



POLICY FOR THE MANAGEMENT OF CONFLICTS OF INTEREST

This Policy for the Management of Conflicts of Interest has been updated as at November 2025 and shall remain effective until a more recent version is released. Safecap Investments Ltd reserves the right to amend or supplement this policy at any time. This Policy does not replace our Investment Services Agreement (Terms and Conditions of Trading) which we ask that you read carefully before you enter into any trading. The prevailing version of this Policy is always available on our website www.scapfx.com

This Policy sets out how we seek to manage conflicts of interest that may arise when we undertake investment services. Treating clients fairly is central to our culture and ethos. We are committed to be acting honestly, fairly and in accordance with the clients' best interests. If any terms of this Policy are unclear to you, you should seek independent legal advice. Please contact us for any questions you may have by using the [Online Contact Form](#).

Safecap Investments Ltd ("Safecap") is a regulated investment services firm, authorized in the conduct of its activities by the Cyprus Securities and Exchange Commission ("CySEC") under license number 092/08.

Safecap's registered address is 10 Simonides Street, CYPRESS TOWER, 2nd& 3rd Floor, Strovolos, 2046, Nicosia, Cyprus.

SCAPFX is a brand and trademark owned and used by Safecap.

Safecap has the sole and exclusive use of the domain 'www.scapfx.com'.

SCAPFX is the new brand and trademark owned and used by Safecap, which previously operated under the Markets.com brand.

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1. INTRODUCTION

Scope

This Policy for the Management of Conflicts of Interest (the “**Policy**”) provides an overview of how Safecap Investments Limited (“**Safecap**” the “**Company**”, “we” or “us”) seeks to manage potential conflicts of interest that may arise when offering investment services to clients. This Policy does not form part of any legal agreement between Safecap and any client or prospective client.

Our business activities

We consider essential that we identify and manage conflicts of interest as they relate to our investment services we carry out at any time.

Safecap’s business relates to enabling primarily retail clients to trade Contracts for Difference (“**CFDs**”) via our online trading platform SCAPFX. We effectively receive, transmit and execute clients’ orders in CFDs.

We act at all times as Principal (counterparty) to the trading of our clients.

We do not offer investment advice or portfolio management services. Our limited investment research is at the date hereof undertaken by third parties and is not addressed to any individual client or their investment objectives.

2. OUR COMMITMENT FOR TREATING CUSTOMERS FAIRLY

Treating Customers Fairly is central to our corporate culture and ethos.

We have a duty to act honestly, fairly, professionally and in the best interests of our clients when dealing with them. Our framework for Treating Customers Fairly is premised on six key principles as follows:

- i) Clients should be confident that treating them fairly is central to our corporate culture and ethos;
- ii) We market products and services to our retail clients having regard to whether they are appropriate for them, based on the targeted clients’ knowledge and experience;
- iii) We provide our clients with clear, fair, not misleading and not aggressive information at all times: before, during and after their trading with us;
- iv) We do not offer clients investment advice. We communicate non-client specific market information and “colour” from sources which we reasonably believe, acting diligently, are credible;
- v) We provide high levels of client service and experience as measured by best possible prices, speed of execution, quality of our knowledge on client enquiries. We do not promise what we cannot deliver. We are not aggressive or misleading in our dealings with clients and do not permit business or other introducers to be so either;
- vi) We are transparent on the basis that clients deal with us, especially where clients trade with us on a principal-to-principal basis. We advise clients of conflicts and the Over the Counter (“**OTC**”) and non-transferability nature of our CFD product suite.

3. OUR CODE OF CONDUCT

Safecap has place a Code of Conduct applicable for the employees of the Company. The Code of Conduct deals with how Conflicts of Interest are managed internally and the processes, procedures adopted by the Company to this end. In relation to conflicts of interest, key points to note from the Code of Conduct indicatively include:

- i) All employees are bound by the terms of the Code of Conduct and have to annually acknowledge their continuous adherence to this Code of Conduct.
- ii) All employees should at all times be in full compliance with internal policies and procedures.
- iii) Employees are advised through the Code of Conduct how to identify conflicts of interest and how to escalate these to their line management and the Compliance Department.
- iv) All employees are bound by professional secrecy. Confidential information is only to be shared if essential for performing their specific duties and responsibilities.
- v) All employee trading or participation in businesses that compete with the Company need to receive prior clearance from the Compliance Department in line with Safecap’s Personal Account Trading policy.
- vi) Executive or non-executive roles which are not related to the Company, are only possible with prior permission, unless this relates to social causes.
- vii) Employees are prohibited from personally trading using the knowledge gained from inside/non - public information.

4. THE LEGAL AND REGULATORY FRAMEWORK UNDER WHICH THIS POLICY IS ISSUED AND IMPLEMENTED

This Policy is issued pursuant to, and in compliance with the requirements of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU ("MiFID II"), the Law of the Republic of Cyprus No 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets which transposed MiFID II into Cyprus legislation and the Investment Services and Activities and Regulated Markets Law of the Republic of Cyprus Law No 144(I)/2007 to the extent it remains applicable after coming into force of MiFID II.

Furthermore, this Policy complies with Section 2 of the Questions and Answers Document of the European Securities and Markets Authority ("ESMA") issued on 11 October 2016 with reference ESMA/2016/1454 with respect to the provision of CFDs and other speculative products to retail investors. Section 2 of this Document relates to "Conflicts of interest arising from business models that may be adopted by firms offering speculative products to retail investors".

In this Policy, we collectively refer to all the above legislations, regulations and guidelines as "Regulations".

5. SAFECAP EMPLOYEE PERSONAL ACCOUNTS

Employees may only undertake personal investment activities that do not breach applicable laws or regulations, do not unduly distract from their employment responsibilities and do not create an unacceptable risk to the Company's reputation. Transactions should also be free from business and ethical conflicts of interest. Employees must never misuse proprietary or Client confidential information in their personal dealings and must ensure that Clients are never disadvantaged as a result of their dealings. Employees are not permitted to hold an account with Safecap and when it comes to personal transactions, they are required to follow the Company's Personal Account Dealing Policy. Any employee who is interested in dealing personally, should first report it to the Compliance department before start placing any trades.

6. IDENTIFICATION AND NATURE OF POTENTIAL CONFLICTS OF INTEREST AND THEIR SOURCES AND OUR APPROACH TO MANAGING THESE

Conflicts of interest are unavoidable in financial institutions such as Safecap with a diverse range of activities, including those trading as Principal with their clients. Safecap seeks to manage conflicts of interest fairly at all times.

Safecap hereby identifies and discloses a range of circumstances which may give rise to a conflict of interest and potentially but not necessarily be detrimental to the interests of one or more clients. Such a conflict of interest may arise if Safecap or any person directly or indirectly employed, remunerated or controlled by Safecap and its affiliates, or a client, is likely to make a financial gain, or avoid a financial loss, at the expense of a client.

It may not be possible to prevent conflicts of interest from arising and certain conflicts may be inherent due to the Company's business profile and activities. In that case, Safecap will endeavour to manage the conflict of interests by undertaking the following measures:

- i. Employee Signoff - Safecap insists that all employees sign and adhere to the company Policies;
- ii. Disclosure to the Client - Safecap will clearly disclose the general nature and source of the conflict of interest to the Client before undertaking business for the Client. The disclosure will be made in writing and include sufficient details to enable the Client to take an informed decision about the service in the context of which the conflict of interest has arisen;
- iii. Establishing an information barrier (Chinese wall) – Safecap will require information held by one part of the business to be withheld from, or not used by, persons in another part of the business;
- iv. Declining to provide the service - If it is not possible to avoid or manage a conflict of interest, Safecap may have no choice but to decline to provide the service requested;
- v. Annual checks to ensure that appropriate systems and controls are maintained and are reported to Safecap's Board of Directors;
- vi. Prohibition of external business interests conflicting with Safecap's interests as far as Safecap's officers and employees are concerned, unless a Board of Directors approval is provided;
- vii. Gifts and Entertainment Policy – Safecap shall only allow gifts to be received by Safecap employees in accordance with Safecap's Gifts and Entertainment Policy; and
- viii. Whistleblowing Policy - If any employee believes Safecap is acting wrongly and incorrectly with regards to any regulatory procedures, they may act by contacting the CySEC in confidence.

We also map out here below our approach to managing these indicative areas of conflicts of interest:

Circumstances of potential conflict of interest*	Our approach to managing these (indicative actions)
<p>When a client enters into any order to Buy or Sell a Contract for Difference ("CFD") on our trading platforms, the client trades with us as their counterparty. We are the Principal to each trade that the client enters.</p> <p>This means that:</p> <ul style="list-style-type: none"> • The client may only close each position he trades with us. • The client's positions are not transferable to any other regulated investment firm. This is a major difference to when clients trade for example in Shares. In such cases, clients can move their holding in Shares to be traded through another investment firm – broker. In CFDs, clients can only trade / close their position with the investment firm – broker they initially opened their position with. <p>If clients make profits on their trading, we lose. If the clients register losses on their trading, this means we profit.</p>	<ul style="list-style-type: none"> • We have introduced an Order Execution Policy that sets out our obligations in delivering Best Execution to our clients. • Best Execution is the process by which Safecap seeks to obtain the best possible result when executing client orders. • Generally, Best Execution is determined on the basis of the total consideration paid to or by the client, unless the objective of execution of the order dictates otherwise. • Prices quoted for CFDs are based on the published prices of underlying instruments on the regulated exchanges where such instruments are regularly traded or, with respect to Foreign Exchange, based on the aggregation of prices received from global investment banks and other liquidity providers. • Monitoring is in place to ensure that executed prices are within the market and not excessive comparing market prices (comparison of executed price versus a benchmark). • Hedging unless performed back-to-back it will be performed solely upon the Company reaching its risk limits (based on prudent financial risk management) and therefore, it will not impact the price offered to the client. • We disclose our Spreads and charges on our trading platform SCAPFX. • We clearly disclose the percentage of loss as part of the standardized risk warning required for CFDs. • Our marketing communication is developed on the basis of being fair, clear and not misleading to clients and is issued following approval by the Compliance department. • Execution of client trade is automated through the platform with no human intervention and clients would not be treated differently, including in terms of pricing and costs.
<p>The settings of the trading platform may be at non symmetrical parameters. A key area relates to trading slippage. Slippage refers to the difference a client expects to pay for a trade and the actual price at which the trade is executed. Slippage occurs because there is a slight time delay between the client entering the trade and the time the broker receives the order. During this time delay, the price may have changed. Slippage can be much higher in fast-moving, volatile markets. It can either work in favor of or against the client. Conflicts may arise if the application of slippage parameters is not symmetrical. That is the broker enables a higher negative slippage for the client whilst limiting the client's potential profit in positive slippage.</p>	<ul style="list-style-type: none"> • All trading platform parameters are symmetrical. • There is also full disclosure of the risk of negative slippage as well as positive slippage in the Order Execution Policy and in the Terms & Conditions. • We have monitoring procedures in place in order to ensure that the slippage parameters are indeed symmetrical.

<p>Safecap, its employees, third parties acting on behalf of or on the basis of specific agreements with Safecap (such as introducers, websites and social media) may have an interest in maximizing trading volumes in order to increase dealing revenues or their variable remuneration pay. This may be inconsistent with the need for clients to trade prudently or for minimizing clients' transaction costs. Safecap employees may also receive bonuses or other form of variable pay that links to the trading performance of clients.</p>	<ul style="list-style-type: none">Employees who receive any form of variable pay (including performance related pay) are subject to limitations and enhanced monitoring.Incidents of conflicts of interest or any other compliance breach lead to reduction and / or not granting the variable remuneration and / or termination of employment and therefore, the incentive is for staff to comply with the Company's requirements to avoid any repercussions.Awards are structured so as to have regard to long term client satisfaction as opposed to short term Company gains, recognizing that our long term success is premised on maintaining satisfied clients over the long term.We do not engage with third party introducers which operate call centres.Partners, including affiliates, intermediary service providers and, business introducers may receive volume- based remuneration. We limit the types of remuneration which can be received to types which do not generate any additional conflict of interest, thus minimizing any additional conflict which may negatively impair a client. For example, profit sharing arrangements are prohibited in relation to clients' activity.Any fees paid to a third party are part of the fees already charged by a client therefore, a client will not incur any further costs due to such remuneration arrangements.Any payment to a third party is reviewed and approved by a member of the Finance Department, while a dedicated member of the Compliance Department monitors on an on-going basis the remuneration arrangements with third parties.Any websites, affiliates or other online introducers do not have any role in our assessment of the clients' knowledge and experience for onboarding purposes, such decision to onboard being at the entire discretion of Safecap.Local registrations with regulatory authorities have to be adhered to by affiliates where appropriate.
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Circumstances of potential conflict of interest*	Our approach to managing these (indicative actions)
<p>Where investment research or market information is provided this does not take account of the circumstances and investment objectives of individual clients. Safecap or legal and natural persons affiliated with it may have a position or trade in financial instruments that may be covered by such investment research.</p>	<ul style="list-style-type: none"> • We do not offer any form of investment advice and our disclaimers make this fact explicitly clear. • Market research is performed on behalf of Safecap by third parties who are segregated from our Dealing, Sales and Retention employees. • We remunerate such third parties on the basis of fixed fee arrangements which are not related to the trading generated from our clients. • Other than being a Principal to clients' trading or hedging for the market risk emanating for this trading, neither Safecap or its holding company or affiliates trade in any form of financial instrument for the purpose of short term financial gains.
<p>Employees or business associates may have a personal holding in a security of a company and where such employees or business associates are involved in executing clients' orders, and – in breach of internal policy – encourage or push the client to trade in such a security.</p>	<ul style="list-style-type: none"> • Our Code of Conduct states clearly that we do not engage in investment advice and stipulate the consequences for any breach of this requirement. • We monitor client communications to ensure that our staff do not engage in any form of investment advice. • All employees are bound by our Personal Account Trading Policy as in force and effect from time to time. • Other indicative points as set out in the Code of Conduct extracts of which are set out above.
<p>The Company may act as a manufacturer and/or distributor of its products, defining its target market, and therefore has an interest in maximizing its trading volumes by selling its products and services to a large variety of persons. Such incentive may be conflicting with the Company's obligation to assess the appropriateness of each prospective client. Such appropriateness assessment will determine whether a client is appropriate to use the Company's services and is conducted at the onboarding stage.</p>	<ul style="list-style-type: none"> • The scoring methodology for the assessment of appropriateness was conducted following consultation meetings with all stakeholders within the Company under the direction of the Compliance Department so as for us to be in a position to reasonably determine whether complex Financial Instruments such as the CFDs are appropriate for the client to invest in. • Checks are performed on an on-going basis to ensure the system reflects the correct scoring and applies all rules set by the Company. • The Compliance Department performs sample reviews for each of the Company's Appropriateness categories (Experienced, Less Experienced, Inexperienced) to evaluate whether the client's categorization following the appropriateness scoring is in line with the latest scoring rules of the Company. • The assessment is performed in an automated way, thus Safecap and its employees are not able to manually interfere in the process. • On an ongoing basis and at least annually the Company performs an analysis and review of its appropriateness assessment and scoring methodology to determine its adequacy.

Circumstances of potential conflict of interest*	Our approach to managing these (indicative actions)
<p>A potential conflict of interest that may impact the client is how Safecap onboards new clients. It is in Safecap's commercial interest to increase the client base, which drives revenue and growth and the number of clients onboarded is a key metric for how Safecap measure performance. However, onboarding a client may not always be in the client's best interest.</p> <p>Furthermore, Safecap is an order-execution only dealer which means that the Company does not provide a suitability review of any trades requested by the clients, while the products offered are complex and high risk, and may not be appropriate for everyone.</p>	<ul style="list-style-type: none"> As part of the account application, applicants provide various background information that allows the Company to assess their appropriateness to maintain an account both in terms of understanding the associated risks and ability to financially withstand the risks. The appropriateness assessment is dictated by the Compliance department, the assessment is performed automatically by the system and not manually by Company employees to ensure it is performed in accordance with the system methodology and remove any element of manual interference. The Company further includes, under the guidance of the Compliance department, checks around the Company's target market rejecting any customers found not to have the profile or risk appetite to trade in CFDs/Spread bets. The Company clearly informs clients of the risks associated with the Company's products, to ensure that the client understands the risks. This is accomplished through the use of prominent risk warning disclaimers and disclosures across the website and promotional materials If the client would like to receive advice in respect of the suitability of that trade to his personal circumstances, then the client should deal with a full-service investment advisor that offers a suitability review of each trade.
<p>The way in which Safecap remunerates or offers financial incentives to the employees could conflict with their duty to act in the best interests of clients. For example, employees in the dealing department may be incentivised to not act in the best interest of the clients when executing their trades and setting execution parameters to maximise their remuneration.</p>	<ul style="list-style-type: none"> No employees of the dealing department receive any form of commissions and there is no formula to calculate any annual discretionary bonus to firm profitability. Same for any third parties referring customers to the Company, receive one off fixed payment for the referral to remove any incentivisation to act in a misleading or inappropriate way such as offering investment advice. All client communication is recorded and monitored to ensure that interactions are fair, clear and not misleading. Particularly, monitoring is in place to ensure to inappropriate or unauthorised contact and that no unauthorised investment advice or misleading information were provided. Furthermore, disclosures are published on the website, and all staff are bound by our Code of Conduct.

* Note that the above are only indicative areas of potential conflicts of interest.

7. DISCLOSURE OF CONFLICTS OF INTEREST

In the case where the measures put in place are not sufficient to avoid or manage a conflict of interest relating to a client, Safecap will disclose the conflict of interest before undertaking further business with the client.