NOVA SPIRE
CAPITAL

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Client Money Policy

Our approach to the segregation, holding and reconciliation of client funds in line with the requirements of the Financial Sector Conduct Authority (FSCA).

Issuer	Nova Spire Capital (Pty) Ltd J/R of BOF Asset Management (Pty) Ltd
Regulator	Financial Sector Conduct Authority (FSCA) — FSP 53819
Registered Office	1002 Clifton ave, Lyttelton Manor Ex 3, Centurion, Gauteng, 0157, South Africa
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1. Introduction

Nova Spire Capital ("the Company", "we", "our" or "us") is a trading name of Nova Spire Capital (Pty) Ltd J/R of BOF Asset Management (Pty) Ltd, a financial services company registered in South Africa under number [2026/097975/07], authorised and regulated by the Financial Sector Conduct Authority (FSCA), licence number 53819. Our registered office is 1002 Clifton ave, Lyttelton Manor Ex 3, Centurion, Gauteng, South Africa, 0157

We provide online Over-the-Counter (OTC) products including Spread Trades, Contracts for Difference (CFDs) and Margin FX (collectively, "OTC products") to both retail and professional clients.

This Client Money Policy outlines our approach to handling client money. Its purpose is to give clients a clear understanding of how we segregate and reconcile client money so that they can make informed evaluations regarding the security of their funds and meaningful comparisons with other OTC providers.

2. Client Money and Regulations

If your account is held with Nova Spire Capital (Pty) Ltd, the following regulatory protections apply to you.

Key highlights

- Your funds are securely held in segregated client bank accounts at top-tier South African banks.
- Nova Spire Capital is a Juristic Representitive BOF Asset Management who is authorised and regulated by the FSCA in South Africa.

- We do not utilise your funds for any business activities, including hedging trades with other counter parties or as margin for our own hedging trades.
- Your funds are ring-fenced from creditors, providing added protection in the unlikely event of our liquidation.

3. How We Handle the Funds You Deposit

Your money is held in segregated bank accounts under trustee arrangements. This means the funds belong to you, not to Nova Spire Capital, and are clearly identified as client money. As a result, neither Nova Spire Capital nor its creditors have any claim, lien, right of set-off or right of retention over your funds.
We maintain multiple segregated bank accounts with reputable South African banks to ensure diversification and compliance with regulatory requirements. This practice prevents us from holding all client funds in a single location.

> **Reconciliation:** Client money balances are reconciled in accordance with FSCA requirements. Any shortfalls identified are remedied promptly from the Company's own resources.

4. What Happens If Nova Spire Capital or BOF Asset Management Goes Into Liquidation

In the unlikely event of the Company's liquidation, referred to as primary pooling, clients will have their share of segregated funds returned to them. This will be after deduction of the administrator's reasonable costs associated with handling and distributing those funds.

5. Interest, Charges and Currency

Unless otherwise agreed in writing, interest accrued on funds held in our segregated client money accounts is retained by the Company to defray the costs of operating those accounts. Client money may be held in multiple currencies corresponding to your trading activity.

6. Policy Review

This policy was last revised on 17 June 2026 and is reviewed at least annually, or sooner where required by regulatory change or operational events.