

Conflict of Interest Policy for Capify Markets

Effective Date: 23-12-2024

Website: www.capifymarkets.com

Contact Email: info@capifymarkets.com

1. Introduction

At **Capify Markets**, we are committed to maintaining transparency, fairness, and ethical practices in all our business operations. This **Conflict of Interest Policy** aims to identify, manage, and mitigate potential conflicts that may arise between the Company, its employees, and clients to ensure unbiased and fair service delivery.

2. Purpose of the Policy

The purpose of this policy is to:

- Identify situations where conflicts of interest may arise.
 - Implement measures to prevent conflicts from impacting client interests.
 - Ensure compliance with regulatory obligations and ethical standards.
 - Maintain client trust and uphold professional integrity.
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3. Definition of Conflict of Interest

A **conflict of interest** arises when the interests of **Capify Markets**, its employees, or stakeholders compete with or are misaligned with the interests of a client. Examples include:

- Prioritizing one client's interests over another.
 - Using confidential client information for personal gain.
 - Employees receiving incentives that compromise client outcomes.
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4. Identification of Conflicts

Potential conflicts of interest may arise in the following situations:

- When employees have financial incentives linked to client trading activity.
 - When employees have personal relationships with clients that may influence decision-making.
 - When the Company acts as both broker and counterparty in certain transactions.
 - When proprietary trading occurs alongside client trading.
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5. Managing Conflicts of Interest

To manage conflicts effectively, **Capify Markets** will:

- Implement a **segregation of duties** to ensure transparency.
 - Ensure all employees disclose personal financial interests related to trading activities.
 - Provide regular **training and awareness programs** for staff.
 - Maintain **Chinese Walls** to restrict sensitive information flow between departments.
 - Conduct regular **audits and compliance reviews** to detect and address conflicts.
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6. Disclosure of Conflicts

If a conflict of interest cannot be prevented, **Capify Markets** will:

- Fully disclose the conflict to the affected parties.
 - Seek client consent before proceeding with any affected transactions.
 - Provide sufficient information to enable clients to make informed decisions.
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7. Employee Responsibilities

- Employees must act in the **best interest of clients** at all times.
 - Employees must disclose any personal relationships or financial interests that may cause conflicts.
 - Employees must avoid situations where personal gains conflict with company or client interests.
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8. Client Responsibilities

- Clients are encouraged to ask for clarification if they suspect a conflict of interest.
 - Clients should provide accurate information to assist in conflict identification and management.
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9. Monitoring and Review

- This policy will be reviewed **annually** or whenever significant changes occur in business operations.
 - Regular internal audits will ensure compliance with this policy.
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10. Reporting Conflicts

Clients or employees who suspect a conflict of interest should report it immediately to:

- **Email:** info@capifymarkets.com

All reports will be handled confidentially and investigated promptly.

11. Consequences of Non-Compliance

Failure to comply with this policy may result in:

- Disciplinary action for employees, including termination of employment.
 - Suspension or termination of client accounts.
 - Legal action in cases of severe breaches.
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12. Contact Us

For questions or concerns regarding this **Conflict of Interest Policy**, please contact us:

- **Email:** info@capifymarkets.com
- **Website:** www.capifymarkets.com