



Safeguarding Policy

Last Updated: March 2025

1. Introduction:

YWO (CM) Ltd (hereinafter referred to as the “**Company**”) is a company registered in Fomboni, Island of Moheli, Union of Comoros, with registration number HT00225012. The Company holds and operates an International Brokerage and Clearing House License with license number BFX2025026, and operates under the brand name “YWO”.

1.1. Purpose

This policy establishes the framework for safeguarding client assets under the management of the Company. It aligns with our International Brokerage and Clearing House License issued by the MWALI International Services Authority, reinforcing our commitment to regulatory compliance, integrity, and financial security.

1.2. Scope:

This policy applies to all aspects of the Company’s operations related to the handling, management, and protection of client assets. It is binding on all employees, subsidiaries, and affiliates involved in asset management.

2. Regulatory Compliance

2.1. Regulatory Framework:

The Company strictly adheres to the regulations and guidelines set forth by the MWALI International Services Authority, in addition to complying with international financial laws, best practices, and industry standards.

2.2. Licensing and Legal Compliance:

Our operations are fully authorized under the International Brokerage and Clearing House License, ensuring that all transactions, asset handling, and safeguarding practices are conducted within legal and regulatory boundaries.

3. Client Asset Protection

3.1. Segregation of Client Assets:

Your assets are maintained in separate accounts, completely distinct from the Company’s operational funds. This ensures that your assets are not used for covering operational expenses, liabilities, or other corporate financial activities, providing full security and peace of mind.

3.2. Custodial Arrangements:

To ensure maximum protection, all client funds and assets are deposited in well-established, reputable financial institutions that comply with strict regulatory

standards and best practices. These institutions are regularly assessed to confirm their reliability and adherence to industry safeguards.

3.3. Reconciliation and Audit Procedures:

We perform systematic reconciliations of all client accounts to maintain accuracy, transparency, and security. Additionally, independent external audits are conducted periodically to verify compliance with financial safeguarding measures, ensuring that your assets are protected at all times.

4. Risk Management

4.1. Risk Identification and Assessment:

Our robust risk management framework is designed to identify, evaluate, and document any potential threats to client assets. We continually monitor for emerging risks to adapt our strategies accordingly and provide maximum security.

4.2. Mitigation and Control Measures:

To minimize potential risks, we implement stringent internal controls, including:

- Segregation of duties to prevent unauthorized handling of assets
- Restricted access to sensitive client data and funds
- Multi-level authorization processes to ensure secure transactions
- Regular internal assessments to detect vulnerabilities before they become risks

4.3. Continuous Monitoring and Review:

Risk management is not a static process. We continuously refine and enhance our security protocols to stay ahead of evolving threats. Regular assessments ensure our mitigation strategies remain effective, and any new risks are promptly addressed through updated policies and additional safeguards.

5. Reporting and Transparency

5.1. Client Communication:

We believe in complete transparency regarding your assets. Clients receive regular, detailed reports outlining the security, status, and movements of their funds. Our dedicated support team is also available to address any inquiries or provide further clarification regarding asset protection measures.

5.2. Regulatory Reporting:

We strictly adhere to all legal and regulatory reporting requirements set by the MWALI International Services Authority and other relevant governing bodies.

Compliance with these regulations ensures that our asset protection practices meet the highest industry standards, safeguarding your interests at all times.

6. Ethics and Conduct

6.1. Code of Ethics:

We are committed to upholding the highest ethical standards in asset protection. All employees and stakeholders are required to adhere to strict principles of honesty, integrity, and accountability in every aspect of financial management.

6.2. Conflict of Interest Management:

We proactively identify and address potential conflicts of interest that could impact client asset protection. Our strict conflict-of-interest policy ensures that all decisions are made transparently and in the best interest of our clients.

7. Training and Awareness

7.1. Employee Training Programs:

All employees undergo extensive training on best practices for safeguarding client assets, risk mitigation, and compliance with regulatory standards. This ensures that our team is always equipped to uphold the highest level of asset protection.

7.2. Ongoing Awareness Initiatives:

The financial landscape is constantly evolving, and so is our knowledge. We conduct regular workshops, refresher courses, and knowledge-sharing sessions to ensure our employees remain up-to-date on emerging regulations and industry-leading asset protection techniques.

8. Policy Review and Updates

8.1. Regular Review Schedule:

Our asset protection policy is reviewed at least annually or more frequently in response to regulatory updates, operational changes, or emerging threats. This ensures our policies remain relevant and effective in safeguarding client assets.

8.2. Amendment Process:

Any amendments to this policy go through a structured review process, which includes input from key stakeholders, compliance officers, and legal advisors. This ensures that any changes align with the latest regulatory requirements and industry best practices before implementation.

9. Conclusion:

Protecting your assets is our top priority. Through strict compliance, ethical business practices, proactive risk management, and transparent communication, we ensure that your funds and investments remain secure. If you have any questions or require further information, please do not hesitate to contact our support team.