this benchmark is "No", and the following is added: "We don't meet this benchmark for Pre-IPO CFDs before the Listing Date. There's no Underlying Market for a Pre-IPO CFD during this period, and we allow new Pre-IPO CFDs to be opened at prices we set. We may suspend trading in a Pre-IPO CFD at any time, including if material information about the IPO is released or the IPO is delayed or withdrawn. Once the shares list, the practice described above applies."
- 8.6 **Section 12 (Words that we use in this PDS):** the definitions in section 9 of this SPDS are added.
- 8.7 **Section 1.10 (Key Risks at a Glance):** the following is added after paragraph (g): "(h) **Pre-IPO CFDs:** if you trade Pre-IPO CFDs, there's no Underlying Market before the shares list and we set the prices ourselves. Prices can gap sharply when the shares list and your positions continue as share CFDs, spreads are wide, and your positions will be voided if the shares don't list by the Final Listing Date. See our Supplementary Product Disclosure Statement for Pre-IPO CFDs dated 10 October 2026."

website and Platform, as described in section 2.4 of this SPDS.

"IPO" means an initial public offering of shares in a company, leading to their listing on a stock exchange.

"Listed Share CFD" has the meaning given in section 5.3 of this SPDS.

"Listing Date" means the first day on which the company's shares trade on a stock exchange (which is then the Underlying Market).

"Final Listing Date" means the date, set out in the Contract Details, by which the shares must have started trading on a stock exchange (which is then the Underlying Market), failing which positions are voided under section 5.7 of this SPDS.

"Offer Price" means the price at which shares are offered to investors in the IPO.

"Pre-IPO CFD" means a CFD over the shares of a company whose shares have not yet started trading on a stock exchange, as described in this SPDS.

10. Contact us

- 10.1 If you have any questions about this SPDS or Pre-IPO CFDs, please contact us:

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9. Words that we use in this SPDS

"Contract Details" means the specifications for each Pre-IPO CFD published on our