

Safety of Funds Policy

SAFEGUARDING OF CLIENTS' FUNDS POLICY

As a regulated Company we are required by the Regulator to open a Segregated account to ensure that the clients' funds are safe.

Segregated account is a bank account or securities account in which a customer's funds are held separate from the funds of a brokerage firm. The law requires that a broker must hold separately, in separate accounts on the broker's books, securities it holds for its customers from securities of the broker itself. This is done to create a clear separation between the two groups of money so client funds are not used for the wrong purpose. A central reason for the rule is that it also helps ensure that the money or securities can be easily identified as belonging to customers in case a firm becomes bankrupt.

Funds transferred from an individual client to Red Pine Capital (PTY) LTD will usually be received directly into a segregated client bank account and the company cannot use such funds and as per the General code of conduct for authorised Financial Services Providers under the FAIS Act, all clients' funds are separated from those funds belonging to Red Pine Capital (PTY) LTD.

When you open an account with us we will hold your money on a segregated basis. This means that we pay each client's money – including deposits and net unrealised profits – into a segregated client bank account (i.e. an account which is separate from our own).

As a Regulated company we are required to:

- keep accurate records and accounts – so that at any time and without delay – distinguish assets held for one client from assets held for any other client, and company own assets;
- maintain accurate records and accounts. Such accounts to be updated monthly as per the general code of conduct;
- conduct reconciliations between internal accounts and records, and with those of third parties;
- take necessary steps to ensure that client funds which are deposited are held in an account or accounts identified separately from any accounts used by the Company.

The company is to appoint external auditors who will audit the accounts to make sure that the transactions are properly recorded and that there is a clear segregation between the accounts that holds clients' funds and the account that the company uses for the daily running of the business.

The auditors report directly with their findings to the Financial Sector Conduct Authority (FSCA).