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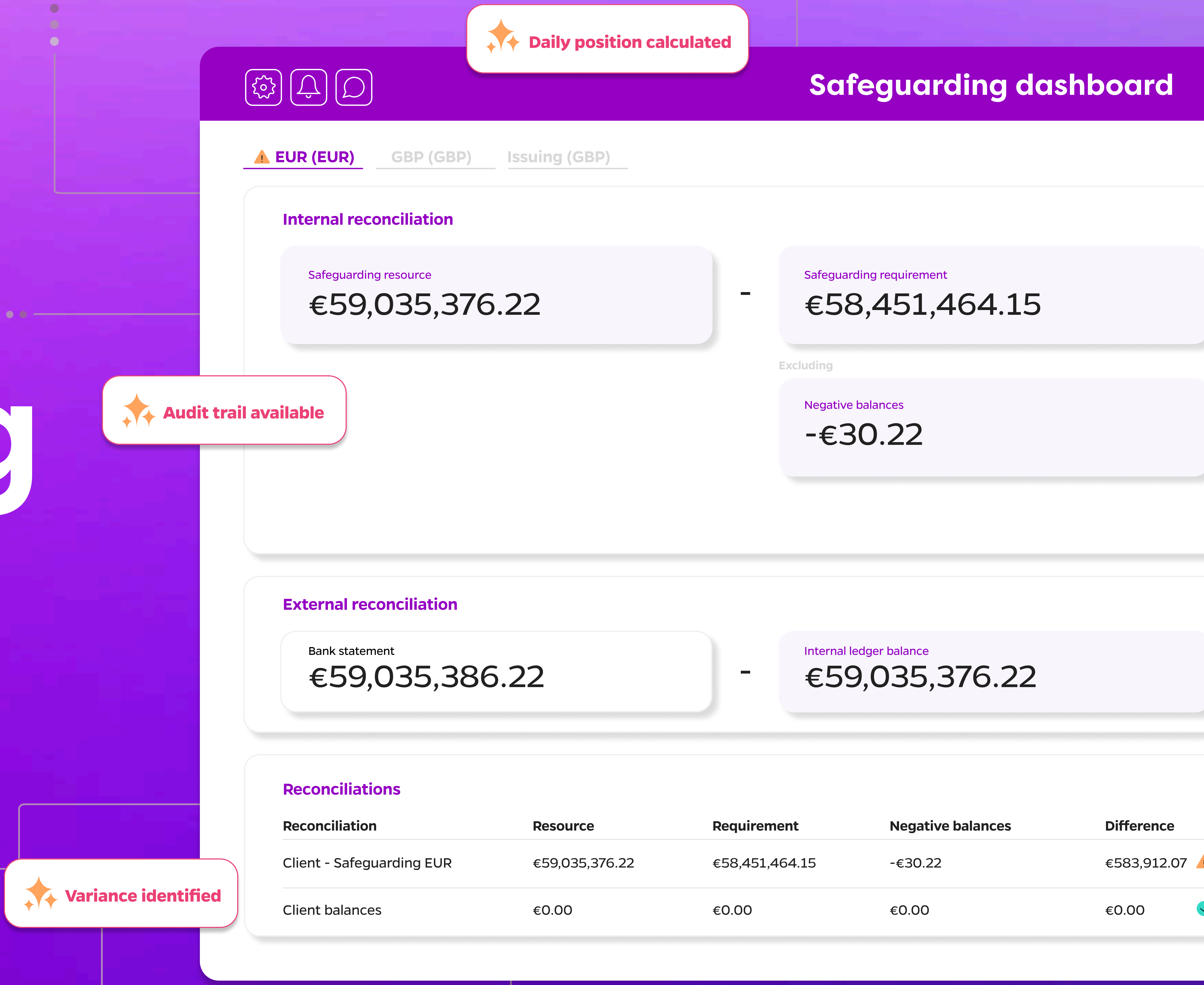
Safeguarding

Built for control.
Designed for scrutiny.
Ready for CASS 15.

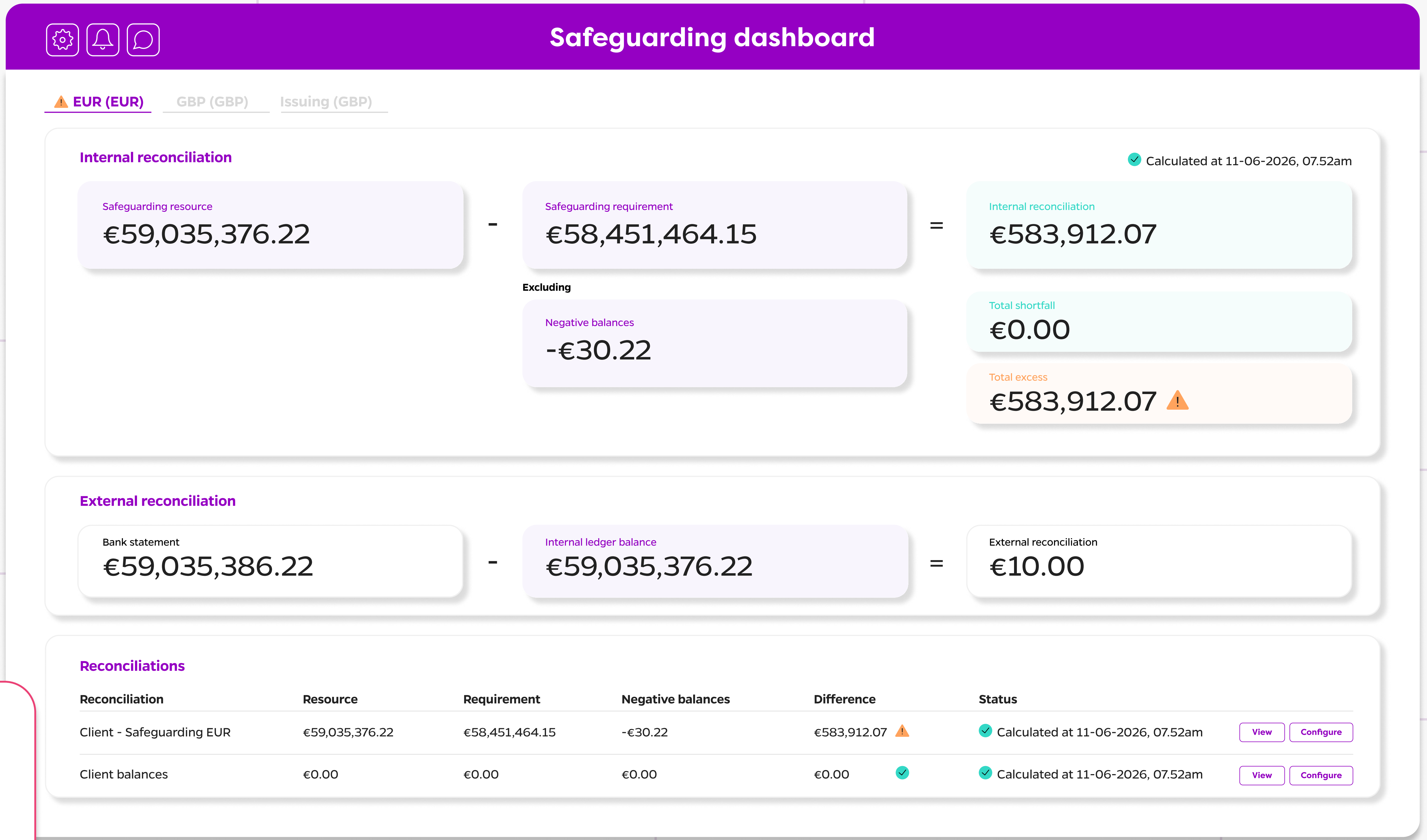


One control centre. Every safeguarding need

Kani gives payment and e-money firms a structured way to calculate, review, evidence and sign off their safeguarding positions every working day.

Built for the FCA's CASS 15 regime, the platform brings fragmented payments data, controls, reconciliations and evidence into daily safeguarding workflows. Configurable around each firm's operating model, Kani supports as many dashboards, currencies, reconciliations and sign-off processes as needed to meet its safeguarding obligations.

Kani Safeguarding



The result

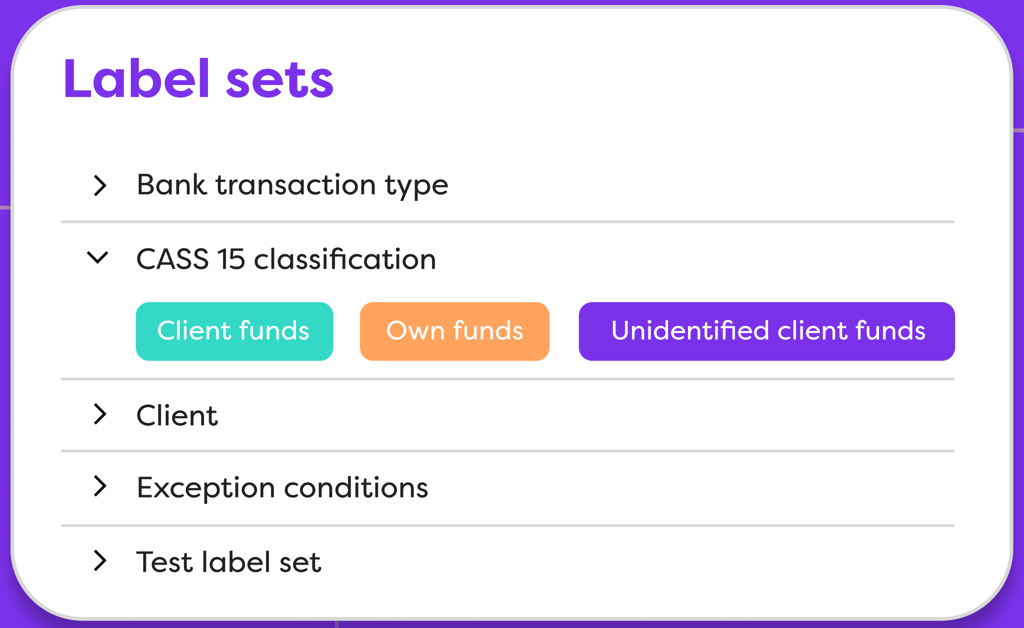
A safeguarding process that is easier to operate, evidence and scale

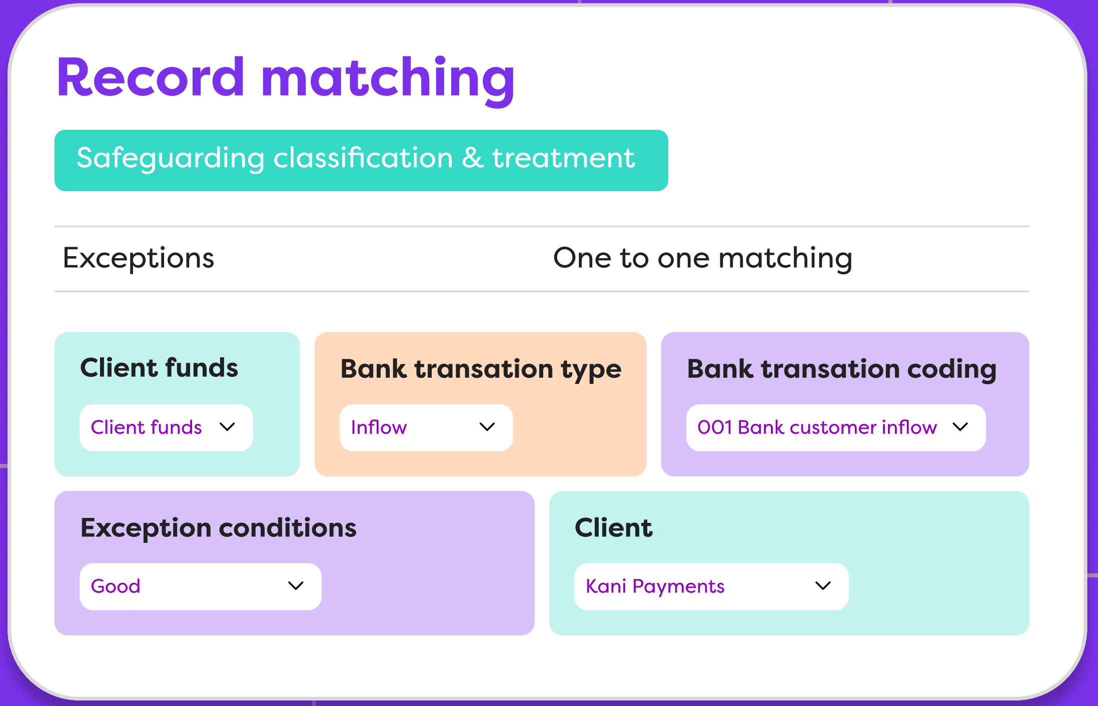
Kani Safeguarding gives firms the control needed to:

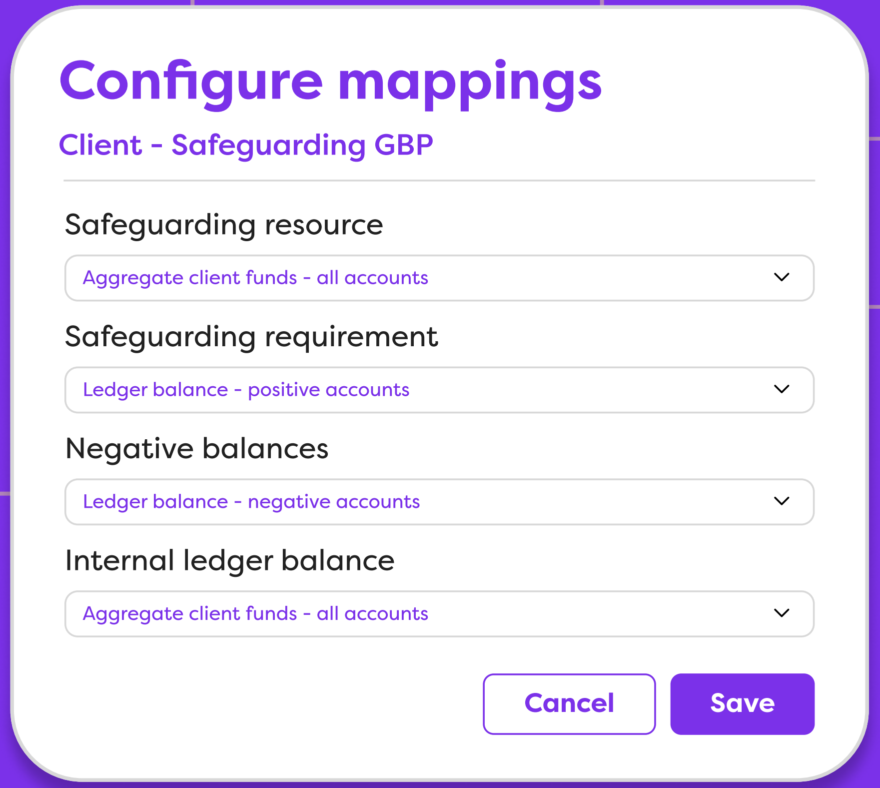
- Bring bank, processor, scheme, ledger and custom file data into one trusted view
- Apply consistent treatment across accounts, transactions and fund flows
- Build internal and external safeguarding reconciliations by client, account, currency or product
- Calculate safeguarding resource versus requirement clearly by currency, dashboard or required safeguarding view
- Detect shortfalls, excesses, negative balances, missing files and reconciliation discrepancies early
- Review, remediate and sign off the daily position with a locked audit record

Eight control layers behind every safeguarding calculation

Kani Safeguarding is built on eight core control layers that work together to support daily CASS 15 operations.







1 Bank data pipelines

Daily ingestion of bank, processor, scheme, ledger and custom file data, with pipelines configured by source and format.

2 Bank data model

A single view of accounts, balances and transactions, regardless of source, format or provider.

3 Account classification

Designation of accounts as Client Funds, Own Funds or Other, with client association and multi-tenanted account handling where required.

4 Rules-based transaction treatment

Classification by fund type, flow type, operational code and CASS 15 treatment, using configurable label sets.

5 Tabular reconciliation

Configurable internal per-client and external per-account reconciliations. They underpin every safeguarding position.

6 Flexible record matching

One-to-one, one-to-many, many-to-one and many-to-many matching, with exceptions surfaced for review.

7 Daily safeguarding dashboard

D+1 calculation of resource versus requirement by currency or configured safeguarding view, with warnings, validations and drill-down detail.

8 Compliance, sign-off & evidence

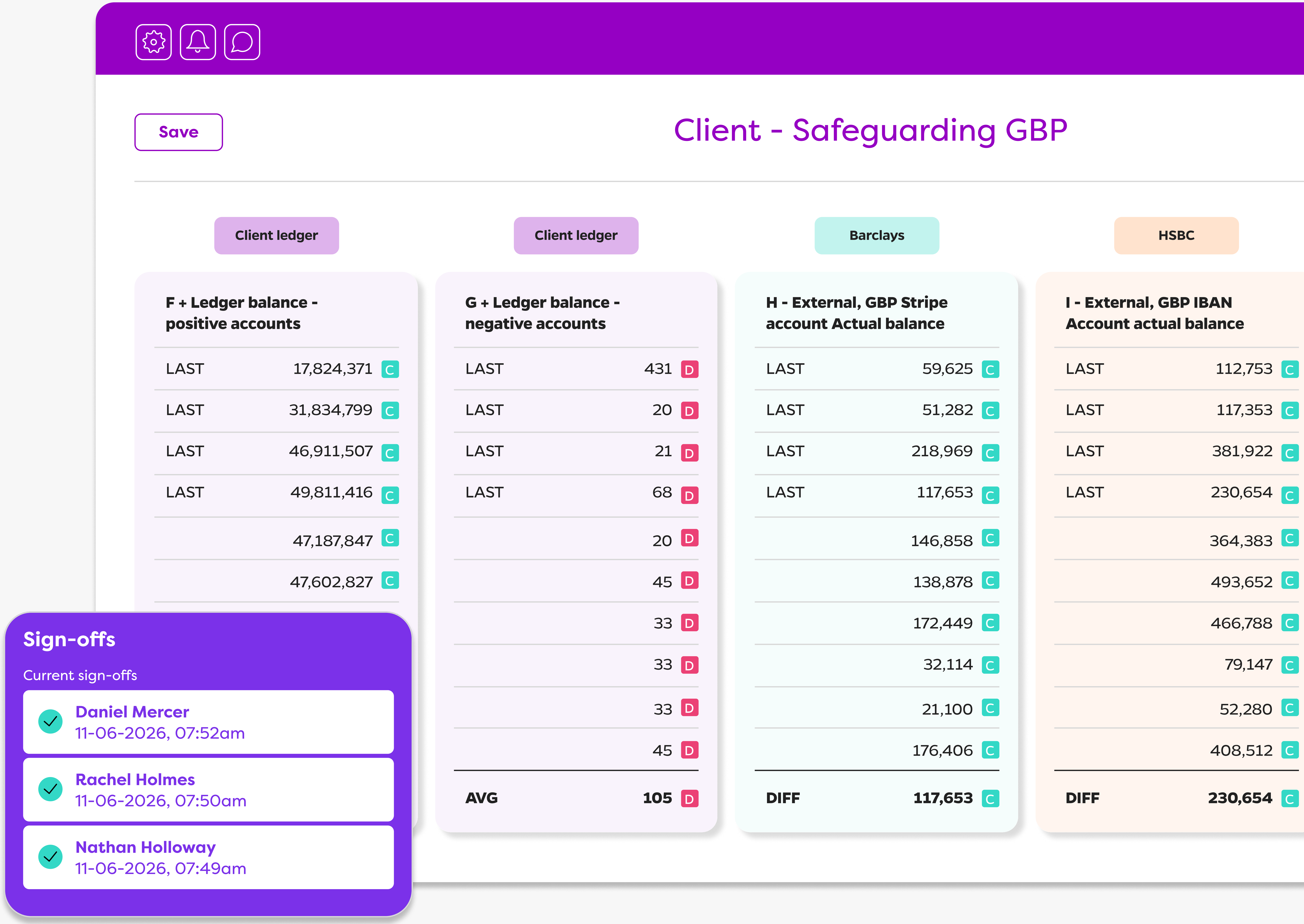
The monthly FCA safeguarding return (REP027), plus remedial action capture, irreversible sign-off, audit trail and breach records.

How the controls work day to day

Everything starts with the tabular reconciliations. Kani will work with you to configure these to fit your business, setting out resource, requirement and balances by account, currency and provider. The tabular reconciliation logic feeds every position on the dashboard.

Teams can calculate the D+1 position by currency, review internal and external reconciliations, investigate alerts, record remedial actions and sign off the final position through one dashboard.

With the position calculated and reviewed, teams can sign off a CASS 15-aligned dashboard in as little as two minutes, with the signed-off position locked as the audit-grade record for that date and currency.



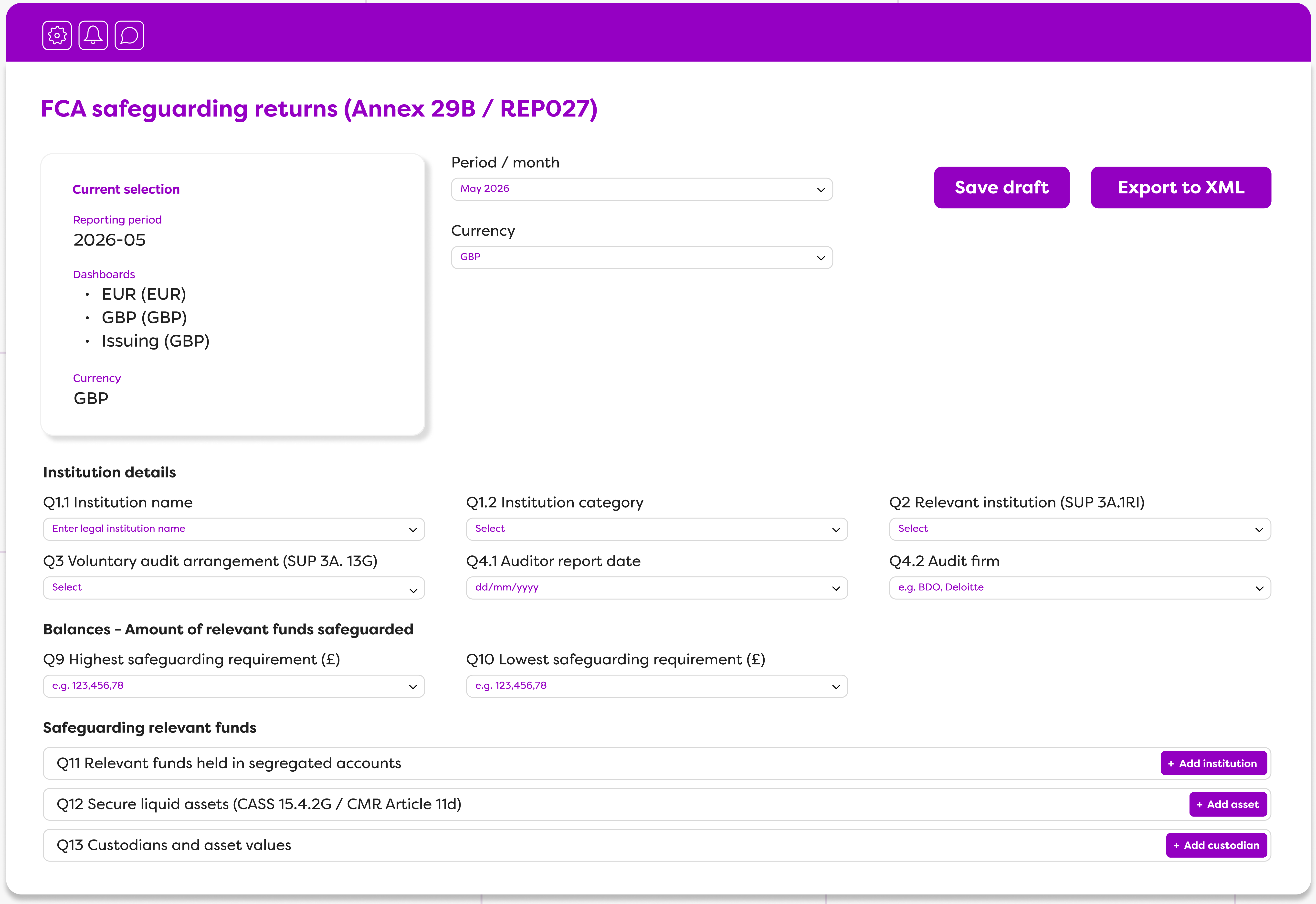
Your monthly return, built from data you can trust

Every month, the safeguarding return has to be produced, evidenced and filed.

Kani builds your REP027 (Annex 29B) safeguarding return from the positions you've already calculated and signed off. The figures Kani can prove are calculated for you, aggregated across your selected dashboards, converted to GBP and totalled day by day. Everything else is yours to complete, and your answers can carry forward to next month where appropriate.

Kani only populates what it can stand behind. You stay the accountable party, with a full view of how every figure was reached and a final check before anything is filed.

When the return's complete, you can export it as an XML in the FCA's own format, then save it and upload it to the FCA portal yourself. Kani builds and formats the return; it never submits on your behalf.



Strengthen daily operations, governance and compliance

Operations

One daily safeguarding position by currency, with client-level breakdowns

Less reliance on spreadsheets, manual checks and fragmented files

Earlier detection of shortfalls, excesses, missing data and reconciliation issues

Governance

Controlled configuration of safeguarding-critical logic

Daily review, remediation and sign-off in one governed workflow

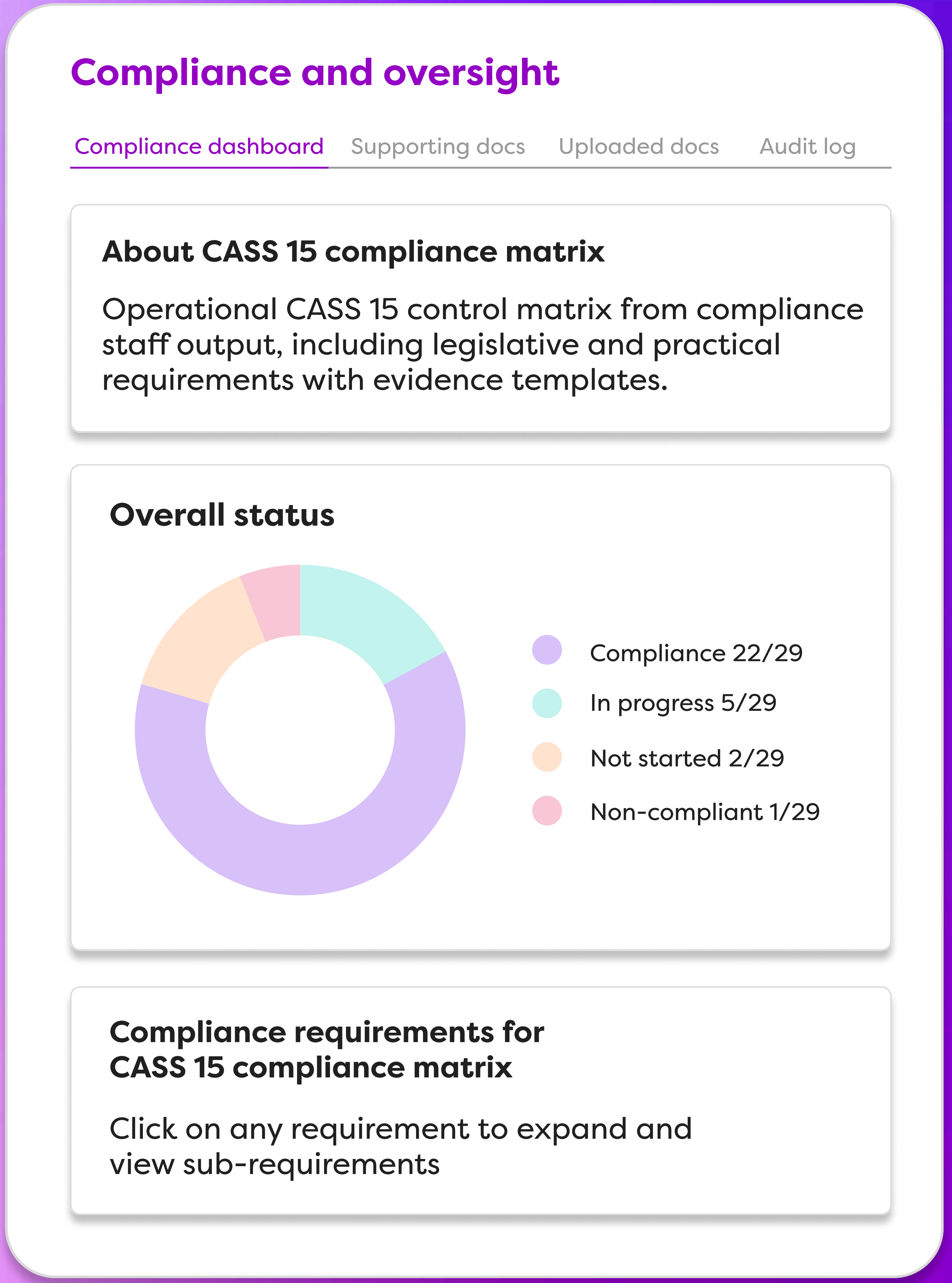
Locked evidence for each signed-off date and currency

Compliance

Internal and external reconciliations aligned to CASS 15

Faster responses to auditors, supervisors and internal stakeholders

Clear evidence of calculations, exceptions, actions and approvals



CASS 15 control mapping: How Kani supports the safeguarding regime

Compliance principle	How Kani supports it
Segregate and protect relevant funds: Maintain arrangements that protect client rights and prevent use of relevant funds for the firm's own purposes.	**Bank account management and account classification** designate each account as **Client Funds / Own Funds; Compliance and Oversight Tool** evidences end-to-end compliance arrangements.
Identify relevant funds end-to-end, including "in transit" funds that are segregated but not yet placed in a relevant funds bank account, and keep account naming clear, including "safeguarding" where possible.	**Account and transaction classification** captures segregated relevant funds including those in transit, ensuring they are included in the safeguarding resource calculation.
Governance and oversight framework: Appoint a single accountable senior manager; maintain documented safeguarding policies and procedures, including reconciliation methodology, frequency and discrepancy handling; clearly identify multi-regime funds and mixed remittances; and establish, document and periodically review third-party arrangements.	**Compliance and Oversight Tool** records the named senior manager and periodic attestations; stores safeguarding policies and reconciliation methodology; captures multi-regime and mixed remittance policy documentation; maintains third-party due diligence records and acknowledgement letters; and supports periodic governance review tracking.
Allocate receipts promptly and control unallocated funds: Allocate relevant funds receipts to an individual client promptly, before the end of the next business day; record as "unallocated relevant funds" until allocated; handle cases requiring immediate allocation.	**Record Matching** matches transactions to the correct client record and flags allocations not completed by the end of the next business day; **Organisation Management** supports the underlying client record structure.

CASS 15 control mapping: How Kani supports the safeguarding regime

Compliance principle	How Kani supports it
Correct safeguarding maths, requirement and resource: Calculate safeguarding resource and requirement correctly; include unallocated receipts; ignore negative balances; support per-client / multi-balance approaches and the treatment of payments, redemptions, fees and timing.	**Tabular Reconciliation** calculates safeguarding resource and requirement, including negative balance identification and unallocated amounts, and supports configurable methodology; **Safeguarding Dashboard** aggregates and displays the position.
Daily reconciliation, discrepancy resolution and evidence: Run internal safeguarding reconciliation and keep an evidential record of what was run, when, by whom, outcomes, discrepancies and actions; compare requirement vs resource and, where applicable, D+1 segregation requirement vs D+1 segregation resource; resolve discrepancies promptly.	**Tabular Reconciliation** compares safeguarding resource and requirement across internal per-client reconciliations and external per-account reconciliations, surfacing shortfalls, excesses, negative balances and discrepancies. **Safeguarding Dashboard** gives teams a single D+1 position by currency, while **Dashboard Auditing** records runs, remedial actions and sign-off evidence. **Scheduling** supports daily automation.
Reporting, audit and breach readiness: Produce the monthly safeguarding return; support the annual safeguarding audit; identify and log notifiable issues and support FCA notification "without delay" where required.	**Compliance & Oversight Tool** generate the monthly return and provide a structured audit / evidence record; **Proactive Alerts** and **Safeguarding Dashboard** identify and record potentially notifiable events; **Compliance and Oversight Tool** maintains breach entries for notification and audit schedules.
Distinguishability and safeguarding asset identification: Easily distinguish relevant vs other funds "at any time and without delay", ensuring safeguarding assets are clearly identifiable within safeguarding records.	**Account Classification** labels accounts by fund type; **Data Explorer** supports transaction-level annotation; **Compliance and Oversight Tool** evidences record and account structures; **Tabular Reconciliation** supports configurable reconciliation structures, for example by currency, client population or product, to determine safeguarding resource and requirement.

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