



## Luminaris Securities & Capital Ltd

### Client Disclosure Document

New York • Johannesburg

#### 1. Company Information & Regulatory Background

Luminaris Securities & Capital Ltd ("Luminaris") is a New York-registered financial and capital markets institution.

The company operates under U.S. regulatory expectations based on the Bank Secrecy Act and FinCEN AML/KYC standards.

Luminaris is currently progressing through the MSB (Money Services Business) regulatory registration framework.

In South Africa, Luminaris conducts client-facing operations in partnership with the licensed financial services provider

1Invest Fund Managers (Pty) Ltd (FSCA FSP 49955). All client accounts, custody, settlement and execution activities fall under

FSCA oversight and local regulatory requirements.

#### 2. Segregation of Client Funds

Client funds are strictly segregated from company operational accounts.

All client assets are held and administered through regulated South African financial institutions.

Luminaris does not, under any circumstances, commingle or utilise client assets for corporate purposes.

#### 3. Risk Disclosure

All financial instruments carry inherent investment risks, including market volatility, pricing fluctuations,

liquidity changes, policy impacts, and currency exposure.

Clients should acknowledge:

- Past performance does not guarantee future results
- All investment activity may result in financial loss
- Off-market ETF link channels and market-maker stock programmes may differ from standard exchange trading

#### 4. Product-Specific Disclosure

##### (1) Off-Market ETF Link Channel

This mechanism settles based on net asset value (NAV) and is not affected by minute-to-minute market fluctuations.

Access is dependent on institutional quota availability.

##### (2) Market Maker Stock Allocations

These may involve institutional pricing advantages, wholesale liquidity and specialist underwriting channels.

Luminaris does not guarantee any fixed returns or performance outcomes.

#### 5. Fees & Charges

All fees—including management, execution, custody or processing fees—are fully disclosed to clients prior to any transaction.

A comprehensive fee schedule is available upon request.

#### 6. AML/KYC & Compliance Requirements

All clients must complete FICA/KYC procedures including identity verification, proof of residence,

and source-of-funds checks. Luminaris adheres to global AML/CFT frameworks with sanction list screening

including OFAC and global risk-database monitoring.

#### 7. Data Protection & Privacy

Client data is encrypted and protected in accordance with GDPR, POPIA and U.S. data security standards.

Luminaris will not release client information to external parties unless legally compelled by regulatory authorities.

#### 8. Client Responsibilities

Clients must ensure that all documentation provided is accurate and updated.

Clients must assess their personal risk capacity and make independent investment decisions.

#### 9. Audit & Compliance Oversight

Luminaris maintains an internal compliance structure supported by periodic audits from independent

third party auditors to ensure regulatory integrity in both the U.S. and South African operational frameworks.

#### 10. Complaints & Dispute Resolution

Clients may submit complaints or service concerns through email, customer support channels,

or via the licensed South African partner institution. Luminaris will respond within a reasonable timeframe.

#### 11. Important Notice

Luminaris does not offer guaranteed returns, capital protection or any form of financial promise.

All investment actions are taken voluntarily by the client, who bears the associated risks.