




EMKAP LTD

DISCLOSURE POLICY

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EmKap Limited is licensed and regulated by the Cyprus Securities and Exchange Commission (CySEC) under license number 077/06. This Disclosure Policy is issued in accordance with the requirements of the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017) and Directive DI87-01, implementing the Markets in Financial Instruments Directive (MiFID II).

This policy outlines the disclosures made to potential and existing clients concerning:

- The services we provide
- The financial instruments offered
- All costs and associated charges

1. Service Disclosures

We provide the following information to potential and existing clients prior to the provision of investment services:

1.1. Nature and Scope of Services

- Description of the investment and ancillary services offered.
- Client classification (Retail, Professional, Eligible Counterparty) and its impact on investor protection.
- Execution-only vs. advisory vs. portfolio management service distinctions.
- Whether investment advice is independent or non-independent.

1.2. Use of Third Parties

- Any reliance on third parties for execution, custody, or research.
- Summary of our outsourcing arrangements (where applicable).

1.3. Safeguarding of Client Funds and Financial Instruments

- Explanation of how client assets are held (e.g., segregation in client accounts).
- Information on deposit protection or investor compensation schemes (e.g., ICF coverage).

1.4. Conflicts of Interest

- Summary of our Conflicts of Interest Policy.

- Procedures for managing or disclosing material conflicts.

2. Financial Instrument Disclosures

In compliance with MiFID II and CySEC, EMKAP Limited discloses relevant information to allow clients to make informed investment decisions.

2.1. Nature and Risks of Financial Instruments

For each class of financial instrument offered, clients are informed of:

- The nature and key features of the product (e.g., shares, bonds, derivatives).
- Relevant risks (e.g., market risk, credit risk, liquidity risk, leverage).
- The potential loss of the entire invested capital.
- Price volatility and complexity (including whether it is considered complex under MiFID II).

2.2. Appropriateness and Suitability Assessments

- For complex instruments, we assess the client's knowledge and experience.
- For advisory or portfolio management services, a full suitability assessment is conducted.

2.3. Product Governance

- Disclosure of the target market for each financial instrument.
- Where we are not the manufacturer, we disclose available information from the product issuer.

3. Costs and Charges Disclosures

Clients are provided with full disclosure of all direct and indirect costs and their cumulative effect on return.

3.4. Pre-Contractual Cost Disclosures

Before entering into an agreement, we provide:

- Itemized costs: service fees, commissions, mark-ups/mark-downs, custody fees, FX conversion charges, etc.
- Third-party payments received or paid.

- Illustrations showing the cumulative impact of costs on returns.

3.5. Post-Trade Cost Disclosures

Clients receive a detailed report via the portal including:

- All fees paid by the client.
- Total cost expressed in monetary and percentage terms.
- Any inducements or third-party fees received.

3.6. Ongoing Service Fees

- Disclosure of advisory or portfolio management ongoing charges.
- Basis of calculation (e.g., AUM %, fixed fee, transaction-based).

4. Policy Updates

This policy is reviewed and updated regularly to ensure ongoing compliance with CySEC and MiFID II requirements. Material changes will be disclosed promptly via our website and direct communication where necessary.