

**Gravitas Finance LLC (Gravitas) operates an International Investment Platform with two distinctive offerings namely a VIP Account and an IIP Account offering. Gravitas Finance LLC (Gravitas) is a duly Mauritian company incorporated on November 20th, 2014, regulated and licensed by the Mauritius Financial Services Commission under its Global Business Category 1 licence, Investment Adviser (unrestricted) No C114013418.**

#### **Investor Account Protection**

Protection of investor assets is an integral part of the service offered by the Gravitas International Investment platform ('the Gravitas Platform'). The Gravitas platform observes rigid adherence to industry regulations, follows strict risk and information management procedures coupled with insurance policies and business continuity provisions which ensures the protection of investor assets.

#### **Client Asset Regulation**

Gravitas Finance LLC ('Gravitas') is regulated by the Mauritius Financial Services Commission ('the Mauritius FSC') and as such is required to comply with the rules and regulations issued by the Mauritius FSC relating to client asset protection. In addition to these standards and due to the global nature of its business, Gravitas also applies internationally recognised industry guidelines to safeguard client assets. These include the following:

- **Asset Segregation**

In compliance with applicable regulations and industry norms, investors' assets under our client agreement are kept in separate client designated accounts at our securities and cash custodians segregated from Gravitas' own assets.

Thus in the unlikely event of default by Gravitas, investors' assets are fully protected and are not considered to belong to Gravitas but to investors. Therefore investors' assets cannot at any time be used to repay Gravitas' creditors in the event of any liquidation.

- **Verification of Assets Records and Instructions**

Gravitas uses experienced professionals and service providers to ensure that investor assets held on the Gravitas platform are accurately recorded. Reconciliations are done on a daily basis with investors being granted 24hr online access to their investor accounts.

Gravitas ensures that, at all times, there are client specific agreement in place as to who can issue and receive instructions on investor assets and the extent of their authority.

- **Custodians, Clearing Agents and Brokers.**

Gravitas uses regulated custodians, clearing agents and brokers to handle investor assets held on its platform. Gravitas is under the obligation to only deal with custodians and other service providers which extend as a minimum the same level of client asset protection imposed to it by its regulator.

- **Financial regulations and requirements**

Gravitas is obligated to meet a number of global regulatory requirements in the areas of risk management, capital adequacy, and financial reporting. Statutory Capital Requirements ensures that the Gravitas is adequately capitalised and operates within a best-practice framework.

Yearly audit undertaken by independent, external auditors provides additional, impartial oversight of Gravitas's controls and tests of operating effectiveness. A specific part of the audit focuses on the controls that Gravitas has in place to ensure client asset protection.



- **Additional insurance**

In addition to risk capital and the asset protection offered by compliance with statutory Client Asset Rules, Gravitas has additional insurance policies in force to protect against financial losses caused directly by events such as:

- forgery and fraudulent alteration
- computer crime and computer viruses
- extortion
- physical loss of or damage to the property
- public and product liability
- employer's liability
- professional liability (errors and omissions)
- directors' and officers' liability

- **Business continuity and disaster recovery**

Business continuity is a vital part of any business and ensuring the continuation of critical business processes helps to safeguard investor information and assets in the event of an incident. In recognition of this, Gravitas has tested business continuity plans in place to manage the risk and reduce the impact of a serious incident.