

Client Money Handling Policy

Company Name : Doo Financial Australia Limited

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ABN Number : 50 100 139 820

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1. Purpose

This policy details how Doo Financial Australia Limited ("DFAL" or "the Firm") will treat client money and its reconciliation obligations in accordance with ASIC Client Money Reporting Rules 2017.

The purpose of the rules set forth herein is to keep client money safe in the event of a firm failing and exiting the market.

It is the Firm's policy to arrange adequate protection of client money where it receives or holds money on behalf of its clients. Moreover, when structuring business, the Firm will always act honestly, fairly and professionally in accordance with the best interests of clients.

2. Review of Policy

This policy will be reviewed regularly, at least once a year, and amended as considered necessary by the Firm's Board and Senior Management.

3. Client Money Requirements

The Firm receives or holds money for or on behalf of its clients in connection with its business and as such this money is held under the requirements of this chapter.

3.1. Segregation of client money

The Firm will segregate client money from its own money in order to safeguard the client money.

3.1.1. Depositing Client Money

When the Firm receives client money it will promptly place it into a segregated account held at a regulated credit institution.

3.1.2. Approach to segregation of client money

The Firm adopts the normal approach to segregation of client money.

Under the Firm's normal approach, the Firm ensures that client money is paid directly into a client bank account at one of the permitted institutions within one business day of receipt and that any transfers or payments of client money will be paid directly into the Firm's client bank accounts.

3.1.3. Selection, appointment and review of third parties

The Firm will exercise due skill, care and diligence in the selection, appointment and periodic review of the institution where client money is deposited and the arrangements for the holding of this money. To do this the Firm will take into account the expertise and market reputation of the third party and any legal requirements or market practices related to the holding of client money that could negatively affect clients' rights. The Firm will consider the need for diversification as part of this process.

The Firm will keep a written record of the grounds with which it concludes that the selection and appointment of a bank or money market fund is appropriate and periodic reviews of the selections. These records will be retained for 7 years after the Firm has ceased to use the entity for depositing client money.

3.1.4. Segregation in different currency

The Firm may segregate client money in a different currency from that in which it was received or in which it is liable to the relevant client. Where it does so, it will ensure that the amount held is adjusted each day to an amount at least equal to the original currency or that which it is liable to the client, as at the previous day's closing spot exchange rate.

3.1.5. Mixed Remittance

Where the Firm receives a mixed remittance it will ensure that it is paid directly into a client bank account and that it will pay the money that is not client money out of the bank account no later than one business day after the funds have cleared.

3.2. Records, Accounts and Reconciliations

3.2.1. Records and Accounts

The Firm will ensure that it retains appropriate internal records and accounts in relation to client money. These will be in addition to, and separate from, any records maintained by third parties.

The Firm must keep accurate records as it will enable the Firm to distinguish each client's money from other clients' money and from its own money at any time.

The records should include the following information:

- (a) the balance of reportable client money owed to each of the clients;
- (b) records of transactions that affect the balance of reportable client money held by the Firm, including:
 - (i) withdrawals and deposits relating to the purchase and sale of derivatives for, on behalf of, or for the benefit of the client;
 - (ii) withdrawals of client funds in connection with margining, guaranteeing, securing, transferring, adjusting or settling dealings in derivatives by the Firm (including dealings on behalf of people other than the client); and/or
 - (iii) investment of client funds in which payments may be made out of an account (including the circumstances in which money may be withdrawn and invested, and the kinds of investment that may be made).

These records will be retained for a period of 7 years from the last date of modification.

3.2.2. Reconciliations

The Firm will conduct the following documented and dated checks:

- Internal client money reconciliations
- External client money reconciliations

The Firm's record of a reconciliation should set out the following:

- (a) the total balance of reportable client money owed to the clients;
- (b) the total amount of reportable client money that is being held, or has otherwise been permissibly withdrawn or invested, by the Firm;
- (c) an explanation of any difference between the amount of reportable client money owed to the clients and the amount being held, or otherwise permissibly withdrawn or invested, by the Firm;
- (d) the total balance of the client money account(s) in which it holds reportable client money and the total amount of money other than reportable client money (i.e. non-client money) the Firm holds in the account(s);
- (e) the time and date to which the reconciliation relates;
- (f) the time and date on which the reconciliation was performed;
- (g) for monthly reconciliations, a signed director's declaration stating the director believes, and has no reason not to believe, that the reconciliation is accurate in all respects.

(i) Internal client money reconciliations

The Firm will carry out internal client money reconciliations each business day using the records as at close of business the previous day.

Internal reconciliations will reconcile the Firm's internal records and accounts of the amount of client money that the Firm holds for each client with its internal records and accounts of the client money that the Firm should hold in the client bank account or client transaction account for each client, without referral to those external accounts.

The internal reconciliation will:

- Ensure the accuracy of the Firm's records
- Check whether its client money resource, as at the close of business on the previous business day, was equal to its client money requirement at the close of business on that previous day.

(ii) External client money reconciliations

The Firm will conduct external reconciliations between its internal records and those of third parties who hold client money. External client reconciliations are designed to ensure the accuracy of the Firm's internal records against those of third parties with whom client money is held.

External client money reconciliations will be undertaken daily. In determining the frequency of this reconciliation, the Firm has taken into account the number, frequency and value of the transactions and the risk to which the client money is exposed.

Records of the rationale for the frequency of this reconciliation will be retained indefinitely. In cases where the original record is superseded by a subsequent decision, the original record need only be retained for a further 7 years from the date of the subsequent decision.

When carrying out an external reconciliation the Firm will ensure that for each client bank or transaction account it compares the balance, currency by currency recorded by it with the most recent statement issued by the bank or counterparty with which those accounts are held. It will then promptly identify and resolve any identified discrepancies between balances.

Where there is a discrepancy in the reconciliation and records show there is a need for a greater amount of client money to be held, the Firm will always pay its own money into the relevant account to cover the shortfall and will leave it there until the discrepancy is resolved.

4. Collateral

When the Firm uses a right to use or title transfer arrangement with clients, and the Firm exercises its right to treat the assets as its own, it will ensure that it maintains adequate records to enable it to meet any future obligations, including the return of equivalent assets to the client. If the Firm has not yet exercised its right to treat these assets as its own, then the client money or custody rules will apply.

The Firm will continue to act honestly, fairly and professionally, in accordance with the best interests of the clients, when entering into or exercising its rights and fulfilling its obligations under such an arrangement.

5. Audit

The Firm will ensure that an annual audit is carried out by an external auditor to ensure that it complies with the requirements of Australian Transaction Reports and Analysis Centre and/or Australian Securities & Investments Commission thereon and the audit report will be submitted to the relevant authorities accordingly.

The Firm will use the audit report to evaluate the effectiveness of its systems and controls relating to this policy and will implement any necessary changes to ensure compliance with the relevant rules and regulations.

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