



NOVA SPIRE
—CAPITAL—



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Nova Spire Capital (Pty) Ltd Registration Number 2026/097975/07. Trading and investing involve risk. Past performance is not indicative of future results.

JUNE 2026 | NOVA SPIRE CAPITAL

Conflicts of Interest Policy

How Nova Spire Capital identifies, prevents, manages and where necessary discloses conflicts of interest in the conduct of its business.

Issuer	Nova Spire Capital (Pty) Ltd J/R of BOF Asset Management (Pty) Ltd
Regulator	Financial Sector Conduct Authority (FSCA) — FSP 53819
Registered Office	1002 Clifton ave, Lyttelton Manor Ex 3, Centurion, Gauteng, 0157, South Africa
Document Date	June 2026
Last Revised	17 June 2026
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1. Introduction

Nova Spire Capital (“the Company”, “we”, “our” or “us”) is a trading name of Nova Spire Capital (Pty) Ltd J/R of BOF Asset Management (Pty) Ltd, authorised and regulated by the Financial Sector Conduct Authority (FSCA), licence number 53819. 1002 Clifton ave, Lyttelton Manor Ex 3, Centurion, Gauteng, 0157, South Africa. We provide online OTC products including Contracts for Difference, Spread Trades and Margin FX to retail and professional clients.

2. What Is a Conflict of Interest

A Conflict of Interest (“Conflict”) arises when we, an associated company or any of our employees face situations where multiple influences compete, potentially affecting decision-making or outcomes in our business affairs. These influences can include legitimate interests and harmful ones such as personal gain.

Conflicts may occur in various scenarios, including:

- Between the Company and a client;
- Between two or more clients;
- Between an employee and a client;
- Between an employee and the Company; or
- Between the Company and its related entities.

To address conflicts effectively, we have established comprehensive policies and procedures designed to identify, prevent, manage and — where appropriate — disclose Conflicts. These policies are reviewed at least annually.



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3. How We Deal With Conflicts

Our organisational structures are designed to discourage behaviours that could result in Conflicts and to ensure such behaviours are not incentivised or rewarded. We take measures to restrict the flow of information to certain employees where necessary to protect our clients' interests.

We maintain procedures to:

- Identify all potential types of Conflicts that may arise within the scope of our activities;
- Maintain registers of identified potential Conflicts;
- Prevent and/or manage Conflicts on an ongoing basis;
- Disclose Conflicts where appropriate; and
- Document all instances of Conflicts that cannot be effectively managed.

4. Identifying Conflicts

We consider the types of potential Conflicts relevant to the services and activities we carry out. Potential Conflicts are reviewed, for example, when developing new products, establishing or amending remuneration, revenue sharing or joint venture arrangements, or when transferring or outsourcing activities.

Where Conflicts involve clients, we assess whether any employee:

- Stands to gain financially or avoid a financial loss at the expense of a client;
- Has an incentive to favour the interest of one client or group of clients over another;
- Holds interests distinct from those of the client in the outcome of a service or transaction;
- Engages in the same business as the client; or
- Receives, or will receive, an inducement related to services provided to the client.

We maintain internal registers documenting and evaluating all identified potential Conflicts. These registers outline the controls in place to prevent or manage each type of Conflict and undergo regular oversight and review by senior management.

5. Preventing or Managing Conflicts

We structure employee remuneration, deployment and management to mitigate the risk of Conflicts. Where necessary, potential Conflicts are identified and addressed before committing to any activity or transaction.

In certain situations we may decline to proceed with an activity or transaction, where:

- The Conflict is deemed too significant;
- Confidentiality obligations prevent adequate disclosure; or
- Informed consent cannot be obtained, or is deemed insufficient to manage the Conflict.

Our Compliance department is the point of escalation for significant Conflicts. Cross-business Conflicts are escalated to the Head of Compliance. Written reports detailing services and activities reflected in the Conflicts Register are presented to senior management at least annually.



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6. Disclosure

We may provide clients with general disclosures regarding certain types of potential Conflicts, explaining how they are managed (for example, through the separation of businesses or measures to prevent unauthorised sharing of confidential information). Where we have made all reasonable efforts to prevent or manage a Conflict but the risk of damage to a client's interests remains, we will make a specific disclosure to the client.

Specific disclosures will be made before the conclusion of a contract, using an appropriate medium, and will include sufficient detail, tailored to the nature of the client, to enable the client to make an informed decision.

Confidentiality obligations to one party may limit the disclosures we can make to another.

7. Employees

The Company expects its employees to exercise good judgement and uphold integrity by:

- Taking necessary measures to prevent Conflicts (including refraining from personal account dealings where applicable); and
- Proactively escalating Conflicts that arise.

Employees are prohibited from participating in any matter where they have a personal interest, or from making commercial decisions related to their personal or external business affairs on behalf of the Company, until the Conflict has been effectively managed.

8. Policy Review

This policy was last revised on 17 June 2026 and is reviewed at least annually.

Nova Spire Capital J/R of BOF Asset Management (Pty) Ltd, registration number [2026/097975/07], is authorised and regulated by the Financial Sector Conduct Authority (FSCA), FSP 53819. This document forms part of the legal terms governing the relationship between Nova Spire Capital and its clients and should be read in conjunction with the Client Agreement and other policies published at www.novaspirecapital.com.