

# Surveill Maps the Conflict Gap Across the CySEC-Regulated CFD/FX Sector as Inspectors Prepare to Arrive

*Findings from 154 CySEC-regulated firms across 45 conflict-of-interest controls aligned to CSA 2026 priorities*

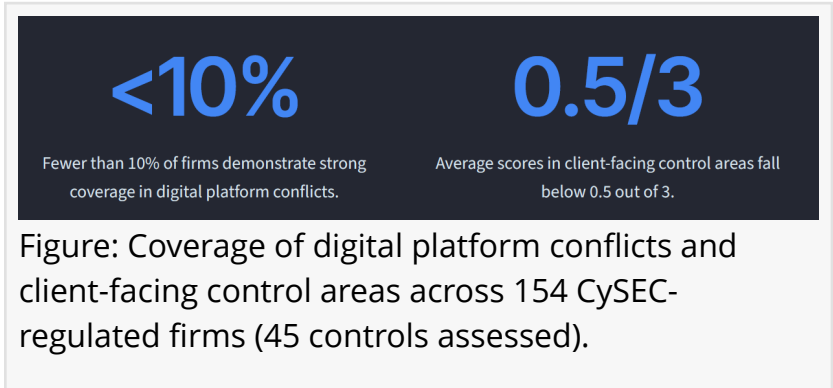
CORAL GABLES, FL, UNITED STATES, April 7, 2026 /EINPresswire.com/ -- As Cyprus Securities and Exchange Commission ("CySEC") prepares on-site visits and desk-based reviews under European Securities and Markets Authority's 2026 Common Supervisory Action ("CSA") on conflicts of interest, Surveill has published a sector-wide analysis examining how firms' conflict frameworks align with current supervisory focus areas.

Surveill's [Compliance Risk Intelligence](#) division assessed 154 CySEC-regulated CFD/FX firms across 45 conflict-of-interest controls aligned to MiFID II requirements and mapped to the three CSA 2026 supervisory priorities. The findings, published in [The Conflict Gap](#), reveal a consistent pattern: the closer a control is to the client's experience, the less developed its coverage tends to be.

"Regulators are no longer asking whether a policy exists. They are asking whether it governs the business as it actually operates today. Those are very different questions," said Aydin Bonabi, CEO of Surveill.

Digital platform controls, the environments where clients interact with products, show the lowest levels of coverage across all 45 controls assessed, with an average score of 0.33 out of 3.0. Fewer than 10% of firms demonstrated strong coverage. In 90% of cases, policy language did not explicitly address how platform design choices may influence client outcomes. As the report states: "The platform has become the primary conflict environment, and almost no firm has updated its language to reflect that reality."

The same pattern extends to distribution. Affiliate networks and influencer-driven acquisition channels, which play an increasing role in how retail clients are found and directed toward



products, are not consistently reflected in formal conflict frameworks. As the report observes: "That misalignment is a conflict. Almost no firm names it as one."

Governance frameworks generally perform well against traditional measures. Conflicts registers, escalation processes, and defined accountability structures are broadly present. But a framework can only manage what it recognizes. Platform-driven conflicts do not appear in the language. Affiliate and influencer-driven distribution conflicts are absent or generalized. In the most striking case identified across the assessment, one major CySEC-regulated firm had not updated its conflicts of interest policy in ten years. As the report concludes: "Low scores across platform and inducement controls are not framework gaps. They are governance gaps. The architecture is present. The field of view is too narrow."

"What makes this analysis different is consistency," said Asli Bonabi, Chief Technology Officer at Surveill. "Each finding is grounded in a traceable regulatory framework aligned with supervisory priorities, making the results explainable, repeatable, and directly relevant to how regulators assess risk."

For firms with material gaps, timing matters. The window for proactive mitigation is open. It will not remain open once a review begins.

The Conflict Gap report is available at [www.surveill.ai/compliance-risk-intelligence](http://www.surveill.ai/compliance-risk-intelligence). Firm-level assessments benchmarked against the full 154-firm dataset are available upon request.

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#### About Surveill

Surveill is an AI-driven compliance platform built on one principle: every firm is unique. The platform unifies fragmented compliance data, codifies regulatory requirements into traceable deterministic logic, and monitors risk continuously across financial institutions and law firms. Surveill's Compliance Risk Intelligence program applies this capability at sector scale, enabling firms to see what regulators look for before they arrive. Built on MIT-powered AI expertise. Trusted by leading financial institutions and law firms.

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