

# **Anjali Capital Markets**

## **SAFEGUARDING OF CLIENTS FUNDS**

<b>CONTENT</b>	<b>Page</b>
1. The Scope .....	3
2. Holding Segregated Accounts .....	3
3. Authorised Signatories .....	4
4. Reconciliation of Clients' Funds Company Objectives .....	4
5. Mitigation .....	4

## **1. The Scope**

- a) This policy of Anjali Capital Markets (hereinafter referred to as “ACM” or “the Company”) details the procedure of the placement of clients’ funds with the credit institution.
- b) For the purposes of safeguarding funds belonging to clients, the company shall comply with the below requirements:
  - 1. The Company shall keep records and accounts, to enable the company at any time and without delay to distinguish assets held for one client from assets held for any other client, and from its own assets.
  - 2. the Company shall maintain its records and accounts in a way that their accuracy will be ensured, and especially their connection to the financial instruments and funds held for clients.
  - 3. the Company shall conduct, on a regular basis, reconciliations between its internal accounts and records and those of any third parties by whom those assets are held.
  - 4. the Company shall take the necessary steps to ensure that client funds deposited, in a central bank, a credit institution or a bank authorized in a third country or a qualifying money market fund are held in an account or accounts identified separately from any accounts used to hold funds belonging to the Company.
  - 5. the Company shall introduce adequate organizational arrangements to minimize the risk of the loss or diminution of client assets, or of rights in connection with those assets, as a result of misuse of the assets, fraud, poor administration, inadequate recordkeeping, or negligence.

## **2. Holding Segregated Accounts**

- a) The Company shall deposit all clients’ funds with segregated account held with reputed financial institutions within Republic of Mauritius or to an equivalent country.
- b) These funds shall be completely segregated from the Company’s own money. This segregation is carried out with the aim to ensure that Client funds are never used by the Company for any purpose, nor can they be used for the clients of the Group the Company belongs to.
- c) The Company may also use multiple institutions to ensure diversification of segregated accounts.

### **3. Authorised Signatories**

- a) The Company shall appoint two persons with combined signatory powers in terms of clients' funds accounts. The signatories for those accounts shall be the 2 Executive Directors (4 eyes).

### **4. Reconciliation of Clients' Funds Company Objectives**

- a) The Company shall regularly conduct reconciliation of clients' funds.
- b) In case of any significant weaknesses detected the accounting team shall take all possible corrective measures.
- c) Reconciliations on regular basis shall be reviewed by the Board of the Company.

### **5. Mitigation**

- a) The measures adopted include the risk identification of possible detrimental reliance on third parties, procedures to minimize such risks and diversify the clients' funds without sacrificing the speed or service quality to clients.
- b) The Company shall implement measures for identification and mitigation of possible exposures connected to Safeguarding of Clients' Funds at all times.
- c) The Board of Directors will take the necessary measures to identify and take corrective actions to minimize the possible exposures connected to safeguarding clients' funds.