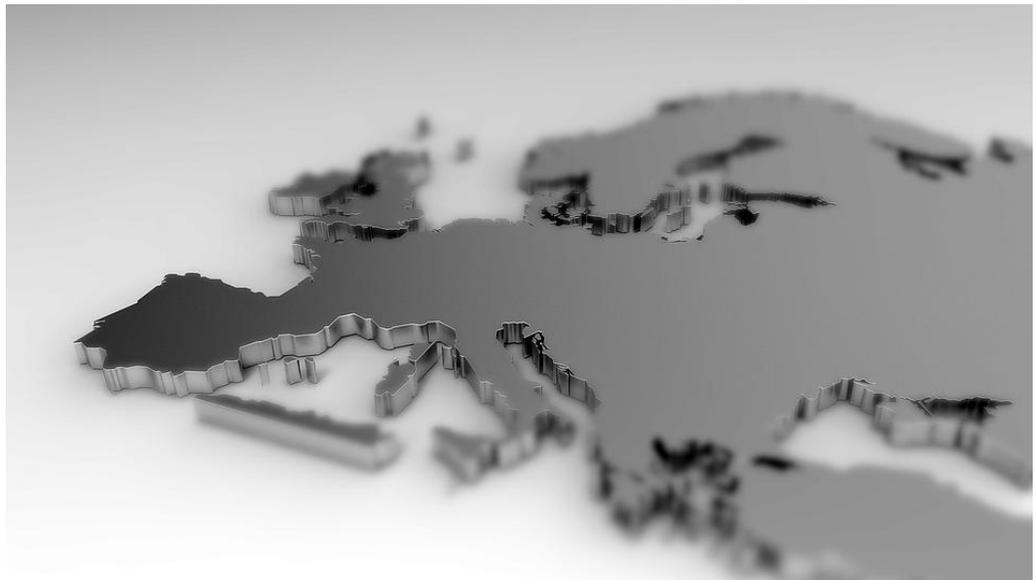


FAIR TREATMENT OF CLIENTS POLICY



January 2018

Spot Capital Markets Ltd

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PURPOSE

Spot Capital Markets Ltd (the “Company”) is fully committed to integrity and providing the highest standards of client service delivery, by adherence to the letter and spirit of applicable laws and regulations.

The Fair Treatment of Clients Policy (the “Policy”) is centered around the guidance provided by our regulator, the Cyprus Securities and Exchange Commission (the “CySEC”), to ensure we consistently deliver fair outcomes to our clients and take responsibility for the Company and staff (at all levels) providing enhanced service quality to clients, based on a culture of fairness and transparency. The Company takes the requirements of the CySEC seriously, in particular, the requirement to treat clients fairly.

INTRODUCTION

The Company shall commit to dealing fairly and transparently with clients, and shall not take advantage of anyone through manipulation, concealment, improper handling of confidential information, misrepresentation of material facts or other unfair dealings or practices.

The Company shall pay due regard to the information needs of the clients and communicate such information in a clear, fair and not misleading manner.

OUR POLICY

The Company shall apply the following principles to ensure fair treatment of clients:

- ❖ Integrity: The Company shall conduct its business with integrity
- ❖ Skill, care and diligence: The Company shall conduct its business with due skill, care and diligence
- ❖ Management and control: The Company shall take reasonable care to organize and control its affairs responsibly and effectively, with adequate risk management systems
- ❖ Financial prudence: The Company shall maintain adequate financial resources
- ❖ Market conduct: The Company shall observe proper standards of market conduct
- ❖ Clients’ interests: The Company shall pay due regards to the interests of its clients and treat them fairly
- ❖ Communications with clients: The Company must pay due regards to the information needs of its clients, and communicate information to them in a way which is clear, fair and not misleading
- ❖ Relations with regulators: The Company shall deal with its regulators in an open and cooperative way, and shall disclose to the appropriate regulator anything relating to the Company of which the regulator would reasonably expect notice.

OUR SERVICE

The Company's approach for fair treatment of clients and provision of high quality service is accomplished in the following ways:

- ❖ Ascertainment of the appropriateness of the requested service for all new clients prior to offering them a trading account, to ensure that it is in line with their knowledge and experience
- ❖ Continuous efforts to understand the needs of the clients
- ❖ Keeping of the clients fully informed in a clear and fair manner that is unambiguous and not misleading
- ❖ Ensuring that the Company's services are delivered with clarity and transparency and do not contain hidden conditions or rely on complex technical definitions
- ❖ Ascertainment of the clients' awareness of the risks associated with the Company's services at the outset of the relationship
- ❖ Ensuring that the service and risk information remain clear and prominent at all times
- ❖ Informing the clients of a potential conflict of interest as soon as possible upon becoming aware of it

COMPLAINTS MANAGEMENT

The Company aims at handling the complaints of its clients in a transparent manner, and to address and resolve them according to its defined Complaints Management Process, by applying sound judgment and putting clients first.

The Company shall ensure closure of all complaints to the clients' satisfaction. The Company's ultimate endeavor is to ensure it reaches a situation where its clients do not have to escalate a complaint to get an effective redressal, hence, it has put a robust mechanism to handle complaints, review them from a point of view of understanding reasons for the complaint and working on prevention of recurrence thereof.

The complaints are analyzed to identify (i) client service in areas in which the complaints are frequently received, (ii) frequent sources of complaint, (iii) systemic deficiencies, and (iv) for initiating appropriate action to make the complaints redressal mechanism more effective.