



FSP License no. 23497

Regulated by the Financial Sector Conduct Authority

CONFLICTS OF INTEREST POLICY

V1.1

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1. Introduction

Rynat Capital (Pty) Limited (hereinafter “the Company” or “We”) is an Investment Firm regulated by the the Financial Sector Conduct Authority (“FSCA”) with Licence number 23497.

Rynat Capital (Pty) LTD (hereinafter called the “Company”) is governed by Financial Advisory and Intermediary Services Act, 2002 (Act No. 37 of 2002) as amended and/or replaced.

This Policy provides an overview of how the Company 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 the Company and any client or prospective client.

2. Scope

The scope of this Policy is to ensure that the Company’s conflicts of Interest are identified, managed and, where necessary, disclosed to ensure the fair treatment of all Clients, to reduce the risk of Client disadvantage and reduce the risk of legal liability.

The Policy applies to all the Company’s directors, officers, employees, agents and any person directly or indirectly linked to the Company (hereinafter “Related Person”) and refers to all interactions with all clients.

The Company is committed to act honestly, fairly, professionally and in the best interests of its clients, and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services related to such investment services.

3. Identification of Conflicts of Interest

For the purposes of identifying the types of conflict of interest that may arise in the course of providing investment and ancillary services, or a combination thereof, and whose existence may conflict with the interests of a client, the Company takes into account, by way of minimum criteria, the question of whether the Company or a relevant person, or a person directly or indirectly linked by control to the Company, is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- a) the Company or any related person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- b) the Company or any related person has an interest in the outcome of a service provided to the Client or of a transaction carried out on behalf of the client, which may be different from the client’s interest in that outcome;
- c) the Company or any related person has a financial or other incentive to favor the interest of another client, or group of clients, over the interests of a particular client or group of clients;
- d) the Company or any related person carries on the same business as the Client;
- e) the Company or any related person receives or will receive an inducement in relation to a service provided to the client, in the form of monetary or non-monetary benefits or services.

4. Procedures to Manage Conflicts of Interest

The Company has in place organizational and administrative arrangements and has introduced procedures and controls to identify, manage and control conflicts of interest, such as:

- a) Procedures prohibiting employees of the Company to trade in financial instruments offered by the Company or similar to those offered by the Company, whether with the Company or with any third party, without a specific authorization by the Company.
- b) The separate supervision of Relevant Persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company.
- c) Chinese walls restricting the flow of confidential and inside information within the Company.
- d) Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
- e) A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.
- f) Establishment of in-house Compliance Function to monitor and report on the above to the Company’s Board of Directors.
- g) Appointment of Internal Auditor to ensure that appropriate systems and controls are maintained and report to the Company’s board of directors.
- h) Establishment of the four-eyes principle in supervising the Company’s activities.

The below are indicative areas of potential 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 his/her 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. In CFDs, clients can only trade / close their position with the investment firm – broker they initially opened their position with. • If clients make profit or loss on their trading the Company gains only its markups. 	<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 the Company seeks to obtain the best possible result when executing client orders. • Generally, Best Execution is determined based on the total consideration paid to or by the client, unless the objective of execution of the order dictates otherwise. • Prices quoted for CFDs on Foreign Exchange is based on the aggregation of prices received from global investment banks and other liquidity providers • We disclose our Spreads and charges on our trading platform • Our marketing communication is developed based on being fair, clear and not misleading to clients and is issued following approval by the Compliance department.
<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</p>	<ul style="list-style-type: none"> • All trading platform parameters are symmetrical.

<p>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>	
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<p>The Company, its employees, 3rd parties acting on behalf of or based on specific agreements with the Company (such as introducers, websites and social media) may have an interest in maximizing trading volumes 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. The Company's employees may also be awarded based on quantitative criteria 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 vesting periods with malus and claw back provisions. • Incidents of conflicts of interest or any other compliance breach lead to suspension of unvested rights and / or claw back of any awards and / or termination of employment. • Awards are structured 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 centers. • 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 Safe cap. • Local registrations with regulatory authorities have been adhered to by affiliates where appropriate.
<p>Where investment advice, research or market information is provided this does not take account of the circumstances and investment objectives of individual clients. The Company 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"> • When we offer investment advice we shall disclose whether the advice is provided on an independent basis and whether the advice is based on a broad or on a more restricted analysis of different types of financial instruments and, in particular, whether the range is limited to financial instruments issued or provided by entities having close links with the Company or any other relationship . • Market research is performed on behalf of the Company by 3rd parties who are segregated from our Dealing, Sales and Retention employees. • The Company remunerates such 3rd 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 the Company or its holding company or affiliates trade in any form of financial instrument for the purpose of short-term financial gains.
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.	<ul style="list-style-type: none"> • We monitor client communications to ensure that our staff do not engage in any form of investment advice. • Other indicative points as set out in the Code of Conduct extracts of which are set out above.

5. Disclosure of Conflicts of Interest

In the case where the measures put in place are not sufficient to ensure that conflicts with the interests of the client will be prevented, the Company will, if it is aware of it, will disclose the conflict of interest prior to undertaking investment business for that client.

6. Monitoring

The Company undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate. The Compliance Department undertakes to carry out an annual review of actual and potential Conflicts and the way they are managed or mitigated. The Board of Directors is advised accordingly, while the review considers whether there are any trends, issues arising from conflicts between the current regulation governing the business activities of the Company and the Company's policies.

7. Updates

The Company will perform a periodical review of this Policy, at least once a year. The Policy is in line with the Company's operational model, and therefore in case of any changes in the operations, these will be properly reflected in this policy. The most up-to-date version of the Policy can be found on our Website.