OFFICIAL PUBLIC POLICY

Client Funds and Custody Disclosure

Document information	Details
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Registration and licence	Company No. HV00726497 | Mwali Licence No. BFX2026056

This document is issued by Ergenso Ltd and applies from the effective date above. Where it refers to the Client Portal, a Current Schedule or a product-specific disclosure, the version provided for the relevant account, product and jurisdiction applies.

> **No assumption of protection:** Do not assume that money sent to Ergenso is held in a statutory trust, segregated client account, insured bank deposit or investor compensation scheme unless your onboarding disclosure expressly confirms the arrangement and legal basis.

K.1 Operational disclosure

Before funding, the Client Portal or country schedule must describe how money is received, the name or type of payment provider, whether funds may be pooled, whether Ergenso or a third party holds them, the treatment of margin and trading obligations, and any applicable insolvency or compensation risk.

K.2 Third parties and omnibus accounts

Funds may pass through banks, payment service providers, liquidity providers, clearing counterparties or omnibus accounts where permitted. This can create operational, legal, reconciliation and insolvency risk. Ergenso remains responsible for selecting and monitoring providers to the extent required by contract and law, but cannot promise that every third party will remain solvent or available.

K.3 Reconciliation and access control

Internally, client-ledger balances, provider balances, pending deposits, pending withdrawals, chargebacks and trading obligations should be reconciled on a documented frequency, with breaks escalated. Payment approval, ledger adjustment and complaint review should be segregated by access rights where practicable.