

Conflicts of Interest Policy

Roscap Limited (company number 13536901) ('Roscap', 'we', 'us' or 'our').

Roscap seeks to identify, manage, and where appropriate disclose conflicts of interest to protect clients and counterparties and to maintain professional standards.

What is a conflict?

A conflict of interest may arise where Roscap's interests, or those of our directors, employees, or close associates, could influence or appear to influence the services we provide or the advice we give.

How we manage conflicts

- Maintain a register of actual and potential conflicts.
- Assess conflicts at onboarding and throughout each mandate.
- Use information barriers and restricted access to sensitive information where appropriate.
- Decline or withdraw from mandates where a conflict cannot be appropriately managed.
- Disclose material conflicts to affected parties where relevant and lawful to do so.

Fees, commissions, and referral arrangements

Where Roscap receives fees, commissions, or referral payments, we aim to disclose the nature of those arrangements in the relevant engagement documentation. We do not accept arrangements that would impair our duty to act with integrity or that create unmanaged conflicts.

Gifts and hospitality

We maintain standards on gifts and hospitality to prevent undue influence. Gifts or hospitality must be reasonable, proportionate, and recorded where appropriate. We do not accept anything that could be perceived as intended to influence our judgement.