ROUND FINANCIAL LIMITED
MIFIDPRU 8 DISCLOSURE
November 2026

1. Introduction

Round Financial Limited ("the Firm") is authorised and regulated by the Financial Conduct Authority ("the FCA") in the UK (FRN 1050315). The Firm is an investment firm under the scope of the Markets in Financial Instruments Directive ("MiFID investment firm") that arranges investments in money market funds for its business clients.
In accordance with the FCA's Investment Firms Prudential Regime ("IFPR"), which governs the prudential requirements for MiFID investment firms, the Firm is classified as a Small and Non-Interconnected Firm ("SNI MIFIDPRU Firm"). Given the Firm does not have additional tier 1 instruments in issue, it is subject only to the requirements set out in Chapter 8.6 of the Prudential sourcebook for MiFID Investment Firms of the FCA Handbook ("MIFIDPRU 8.6"), in line with MIFIDPRU 8.1.1R(3). MIFIDPRU 8.6 requires firms to disclose information regarding their remuneration arrangements.

This disclosure has been prepared by the Firm in line with the requirements of MIFIDPRU 8.6, on an individual basis, and has been approved by the Board. It covers the Firm's financial year ending 30th November 2025. Unless otherwise stated, all figures shown are as at the Firm's most recent financial year-end on 30th November 2025.

2. Governance and Oversight

Given the Firm's nature, scale and complexity, it has not implemented a Remuneration Committee. The Board has ultimate responsibility for ensuring that remuneration policies and practices are consistent with, and promote, sound and effective risk management, and are in line with the business strategy, objectives and long-term interests of the Firm and its clients, in particular:

- its risk appetite and strategy, including environmental, social and governance risk factors;
- its culture and values; and
- the delivery of good outcomes for its clients.

The Chief Executive Officer and/or Chief Technical Officer propose and set remuneration for employees under their remit. No individual is involved in decisions about their own remuneration. The Head of Compliance reviews the Remuneration Policy annually to confirm it remains consistent with regulatory requirements and with the Firm's risk management framework.

3. Remuneration Policy

As an SNI MIFIDPRU Firm, the Firm has a regulatory obligation to comply with the MIFIDPRU Remuneration Code as set out in Chapter 19G of the Senior Management Arrangements, Systems and Controls sourcebook ("SYSC 19G") of the FCA Handbook.

The Firm has implemented a Remuneration Policy which is appropriate and proportionate to the nature, scale and complexity of the risks inherent in its business model and activities. The

Remuneration Policy, which sets out the fixed and variable remuneration practices for all staff, ensures that it:

- is gender neutral and complies with the Equality Act 2010;
- contains measures to avoid conflicts of interest;
- encourages responsible business conduct and good outcomes for clients under the Consumer Duty; and
- promotes risk awareness and prudent risk taking.

The Firm's Remuneration Policy is reviewed and approved by the Board on an annual basis, and whenever there is a material change to the Firm's business or staff.

4. Remuneration Framework

The Firm's remuneration is made up of fixed and variable components.

Fixed remuneration consists of base salary and employer pension contributions, and is in line with prevailing market levels for each role. Fixed remuneration is set at a level that allows the Firm to operate a fully flexible variable remuneration policy, including paying no variable remuneration.

Variable remuneration consists of commission for relevant individuals and/or share options under the Round Financial Limited Employee Share Option Scheme. Variable remuneration takes into consideration the Firm's overall financial performance and capital position.

It is the Firm's policy to ensure that remuneration takes into consideration both quantitative criteria, such as new client business generated, and qualitative criteria, such as behavioural measures, client complaints, adherence to the relevant regulations and compliance with the Consumer Duty outcomes. Variable remuneration can be reduced to zero where an individual's conduct or performance falls short, or where the Firm's financial position does not support an award.

Staff in control functions, including compliance, are remunerated according to the objectives of their own function and independently of the performance of the business areas they oversee.

5. Remuneration for the year ended 30 November 2025

For the financial year ended 30 November 2025, the total amount of remuneration awarded to all staff was £259,546.48, of which the fixed remuneration and variable remuneration were £259,546.48 and £0 respectively.