IGUAKO CAPITAL · Group policy

Regulatory Reporting and Engagement

This policy governs every filing, notification and disclosure that a group entity makes to a supervisory authority, and every contact between the firm and its supervisors. It fixes who may speak to a supervisor, how a filing is prepared and checked, how deadlines are tracked across 28 jurisdictions, and how a breach or a late filing is escalated. It binds each licensed entity, its local compliance officer and every function that supplies data to a regulatory return.

CODE	CATEGORY	VERSION
IGC-GR-005	Governance and risk	3.4
EFFECTIVE	**REVIEW**	**OWNER**
2022-10-01	Annual. Last reviewed June 2026. Next review due June 2027.	General Counsel and Group Head of Compliance

1. Purpose and scope

Twenty-eight jurisdictions of domicile or registration means twenty-eight supervisory relationships, each with its own calendar, forms and expectations. The policy exists so that the firm meets all of them from one system, speaks to all of them with one voice and never learns of a missed deadline from the supervisor. It treats accuracy and timeliness as the same obligation.

The policy covers periodic returns on capital, liquidity, client money and client assets; transaction and position reports; notifications of changes in control, in directors and in senior staff; licence applications and variations; responses to information requests; and reports of breaches, incidents and suspicions. It covers written and oral contact alike, including supervisory visits, thematic reviews and informal enquiries.

Reports made to a financial intelligence unit under the Anti-Money Laundering and Counter-Terrorist Financing policy follow that policy's reporting line and are not governed here, except that the fact and the date of such a report are logged in the regulatory register. Tax information exchange filings are governed by the Prevention of the Facilitation of Tax Evasion policy and the local tax procedures.

2. Roles and the single voice

Each licensed entity has a local compliance officer who is the named contact for its supervisor. That officer owns the entity's regulatory calendar, signs or countersigns its filings and attends supervisory meetings. The Group Regulatory Relations function in London supports the local officers, holds the group register and coordinates any matter that touches more than one entity.

No other person contacts a supervisor on the firm's behalf without the local compliance officer present or informed in advance. Directors and executives who receive a direct approach refer it to the local officer the same day. Where a supervisor asks to speak to a business head, the meeting takes place with the local officer in attendance and a note is taken and filed.

The General Counsel and Group Head of Compliance is accountable for the policy and is the escalation point for any disagreement with a supervisor. Where a group entity considers challenging a supervisory decision, the decision to do so is taken by the Compliance & Conduct Committee and reported to the Board. The firm's default position is cooperation.

3. The regulatory calendar and register

The group regulatory register lists every recurring obligation of every licensed entity: the return, the supervisor, the frequency, the due date, the data owner, the preparer, the reviewer and the signatory. As at 30 June 2026 the register holds 214 recurring obligations across the 28 jurisdictions, from monthly client-money reconciliations to annual audited returns.

Each obligation is tracked in the group compliance system with automatic reminders at 20, 10 and 3 working days before the due date. Data owners in Finance, Risk, Operations and the divisions supply the underlying figures to a fixed timetable. A filing that has not been submitted two working days before its due date is escalated to the General Counsel and Group Head of Compliance.

Event-driven obligations, such as the notification of a new director or a change of control, are added to the register when the triggering event is first planned, not when it happens. The Expansion Committee is required to notify Group Regulatory Relations of every planned office opening, licence application or entity change under Programme Latitude at least six months in advance.

4. Preparation, review and sign-off

A regulatory filing is prepared by one person and reviewed by a second who did not prepare it. The reviewer checks the figures to source, the completeness of the form and the consistency of the filing with the last one submitted and with the firm's books. Any difference from the prior period above 10 per cent is explained in the working papers before sign-off.

Sign-off is by the local compliance officer or, for returns on capital, liquidity or audited accounts, by a director of the entity. The signatory attests that the filing is accurate and complete to the best of their knowledge, and the attestation is filed with the working papers. Working papers are retained for the period the Records Management and Retention policy sets, which is never less than six years.

Narrative submissions, including responses to information requests and licence applications, are drafted by the local officer and reviewed by Group Regulatory Relations and, where the matter is material, by the General Counsel and Group Head of Compliance. A submission never states a fact that the firm cannot evidence from its own records.

5. Breaches, errors and late filings

A breach of a regulatory requirement, an error in a filing or a late filing is reported to the local compliance officer the day it is discovered and to Group Regulatory Relations within one working day. The local officer decides, with the General Counsel and Group Head of Compliance where the matter is material, whether and when the supervisor is told. The presumption is disclosure, promptly and in full.

Every breach, error and late filing is recorded in the group breach register with its cause, its remediation and the date the supervisor was informed. The register is reviewed by the Compliance & Conduct Committee each quarter. In the year to 30 June 2026 the register recorded four late filings and two corrected returns across 214 recurring obligations, none of which resulted in supervisory action.

A pattern of breaches in one entity or one data source is treated as a control failure and referred to Internal Audit. The root cause is traced to the data owner, the preparer or the system, and the fix is tested before the next filing cycle. Material breaches are reported to the Board through the Audit Committee.

6. Supervisory engagement and visits

The firm keeps a written record of every supervisory contact: meetings, calls, letters, information requests and visits. The record is held in the group compliance system and is available to the Board. Supervisory correspondence is answered within the time the supervisor sets or, where none is set, within ten working days.

Supervisory visits are prepared for by the local compliance officer with Group Regulatory Relations. Staff who will meet the supervisor are briefed on the scope of the visit and on the obligation to answer accurately. Nobody is coached on what to say. Documents provided to a supervisor are logged, and a copy of everything provided is retained.

Findings from a supervisory visit are entered in the group action tracker with an owner and a date, and their closure is verified by Compliance before the supervisor is told they are closed. The Compliance & Conduct Committee receives a quarterly dashboard of open supervisory findings, recurring obligations met and missed, and forthcoming regulatory change in each of the 28 jurisdictions.

Key controls

- A group regulatory register of 214 recurring obligations with a named preparer, reviewer and signatory for each.
- Automated reminders at 20, 10 and 3 working days before every due date, with escalation at two days.
- Two-person preparation and review of every filing, with variances above 10 per cent explained.
- A signed accuracy attestation on every return, filed with the working papers.
- A single named contact for each supervisor; no unaccompanied supervisory contact by other staff.
- A breach register reviewed quarterly by the Compliance & Conduct Committee.
- Six-month advance notice from the Expansion Committee of every planned licence or entity change.
- A logged record of every supervisory contact and every document provided.

Related policies

- Anti-Money Laundering and Counter-Terrorist Financing (IGC-FC-001)
- Records Management and Retention (IGC-DT-003)
- Cross-Border Services and Perimeter (IGC-CC-008)
- Prevention of the Facilitation of Tax Evasion (IGC-FC-006)