

Regulatory, Governance and Market Oversight Summary

Subject: Keystone Law Limited (AIM Listed) – Judicial Findings, SRA Oversight, and Market Governance Considerations

1. Judicial Findings Context

- In *Bernhards v Astrosoccer 4 U Ltd*, the Court made serious observations in litigation, including reference to 'connivance'.
- Lord Justice Coulson has previously examined conduct involving the same directors in related proceedings.
- Judicial findings at High Court or appellate level engage core professional integrity principles.
- Public confidence requires clarity regarding regulatory assessment of such findings.

2. SRA Regulatory Transparency Questions

- Whether a formal investigation was opened following judicial findings.
- At what stage any investigation concluded.
- The regulatory reasoning applied under the Enforcement Strategy.
- Why no published outcome appears on the SRA register (if applicable).
- Whether reassessment occurred following continued related disputes.

3. Continued Engagement and Risk Escalation

- Keystone Law's continued engagement in matters involving previously criticised directors.
- Ongoing disputes alleging substantial commercial damages.
- Reputational dimension involving a high-profile public figure (Mr Ian Rush MBE).
- Potential cumulative governance and supervision concerns.
- Assessment of enhanced compliance and risk control procedures.

4. Publicly Listed Status – Market Considerations

- Keystone Law is an AIM-listed entity subject to AIM Rules and Market Abuse Regulation.
- Potential material litigation exposure may engage disclosure considerations (AIM Rule 11).
- Board-level governance and risk register oversight obligations.
- Nomad responsibilities in assessing price-sensitive information.
- Investor confidence implications where judicial criticism and alleged exposure intersect.

5. Oversight Bodies Potentially Engaged

- Solicitors Regulation Authority (SRA) – Professional conduct and integrity oversight.
- Legal Services Board (LSB) – Statutory oversight of SRA under Legal Services Act 2007.
- Financial Conduct Authority (FCA) – Market integrity and disclosure supervision.
- AIM Regulation (London Stock Exchange) – AIM Rule compliance supervision.
- Audit Committee and Non-Executive Directors – Corporate governance oversight.

Prepared for regulatory and governance review purposes. This document summarises key issues raised for consideration and does not assert findings of liability.