

## **Client Money Policy**

TD 365 has produced this policy document to state how they handle client money. The purpose of the document is to provide clients with an insight to how client money is reconciled and segregated so that they are better informed to assess the safety of their funds in relation to other CFD providers.

All client money is held at Westpac Bank, an Australian authorised deposit-taking institution.

All client money is segregated from any accounts used to hold TD 365's money but is co-mingled with other clients' money as permissible by the Corporations Act.

Client money is required to meet margin requirements but margins are not transferred out of the segregated bank account to fund open positions. This security measure is beyond what is required under the Corporations Act.

Client money is not used to meet any of TD 365's margin requirements. This important security measure is beyond what is required under the Corporations Act.

Each business day net client profits (realised or unrealised) on trades of the previous business day are transferred into the segregated client accounts and net client losses (realised or unrealised) of the previous business day are transferred out of the segregated client accounts. Therefore funds held in segregated client accounts represent the total amount due and payable to all clients as at the previous business day. Payments are only ever made out of the client money accounts to meet withdrawal requests and to pay any net client losses of the previous business day.

In the event of there being a loss on a client's position which exceeds the relevant client's cash deposit, the loss will be treated as a client debt and will be pursued by TD 365 for recovery. Client debts are excluded from the calculation of net amounts owed to clients and as such do not affect the aggregate client segregated funds held within the client accounts.