



## **AMT FUTURES LIMITED (THE COMPANY) SUMMARY OF CONFLICTS OF INTEREST POLICY**

### **Background**

We have set a policy on the management of conflicts of interest with the objective of taking all appropriate steps to identify and to prevent or manage conflicts as they arise, which might result in a risk to the interests of our clients. We proactively identify service aspects that could potentially lead to conflicts between your interests and ours, or among different clients. We have also considered the FCA's Consumer Duty which requires us to deliver good outcomes for our retail customers.

This document is a summary of those types of conflicts and the way we manage them. In all cases, we believe that our current organisational arrangements, systems and controls provide an effective way of preventing your interests being unfairly affected.

### **Dealing**

We have procedures in place by which aggregated client orders are managed and promptly allocated to individual client accounts. In addition, all client orders are dealt with in a timely manner and in fair and due turn. No unfair priority is given to orders from other clients.

As matched principal broker, we do not trade on our own account and therefore there is no conflict of interest between us and our clients in respect to dealing.

### **Investment research**

Our position as a matched principal broker means we do not engage in proprietary trading, removing any conflict of interest in the investment research we publish. Our strict policy against 'soft dollar' arrangements further ensures the impartiality of our research.

### **Confidentiality and protection of inside information**

We have stringent internal rules to prevent the misuse of sensitive information by our staff, thereby safeguarding against unethical trading activities. In instances where possession of information might lead to a conflict of interest, we take decisive steps to manage such conflicts in accordance with FCA guidelines.

### **Organisational arrangements**

The organisational structure we have implemented provides for the segregation of duties and prevents conflict arising from inappropriately apportioned roles and responsibilities by ensuring that no one individual can exercise inappropriate influence over a particular process.

### **Personal conflicts**

Employment contracts and remuneration policies are carefully structured to avoid any conflicts arising from external business activities or improperly set targets that might conflict with the company's interests.

All employees strictly avoid any personal account dealings that might conflict, or appear to conflict, with the interests of our clients or the integrity of the markets. We inform our clients that some employees may hold positions in the products we offer, which are closely monitored to prevent conflicts of interest.

Our employees do not engage in securities or derivatives dealings or place bets that could conflict with client interests. This includes situations where:

- The firm has open client orders in the same underlying asset.
- Advice is being given to trade the same underlying asset.
- Trade insights on that asset have been published within the last 24 hours.

Employees obtain written approval from the Desk before trading and report all transactions to the Compliance Department immediately. This report should include details of the trade, such as the date, time, financial instrument traded, and the volume of the transaction.

The Compliance Department maintains accurate records of all employee trading activities. This includes not only the trades themselves but also the pre-approval requests. By keeping thorough records, the Compliance Department ensures ongoing oversight and auditability of trading activities, which helps in monitoring compliance with both internal policies and external regulatory requirements.

### **Selection of suppliers**

Our approach to selecting suppliers is guided by the principle of avoiding conflicts of interest. We do not accept or provide fees, commissions, or non-monetary benefits unless they directly enhance the services we offer to our clients.

### **Commission and income disclosure**

We earn income from:

- Commissions and other charges we charge to you
- Interest we earn on moneys held in the course of dealing
- Foreign exchange income

The charges that we make are detailed in our Terms of Business Letter with yourselves.

There is a potential conflict of interest when any broker or independent financial advisor provides investment or trading advice or in any way encourages a client to trade and receives remuneration, in whole or in part, by way of commission on such trades.

- Where you receive advice from us, we address this conflict by assessing your suitability to receive such advice which we base on your financial circumstances and risk tolerance. We document all personal recommendations.
- Where you receive advice from a third party broker or advisor, you should be aware of the potential for a conflict of interest to arise and satisfy yourselves that the advice and third party commissions are appropriate in relation to your situation.

## **Gifts and inducements**

We acknowledge that gifts and entertainment arrangements, common in the futures broking industry, may give rise to adverse influence. We address this by limiting the provision and receipt of gifts/entertainment from customers and introducing brokers to that of a non-material nature.

We do not receive any remuneration for routing client orders to a particular execution venue.

In relation to suppliers of clearing, settlement, custody and associated services, we are careful not to accept any unreasonable gift, inducement or personal entertaining that could reasonably compromise our staff members' ability to select each supplier.

## **Summary**

This document provides an overview of our detailed Conflicts of Interest Policy, which is designed to ensure our clients' fair treatment through effective conflict management. We are confident that our policies and procedures, as outlined, adequately manage any potential conflicts of interest. For a more comprehensive understanding of our policy, further details can be provided upon request.

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