

Client Assurances and Security of Client Funds



(Payment services only)

Client assurances

Corpay understands that the security of our customers' funds is a vital component of our relationship with every customer, as well as our regulators.

At Corpay we always ensure we meet the applicable regulatory standards in protecting client money. Firms such as us which are authorised and regulated in their respective countries must ensure compliance with all applicable legislation, codes, guidelines and obligations on an ongoing basis.

We have prepared this document for our clients to review and consider before placing any money in the form of client funds with us in order to:

- Explain certain key features of the relevant Regulations;
- Provide you with information on our arrangements for safeguarding your client funds; and
- Set out key risks relating to your client funds.

United States	Applicable government authorities in the US stipulate that licensed Money Service Businesses (MSBs) must have appropriate and well-managed safeguarding arrangements to ensure an MSB's customer funds as defined in the relevant regulation, are not subject to any undue claim and that in the event of insolvency, are returned to the customers, and in a timely and orderly way. Cambridge Mercantile Corp. (U.S.A.) dba Corpay operates in the USA as a licensed MSB registered with FinCEN as a dealer in foreign exchange and a money transmitter.
UK and EMEA	The European Union Payment Services Regulations 2018 (the PSR) and the Electronic Money Regulations 2011 (the EMR) stipulate that Payment Institutions (PIs) and Electronic Money Institutions (EMIs) must have appropriate and well-managed safeguarding arrangements to ensure customer funds are not subject to any undue claim and that in the event of insolvency, are returned to the customer in full, and in a timely and orderly way. In regulatory terms, the PI/EMI is a Payment Services Provider (PSP) and the underlying client is the Payment Services User (PSU). Cambridge Mercantile Corp. (UK) Limited is authorised by the Financial Conduct Authority (FCA) in the United Kingdom as an Electronic Money Institution; that Cambridge entity's safeguarding arrangements are designed to comply with current FCA safeguarding requirements, including applicable rules and guidance as updated from time to time. Associated Foreign Exchange Ireland Limited is authorised by the Central Bank of Ireland as a Payments Institution.
Canada	Cambridge Mercantile Corp., of Ontario, a Canadian MSB (money service business) trading as Corpay, understands that the responsible handling of client funds is a vital component of our relationship with our clients and an important element of our regulatory obligations in Canada. As a Canadian entity providing foreign exchange and payment services, we operate in accordance with applicable Canadian laws and regulatory expectations, including those under Canada's Retail Payment Activities Act ("RPA") and related guidance issued by the Bank of Canada. We maintain internal policies, procedures, and oversight designed to support the prudent handling of client funds in the ordinary course of our business.
Singapore	At Corpay we always ensure we meet the applicable regulatory standards in protecting any money you have entrusted us with. Firms which are authorized and regulated in their respective countries must ensure compliance with all applicable legislation, codes, guidelines, and obligations on an ongoing basis. Applicable government authorities in Singapore stipulate that Payment Licensees must have appropriate and well-managed safeguarding arrangements to ensure an Payment Licensee's customer funds, as defined in the relevant regulation are not subject to any undue claim and that in the event of insolvency, are returned to the customer, and in a timely and orderly way. Associated Foreign Exchange (Singapore) Pte. Ltd. dba Corpay operates in Singapore as a Payment Licensee registered with Monetary Authority of Singapore (MAS).
New Zealand	Applicable government authorities in New Zealand stipulate that licensed Financial Service Providers (FSPs) must have appropriate and well-managed safeguarding arrangements to ensure an FSP's customer funds are not subject to any undue claim and that in the event of insolvency, are returned to the customer in full, and in a timely and orderly way. Corpay (NZ) Limited operates in New Zealand.

Australia	Applicable government authorities in Australia stipulate that Australian Financial Services Licensees (AFSLs) like Corpay must have appropriate and well-managed safeguarding arrangements to ensure an AFSL's customer funds are not subject to any undue claim and that in the event of insolvency, are returned to the customer in full, and in a timely and orderly way. Cambridge Mercantile (Australia) Pty. Ltd. dba Corpay operates in Australia as an AFSL, licensed (among other things) as a dealer in foreign exchange and a money transmitter.
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Purpose and methodology of client money protection

United States	Corpay uses surety bonds and funds held in US domiciled banks to cover our outstanding client obligations. Corpay uses the standard calculations of Average Daily Transmission Liability ("ADTL") applicable to US-based MSBs.
UK and EMEA	There are two methods by which Corpay safeguards client money. — Insurance method; and — Segregation of funds. Under the Insurance Method, client funds are covered by an insurance policy or a comparable guarantee by an 'authorised insurer'. The proceeds of the insurance/guarantee must be payable upon insolvency of the Payment Service Provider and into a safeguarding account. The insurance/guarantee will either cover all relevant funds or part of it with the remaining funds safeguarded under the segregation method. Both Cambridge Mercantile Corp. (UK) Limited and Associated Foreign Exchange Ireland Limited have safeguarding insurance policies in place. Alternatively, in the segregation method Corpay is obliged to put in place certain safeguards to help ensure that clients' funds are protected. Such safeguards including but limited to: — Hold client funds separate to our own which we do through depositing client funds in client safeguarding accounts with a credit institution which have been appropriately segregated in accordance with the relevant Regulations; — Obtain acknowledgement from the credit institution, in line with FCA requirements for safeguarding account acknowledgements, that the client funds are held in client safeguarding accounts; — Maintain accurate records of each client's entitlement to client funds and conduct daily reconciliations of our internal records against those of the credit institution; — Ensure what we are safeguarding is the correct level of client funds on a daily basis; — Have and apply appropriate risk management processes and systems, including documented policies and procedures to ensure that we are effectively safeguarding your funds; and — Carry out counterparty due diligence.
Canada	Corpay maintains operational, financial, and funds-handling practices intended to support the orderly execution of payment services for Canadian clients. There are two means by which Corpay safeguards client money. — Insurance, and — Trust Account. Under the Insurance method, client funds are covered by an insurance policy or a comparable guarantee by an insurance provider. The proceeds of the insurance/guarantee must be payable upon insolvency of the payment service provider will not form part of the payment service provider's estate and is for the benefit of end users. The insurance/guarantee will either cover all relevant funds or part of it with the remaining funds safeguarded in a Trust Account. These practices are proportionate to the nature, scale, and complexity of our activities. Where client funds constitute end-user funds under the RPAA, our approach incorporates safeguarding practices required under RPAA supervisory expectations for payment service providers.
Singapore	Corpay protects funds using the segregation method, funds are held designated client accounts and are held separately from the firm's own funds.
New Zealand	Corpay protects funds using the segregation method, funds are held designated client accounts and are held separately from the firm's own funds.
Australia	Corpay protects funds using the segregation method, funds are held designated client accounts and are held separately from the firm's own funds.

What are client funds?

United States	Client funds include: — Money belonging to you and received by us in respect of activities which are covered under the relevant regulations; and — There is no limit to the amount of client funds that can be protected, unlike with a bank where funds deposited are only protected by FDIC (Federal Deposit Insurance Corporation) insurance up to USD\$250,000.00. With Corpay, any amount of ADTL-relevant funds held will be safeguarded.
UK and EMEA	Client funds include: — Any money, to which you are beneficially entitled, which we have received from you or on your behalf. It includes bank transfers paid to us; and — There is no limit to the amount of client funds that can be safeguarded and protected, unlike with a bank where funds deposited are only protected up to £85,000. With Corpay, any amount of relevant funds held will be safeguarded.
Canada	For Canadian clients, “client funds” generally refer to monies received by Corpay in connection with, payment execution, For regulatory purposes, certain amounts may be considered “end-user funds,” particularly where funds are held by us for some time prior to settlement or transfer (commonly referred to as funds held “at rest”). Client funds are not deposits, investments, or savings, and Corpay is not a bank or deposit-taking institution. It is important to note the RPAA does not cover funds sent to us in relation to a forward or options contract.
Singapore	Client funds include: — Money belonging to you and received by us in respect of activities which are covered under the relevant regulations; and — There is no limit to the amount of client funds that can be safeguarded and protected. With Corpay, any amount of funds held that are subject to safeguarding will be safeguarded.
New Zealand	Client funds include: — Money belonging to you and received by us in respect of activities which are covered under the relevant regulations; and — There is no limit to the amount of client funds that can be safeguarded and protected. With Corpay, any amount of relevant funds held will be safeguarded.
Australia	Client funds include: — Money belonging to you and received by us in respect of activities which are covered under the relevant regulations; and — There is no limit to the amount of client funds that can be safeguarded and protected. With Corpay, any amount of relevant funds held will be safeguarded.

How are client funds held?

United States	Your client funds will be held in a pooled account pursuant to ADTL. Under a pooled arrangement, client funds of more than one client are held in the same account. The pooled account will be opened and maintained with eligible credit institutions. Client funds are protected by rules laid out in the relevant Regulations.
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UK and EMEA	The client safeguarding account will be opened and maintained only with eligible credit institutions. The names of the credit institutions where we currently have opened safeguarding account funds are set out below: – Barclays Bank Ireland plc (Ireland) for customers of Associated Foreign Exchange Ireland Limited; and – Barclays Bank plc (UK), Barclays Bank Ireland PLC Frankfurt Branch, Barclays Bank Ireland PLC Italy Branch, JP Morgan Chase Bank N.A. for customers of Cambridge Mercantile Corp. (UK) Limited. Client funds are protected by rules laid out in the relevant Regulations which include obligations relating to the segregation of client funds from the firm's own funds, accurate record keeping, regular reconciliations between the firm's records and those of the eligible credit institutions and due diligence on the credit institutions where we place client funds to ensure they are of sufficient financial strength. Transactions in respect of the client safeguarding account will only be undertaken based on an instruction from us and pursuant to our terms of business with you. Corpay, in selecting relevant credit institutions to hold client funds on behalf of its clients, undertake an assessment, at least biannually, covering: – The institution's credit standing having reference to external credit ratings (where available); – Known service levels for the institution (where we have past experience with the institution); and – What your rights would be if the relevant bank were to fail. Once a credit institution has been selected to hold client funds a funds facilities letter confirming specified details, as set out in the Regulations, will be obtained from the institution prior to lodging any client funds with that institution.
Canada	Client funds are typically held in accounts maintained with Canadian or international financial institutions selected through internal due-diligence processes. Client funds may be held on a pooled basis together with funds of other clients prior to settlement. Where funds are considered to be held "at rest" and subject to safeguarding requirements under applicable Canadian law, they may, where required under the RPAA, be placed in designated safeguarding accounts or equivalent arrangements in accordance with regulatory expectations. These arrangements are subject to ongoing development to align with RPAA requirements and related guidance as they come into force. Corpay maintains internal records to track client balances, transaction obligations, and payment instructions during these periods.
Singapore	Your client funds will be held in a pooled account. Under a pooled arrangement, client funds of more than one client are held in the same account. The pooled account will be opened and maintained only with eligible credit institutions. Client funds are protected by rules laid out in the relevant Regulations which include obligations relating to the segregation of client funds from the firm's own funds, accurate record keeping, regular reconciliations between the firm's records and those of the eligible credit institutions and due diligence on the credit institutions where we place client funds to ensure they are of sufficient financial strength.
New Zealand	Your client funds will be held in a pooled account. Under a pooled arrangement, client funds of more than one client are held in the same account. The pooled account will be opened and maintained only with eligible credit institutions. Client funds are protected by rules laid out in the relevant Regulations which include obligations relating to the segregation of client funds from the firm's own funds, accurate record keeping, regular reconciliations between the firm's records and those of the eligible credit institutions and due diligence on the credit institutions where we place client funds to ensure they are of sufficient financial strength.
Australia	Your client funds will be held in a pooled account. Under a pooled arrangement, client funds of more than one client are held in the same account. The pooled account will be opened and maintained only with eligible credit institutions. Client funds are protected by rules laid out in the relevant Regulations which include obligations relating to the segregation of client funds from the firm's own funds, accurate record keeping, regular reconciliations between the firm's records and those of the eligible credit institutions and due diligence on the credit institutions where we place client funds to ensure they are of sufficient financial strength.

The circumstances in which safeguarding of client funds applies and does not apply

United States	Do apply: — To money belonging to you and received by us in respect of activities which are covered under the relevant regulations. Do not apply: — When your funds have been received by us in respect of activities which are not covered under the relevant regulations; — Where funds are transferred to us or are appropriated by us in accordance with the agreed terms of business to discharge your liability to us; and — Where we have completed a payment of the client funds to you, or to a third-party beneficiary nominated by you by written instruction to us.
UK and EMEA	Do apply: — To money belonging to you and received by us in respect of activities which are covered under the relevant regulations. This would apply, for example, to funds deposited with Corpay in order to facilitate settlement of foreign exchange contracts, or make payments to a customer's beneficiary; and — Once a bank transfer is received by us except where it is payable to a third party and transmitted by Corpay to that party. Do not apply: — When your funds have been received by us in respect of activities which are not covered under the relevant regulations; — Where funds are transferred to us or are appropriated by us in accordance with the agreed terms of business to discharge your liability to us (for example where you default on your obligation to settle a transaction with us we will appropriate funds we hold as client funds to the extent required to discharge your liability without prejudice to our other rights under the terms of business, or variation margin); and — Where we have completed a payment of the client funds to you or a third-party beneficiary nominated by you by written instruction to us.
Canada	Client funds handling and safeguarding practices apply to monies received by Corpay in connection with regulated payment and foreign exchange services, and only for so long as such funds are held for the purpose of carrying out the relevant transaction or service. These practices do not apply once funds have been applied in accordance with our terms of business, including where funds are used to settle completed transactions, applied against amounts owed to us, or paid to a client or third-party beneficiary pursuant to instructions. Where regulatory requirements, including under the RPAA, deem amounts to be held end-user funds, such amounts may be subject to additional safeguarding obligations as required by law.
Singapore	Do apply: — To money belonging to you and received by us in respect of activities which are covered under the relevant regulations. Do not apply: — When your funds have been received by us in respect of activities which are not covered under the relevant regulations; — Where funds are transferred to us or are appropriated by us in accordance with the agreed terms of business to discharge your liability to us; and — Where we have completed a payment of the client funds to you, or to a third-party beneficiary nominated by you by written instruction to us. Corpay in selecting relevant credit institutions to hold client funds on behalf of its clients, undertake an assessment, at covering: — The institution's credit standing having reference to external credit ratings (where available).

New Zealand	Do apply: — To money belonging to you and received by us in respect of activities which are covered under the relevant regulations. Do not apply: — When your funds have been received by us in respect of activities which are not covered under the relevant regulations; — Where funds are transferred to us or are appropriated by us in accordance with the agreed terms of business to discharge your liability to us; and — Where we have completed a payment of the client funds to you, or to a third-party beneficiary nominated by you by written instruction to us.
Australia	Do apply: — To money belonging to you and received by us in respect of activities which are covered under the relevant regulations. Do not apply: — When your funds have been received by us in respect of activities which are not covered under the relevant regulations; — Where funds are transferred to us or are appropriated by us in accordance with the agreed terms of business to discharge your liability to us; and — Where we have completed a payment of the client funds to you, or to a third-party beneficiary nominated by you by written instruction to us. Corpay in selecting relevant credit institutions to hold client funds on behalf of its clients, undertake an assessment, covering: — The institution's credit standing having reference to external credit ratings (where available).

What are the main risks or limitations to safeguarding client funds?

United States	— Default risk: Risk that the credit institution at which client funds are held becomes insolvent or otherwise fails and defaults on its obligations. — Operational risk: Risk of loss resulting from inadequate or failed internal processes, people, and systems, or from external events. — Risk of fraud: Relates to intentional deception made for personal gain or to damage another individual. — Risk of pooling: There is a risk that one client's funds will be temporarily used to fund another client's transactions; that Corpay fails to appropriately implement accounting segregation or that the pool may have a deficit.
UK and EMEA	While obligations are imposed on firms to segregate client funds from a firm's own funds, as well as other requirements, it does not protect or guarantee the value of the client funds. — Default risk: Risk that the credit institution at which client funds are held becomes insolvent or otherwise fails and defaults on its obligations. — Operational risk: Risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. — Risk of fraud: Relates to intentional deception made for personal gain or to damage another individual. — Risk of pooling: There is a risk that one client's funds will be temporarily used to fund another client's transactions; that Corpay fails to appropriately implement accounting segregation or that the pool may have a deficit.
Canada	While Cambridge Mercantile Corp. maintains controls intended to support the prudent handling of client funds, clients should be aware that no operational or regulatory framework entirely eliminates risk. Relevant risks may include: — default or insolvency of a financial institution at which funds are held; — operational or systems failures; — fraud, error, or unauthorised activity; and — risks associated with pooled account structures prior to settlement. Canadian law does not provide a statutory guarantee of the return or value of client funds held by Canadian money services businesses or payment service providers.

Singapore	– Default risk: Risk that the credit institution at which client funds are held becomes insolvent or otherwise fails and defaults on its obligations. – Operational risk: Risk of loss resulting from inadequate or failed internal processes, people, and systems, or from external events. – Risk of fraud: Relates to intentional deception made for personal gain or to damage another individual. – Risk of pooling: There is a risk that one client's funds will be temporarily used to fund another client's transactions; that Corpay fails to appropriately implement accounting segregation or that the pool may have a deficit.
New Zealand	– Default risk: Risk that the credit institution at which client funds are held becomes insolvent or otherwise fails and defaults on its obligations. – Operational risk: Risk of loss resulting from inadequate or failed internal processes, people, and systems, or from external events. – Risk of fraud: Relates to intentional deception made for personal gain or to damage another individual. – Risk of pooling: There is a risk that one client's funds will be temporarily used to fund another client's transactions; that Corpay fails to appropriately implement accounting segregation or that the pool may have a deficit.
Australia	– Default risk: Risk that the credit institution at which client funds are held becomes insolvent or otherwise fails and defaults on its obligations. – Operational risk: Risk of loss resulting from inadequate or failed internal processes, people, and systems, or from external events. – Risk of fraud: Relates to intentional deception made for personal gain or to damage another individual. – Risk of pooling: There is a risk that one client's funds will be temporarily used to fund another client's transactions; that Corpay fails to appropriately implement accounting segregation or that the pool may have a deficit.

Controls in place to mitigate risk

United States	Corpay minimizes these risks through its systems and controls including: – Undertaking daily ADTL calculations of the client money held for clients as per our records with the applicable credit institutions; and – Ensuring that we have adequate controls on who can authorize payments from the client safeguarding accounts. Clients should be aware that the information set out in this document in relation to the application of requirements by Corpay, when it applies and how client funds are determined and dealt with by Corpay, is not exhaustive. While obligations are imposed on MSBs to take measures to protect client money pursuant to ADTL, it does not absolutely guarantee the value of the client funds.
UK and EMEA	Corpay minimises these risks through its systems and controls including: – Undertaking due diligence and risk assessments of institutions with whom client funds are held; – Ensuring adequate oversight of client funds is maintained through documented procedures and controls to minimise the risk of loss for clients; – Undertaking daily internal and external reconciliations; and – Ensuring that we have adequate controls on who can authorise payments from the client safeguarding accounts. As a regulated entity, we are obligated to ensure that we have met our regulatory requirements, including detailed requirements in place with regard to the safeguarding of client funds. Clients should be aware that the information set out in this document in relation to the application of safeguarding requirements by Corpay, when it applies and how client funds are determined and dealt with by Corpay, is not exhaustive. In the event that you have any questions please do not hesitate to call your normal Corpay contact.
Canada	Corpay seeks to mitigate these risks through a range of governance, systems, and internal controls, including: – defined approval authorities governing fund movements; – reconciliations and internal reviews of records and obligations; – due diligence on financial institutions used to hold client funds; and – documented policies and procedures designed to support regulatory compliance, including applicable safeguarding frameworks under Canadian law. These measures support the reliable day-to-day operation of our services but do not constitute an absolute guarantee of outcomes in all circumstances.

Singapore	Corpay minimizes these risks through its systems and controls including: — Undertaking due diligence and risk assessments of institutions with whom client funds are held; — Ensuring adequate oversight of client funds is maintained through documented procedures; — Undertaking daily reconciliations of our records and the records of client funds with the credit institution and regular calculations of the client money held for clients as per our records with the applicable credit institutions; and — Ensuring that we have adequate controls on who can authorize payments from the client safeguarding accounts. Clients should be aware that the information set out in this document in relation to the application of safeguarding requirements by Corpay, when it applies and how client funds are determined and dealt with by Corpay, is not exhaustive. While obligations are imposed on Payment Licensees to take measures to protect client money, it does not absolutely guarantee the value of the client funds.
New Zealand	Corpay minimizes these risks through its systems and controls including: — Undertaking daily reconciliations of our records and the records of client funds with the credit institution and regular calculations of the client money held for clients as per our records with the applicable credit institutions; and — Ensuring that we have adequate controls on who can authorize payments from the client safeguarding accounts. Clients should be aware that the information set out in this document in relation to the application of safeguarding requirements by Corpay, when it applies and how client funds are determined and dealt with by Corpay, is not exhaustive. While obligations are imposed on Payment Licensees to take measures to protect client money, it does not absolutely guarantee the value of the client funds.
Australia	Corpay minimizes these risks through its systems and controls including: — Undertaking due diligence and risk assessments of institutions with whom client funds are held; — Ensuring adequate oversight of client funds is maintained through documented procedures and controls to minimize the risk of loss for clients; — Undertaking daily reconciliations of our records and the records of client funds with the credit institution and regular calculations of the client money held for clients as per our records with the applicable credit institutions; and — Ensuring that we have adequate controls on who can authorize payments from the client safeguarding accounts. Clients should be aware that the information set out in this document in relation to the application of safeguarding requirements by Corpay, when it applies and how client funds are determined and dealt with by Corpay, is not exhaustive. While obligations are imposed on AFSLs to take measures to protect client money, it does not absolutely guarantee the value of the client funds.

If you have any questions please do not hesitate to call your normal Corpay contact.

Document from circa 18 Feb 2025, except for the Canada sections; Canada sections tentatively drafted circa 31 Dec 2025 to speak to RPAA.

"Cambridge Global Payments" and "AFEX" are trading names that may be used for the international payment solutions and risk management solutions provided by certain affiliated entities using the brand "Corpay". International payment solutions are provided in Australia through Cambridge Mercantile (Australia) Pty. Ltd.; in Canada through Cambridge Mercantile Corp.; in the United Kingdom through Cambridge Mercantile Corp. (UK) Ltd.; in Ireland and the European Economic Area through Associated Foreign Exchange Ireland Ltd.; in Jersey through AFEX Offshore Ltd.; in New Zealand through Corpay (NZ) Limited; in Singapore through Associated Foreign Exchange (Singapore) Pte. Ltd. and in the United States through Cambridge Mercantile Corp. (U.S.A.). Risk management solutions are provided in Australia through Cambridge Mercantile (Australia) Pty. Ltd.; in Canada through Cambridge Mercantile Corp.; in the United Kingdom through Cambridge Mercantile Risk Management (UK) Ltd.; in Ireland and the European Economic Area through AFEX Markets Europe Ltd.; in Jersey through AFEX Offshore Ltd.; in New Zealand through Corpay (NZ) Limited; in Singapore through Associated Foreign Exchange (Singapore) Pte. Ltd. and in the United States through Cambridge Mercantile Corp. (U.S.A.). Please refer to <http://cross-border.corpay.com/disclaimers> for important terms and information regarding this brochure.