



## **ASCOT WEALTH MANAGEMENT. FINANCIAL CODE OF ETHICS**

Ascot Wealth Management (the "Firm") has established this Financial Code of Ethics (the "Code") to uphold the highest professional standards and foster a culture of integrity across all business activities. This Code supplements Ascot's Corporate Governance & Compliance Framework and applies to all employees, directors, and affiliated professionals.

This Code of Ethics, including all amendments or waivers, shall be publicly disclosed through our website at [www.ascotwealthmgt.com/documentation](http://www.ascotwealthmgt.com/documentation) and filed with the Financial Conduct Authority as required by FCA Handbook provisions, including COCON 2 and SYSC 4.1 governing conduct standards for UK financial services firms.

### **1. Persons Covered**

This Code of Ethics applies to all Senior Managers and Certified Persons under the UK Senior Managers & Certification Regime (SMCR), including the Chief Executive (SMF1), Chief Finance Officer (SMF2), and individuals holding Senior Management Functions for Compliance Oversight (SMF16) and Financial Reporting (SMF4). It extends to all FCA-regulated staff performing accounting, control, or regulatory reporting activities across Ascot Wealth Management and its UK subsidiaries, in accordance with FCA Handbook SYSC 4.3 provisions for group-wide governance.

### **2. Professional or Personal Conflicts of Interest**

The CEO and Senior Managers under Ascot's UK Senior Managers & Certification Regime (SMCR) must consistently demonstrate the highest ethical standards, prioritizing the firm's interests with impartial judgment as required by FCA Conduct Rules. These leaders bear responsibility for identifying and properly disclosing any actual or potential conflicts of interest to the designated Compliance Officer (SMF16), particularly before engaging in personal investments, accepting external positions, or participating in transactions where personal interests might intersect with professional duties, including activities involving family members. All such disclosures undergo rigorous review in accordance with FCA SYSC 10 conflict management requirements and the UK Bribery Act 2010, with significant matters elevated to the Board's Risk Committee for deliberation. Approval decisions are formally documented following MAR 1.3 personal account dealing rules and COCON 2.1 conduct standards, ensuring full compliance with UK regulatory expectations for conflict governance across all regulated activities.

### **3. Disclosures**

The CEO and Senior Managers under the UK Senior Managers Regime must ensure all FCA and PRA submissions and public communications are full, fair, accurate, timely, and understandable. This obligation covers financial reports under UK GAAP, regulatory filings per FCA rules, MAR market disclosures, and client communications under COBS, all reviewed by Compliance (SMF16) to meet FCA Principle 7 and Companies Act 2006 standards.

### **4. Compliance with Governmental Laws, Rules and Regulations**

The CEO and Senior Managers under the UK Senior Managers Regime must ensure full compliance with all applicable FCA rules, PRA requirements, and UK financial regulations. While not expected to know every regulatory detail, these leaders must proactively seek guidance on legal obligations and immediately report any suspected breaches to the SMF16 Compliance Officer, the Board's Risk Committee, or through Ascot's whistleblowing channels in accordance with FCA SYSC 18 and the Public Interest Disclosure Act 1998.

## **5. Reporting of Violations of this Code of Ethics**

The CEO and Senior Managers governed by the UK Senior Managers Regime (SMR) are fully accountable for adhering to this Code. Any breaches or suspected breaches must be promptly reported to the Compliance Officer (SMF16) and may result in disciplinary action, including termination, as determined by the Board. Ascot strictly prohibits retaliation against individuals who raise good faith concerns in line with FCA whistleblowing rules (SYSC 18) and the Public Interest Disclosure Act 1998.

## **6. Waivers of this Code of Ethics**

Any waiver of this Code or its provisions requires prior written approval from Ascot's Board or its designated committee. All granted waivers will be publicly disclosed in accordance with FCA transparency rules (SYSC 4.1), the UK Companies Act 2006, and the EU Market Abuse Regulation as applicable to listed entities.

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