PRIME DESK

MULTI-ASSET INSTITUTIONAL-GRADE BROKERAGE

Client Money Policy

How Prime Desk Ltd. Holds, Segregates
and Protects Client Funds

Company Registration Number 2026-00429
Saint Lucia International Business Company
Version 1.0 · Reference PD·LEG·10

FORMS PART OF THE CLIENT AGREEMENT

WWW.PRIME-DESK.COM

1 — The Commitment

Client money is held separately from the Company's own money, is used only for the client's own account, and is never applied to the Company's business.

> **WHAT THIS IS, AND WHAT IT IS NOT**
>
> Segregation is a **contractual and operational** commitment made by Prime Desk Ltd. The Company is incorporated in Saint Lucia and is not authorised by a Tier-1 financial regulator. There is therefore **no statutory client money regime, no trust imposed by regulation, and no investor compensation scheme** standing behind your funds.
>
> What exists is this Policy, the segregated account structure it describes, the reconciliation discipline at Section 4, and your rights under the Client Agreement. You should weigh that before depositing.

2 — Segregation

Separate accounts	Client funds are held in bank and payment accounts opened in the Company's name but designated as client accounts, and kept apart from the accounts through which the Company meets its own expenses.
Designation	Each such account is designated so that it is identifiable as holding client money and not the Company's own.
No commingling	Company funds are not held in client accounts, except where a small buffer is maintained to prevent an account falling short, which is disclosed in the reconciliation.
Individual records	Each client's entitlement is recorded individually in the Company's books, whether or not client funds are held in a pooled account.
Selection of institutions	Banks and payment institutions are selected on financial standing, regulatory status, jurisdiction, and operational reliability, and are reviewed at least annually.

3 — Permitted and Prohibited Use

3.1 What Client Money May Be Used For

a) Meeting margin obligations arising from that client's own positions.

b) Settling that client's realised losses, commissions, swap, and other charges properly due under the Client Agreement.

c) Paying that client's withdrawals.

3.2 What It May Never Be Used For

a) Financing the Company's operations, salaries, marketing, partner commissions, or any other expense.

b) Meeting the margin or losses of any other client.

c) Lending, investment, or pledging as security for any obligation of the Company.

d) Providing collateral to a liquidity provider in respect of the Company's own exposure, otherwise than as margin properly attributable to client positions.

The Company does not pay interest on client money, and any interest earned on a client account is applied to the cost of maintaining that account.

4 — Reconciliation

Daily	Internal reconciliation of aggregate client entitlement against the balances recorded in the Company's books.
Monthly	External reconciliation of the Company's records against statements from every bank and payment institution holding client money.
Shortfall	Any shortfall identified is made good from the Company's own funds on the same business day it is identified, and the cause is investigated.
Excess	Company money found in a client account is withdrawn promptly once identified, other than the buffer at Section 2.
Escalation	Unresolved differences are escalated to the Chief Compliance Officer and reported to the Board.

5 — Your Balance

Your balance is the amount recorded on your trading account, being your deposits, adjusted for realised profit and loss, charges properly applied, and withdrawals. Margin committed to open positions remains your money but is not available for withdrawal while those positions are open. Unrealised profit on an open position is not client money until the position is closed.

6 — Risks to Client Money

Segregation protects against one risk. It does not protect against all of them.

RISK	POSITION
Failure of a bank	Client money is held with third-party institutions. If one fails, the client money held there is at risk. The Company is not liable for the failure of a properly selected institution, and any resulting shortfall may be borne rateably by clients.
Failure of a payment provider	Funds in transit to or from a payment provider are exposed to that provider until received.
Pooling	Where client money is pooled, you do not have a claim against a specific sum but against the pool, and a shortfall in the pool may be shared rateably.
Jurisdiction	Accounts may be held in jurisdictions whose insolvency and creditor rules differ from those where you live and may be less favourable.
Failure of the Company	See Section 7.

7 — If the Company Were to Fail

READ THIS BEFORE DEPOSITING

If Prime Desk Ltd. became insolvent, the segregated structure described here is intended to allow client money to be identified and distributed to clients rather than to the Company's general creditors. Whether that outcome is achieved depends on the insolvency law applied, the adequacy of the records at that moment, and the conduct of the insolvency process.

There is no compensation scheme. No government or industry body will make up a shortfall. You would rank as a claimant in respect of amounts owed to you, and you may recover less than your full balance, or nothing.

8 — Governance and Enquiries

This Policy is owned by the Chief Compliance Officer, reviewed at least annually, and reported on to the Board quarterly together with reconciliation results. The current version is published at www.prime-desk.com. Enquiries about your balance should be sent to **support@prime-desk.com**; enquiries about this Policy to **compliance@prime-desk.com**.

Trading forex and CFDs is highly speculative and is not suitable for all investors. You may lose some or all of your capital. · Prime Desk Ltd., Top Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia LC01 401 · Client Money Policy v1.0 · PD·LEG·10