

INVESTOR PROTECTION POLICY

Giraffe Markets

1. Objective

The objective of this Investor Protection Policy (“Policy”) is to establish a structured framework to protect client interests, ensure the safeguarding of client funds, maintain transparency, and mitigate financial, operational, and compliance risks associated with investment and trading activities conducted through Giraffe Markets.

This Policy is designed to meet the expectations of:

- Banking institutions
- Regulators
- Auditors and compliance reviewers
- Other financial counterparties

2. Applicability

This Policy applies to:

- All clients (retail, professional, and institutional, where applicable)
- Directors, senior management, employees, agents, and representatives
- All activities related to client onboarding, fund handling, trading, and withdrawals

3. Regulatory and Governance Framework

Giraffe Markets operates under a governance structure that ensures:

- Compliance with applicable financial services regulations
- Adherence to internal risk management, AML/CFT, and compliance policies
- Oversight by senior management and the Board of Directors

Investor protection is treated as a core governance responsibility.

4. Segregation and Safeguarding of Client Funds

4.1 Segregation of Funds

- Client funds are held in segregated client accounts maintained separately from the company's operational and proprietary accounts.
- Client funds are not used for:
 - Company expenses
 - Hedging company positions
 - Any purpose other than executing client instructions or processing withdrawals

4.2 Banking Arrangements

- Client funds are accepted and held only through regulated banking institutions or licensed payment service providers.
- Deposits and withdrawals are permitted only from accounts held in the client's own name, subject to AML and KYC requirements.

4.3 Insolvency Protection

- In the event of insolvency or financial distress, segregated client funds remain ring-fenced and are not subject to claims by company creditors.

5. Transparency and Disclosure

- Clients are provided with clear and accurate information regarding:
 - Trading conditions
 - Fees, commissions, spreads, and charges
 - Margin requirements and leverage
 - All material terms and conditions are disclosed prior to account activation.
 - No misleading, deceptive, or exaggerated representations are permitted.

6. Risk Disclosure and Client Awareness

6.1 Risk Disclosure

- Clients must acknowledge a Risk Disclosure Statement prior to trading.

- Clients are informed that trading in leveraged products involves a high degree of risk and may result in losses exceeding initial deposits.

6.2 No Assurance of Returns

- Giraffe Markets does not offer, promote, or imply guaranteed profits, fixed returns, or risk-free trading.

7. Suitability and Client Onboarding Controls

- Client onboarding includes:
- KYC and AML verification
- Assessment of trading experience and knowledge
- Products and services are offered in accordance with client profile and regulatory suitability standards.

8. Fair Dealing and Conflict Management

- Giraffe Markets maintains a Conflicts of Interest Policy to identify, prevent, and manage potential conflicts.
- Trading practices are conducted on a fair and transparent basis.
- Any material conflict is disclosed where required.

9. Operational Controls and Business Continuity

- Robust internal controls are implemented to prevent operational failures.
- A Business Continuity and Disaster Recovery Plan (BCP/DR) is maintained to ensure:
- Continuity of trading systems
- Protection of client data
- Timely restoration of services during disruptions

10. Data Protection and Confidentiality

Client data is protected through:

- Restricted access controls
- Secure IT systems
- Cybersecurity safeguards

- Client information is disclosed to third parties only:
- With client consent, or
- Where legally or regulatorily required

11. Monitoring, Fraud Prevention, and Market Abuse

- Continuous monitoring is conducted to identify:
- Fraudulent activity
- Market abuse
- Irregular or suspicious transactions
- Any suspicious activity is escalated and reported in accordance with AML/CFT obligations.

12. Complaints Handling and Dispute Resolution

12.1 Complaints Management

- Clients may submit complaints through official communication channels.
- Complaints are acknowledged, investigated, and resolved in a fair and timely manner.

12.2 Escalation

- Where a complaint cannot be resolved internally, clients may escalate the matter to the relevant regulatory authority.

13. Internal Oversight and Review

- Compliance with this Policy is subject to:
- Ongoing management oversight
- Periodic internal audits
- Regulatory review, where applicable

Any breach of this Policy is addressed promptly with corrective measures.

14. Policy Review

- This Policy is reviewed at least annually, or sooner if required due to:
- Regulatory changes
- Banking or compliance requirements
- Updates require approval from senior management or the Board.

15. Declaration

- Giraffe Markets confirms that this Investor Protection Policy reflects its commitment to safeguarding client interests, maintaining financial integrity, and complying with banking and regulatory standards.

Approved By:
Board of Directors
Giraffe Markets
Effective Date: [●]