



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

Background

We have established, implemented and maintain a policy on the management of conflicts of interest with the objective of taking appropriate steps to identify, prevent or manage conflicts as they arise, where such conflicts may result in a risk of harm to the interests of our clients. We proactively identify aspects of our relationship with clients that could potentially lead to conflicts between our interests and theirs, or between different clients. Our policy also supports compliance with the FCA's Consumer Duty, including the requirement to act to deliver good outcomes for retail customers.

This document summarises the types of conflict referenced above and how we manage them. We believe that our current organisational arrangements, systems and controls provide an effective way of preventing client 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. We are required to take all sufficient steps to obtain the best possible results for clients when executing orders on their behalf or transmitting orders to third parties for execution.

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 with respect to dealing.

Investment research

We do not employ any research analysts. Notwithstanding, we have safeguards in place to ensure that the activities of any person within the firm relating to the research or analysis of the price or market for any commodity or derivative are separated by appropriate informational partitions within the firm from the review, pressure, or oversight of persons whose involvement in clearing activities might potentially bias the judgement or supervision of the persons.

Confidentiality and protection of inside information

We have adopted internal rules to prevent the misuse of sensitive information by our staff, which provide appropriate mitigation against the risk of our staff being involved in unethical trading activities. In instances where possession of information might lead to a conflict of interest (either between us and one or more of our clients, or between clients), such conflicts are managed 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.

AMTF maintains a Conflicts of Interest Register that records identified actual and potential conflicts together with mitigating controls and ownership.

Personal conflicts

Our 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.

Our employees are aware of the potential for conflicts of interest to arise as a consequence of personal account dealings; the policies and procedures that we have in place to manage that risk; and that a failure to comply with our policies and processes in relation to personal account dealing may have serious reputational and regulatory consequences for us and for them personally.

The policies and procedures referenced above include the following:

- **Client Transparency:** It is important that our clients are aware of the potential for conflicts to arise between their interests and those of our employees. Our clients are informed that our employees may hold positions in products we offer, and that such positions may result in conflicts between the interests of our employees and their own. We also explain to clients how these conflicts and potential conflicts are monitored and managed, including through this Summary.
- **Employee prohibitions:** Under our policies and procedures, our employees are forbidden from engaging in securities or derivatives dealings, or placing bets, that they know, or could reasonably be expected to know, conflict with the interests of our clients. Specifically, our employees may not undertake activities of the types listed above where:
 - We have open client orders in relation to an underlying asset which would also be the subject of their proposed activity.
 - We are advising, or have recently advised, any client to trade in an underlying asset which would also be the subject of their proposed activity.
 - We have published any research or other market commentary regarding an asset which would also be the subject of their proposed activity within the 24 hours preceding the proposed timing of their activity.
- **Consent and reporting:** Employees must obtain approval from the Execution Desk before entering into any transaction where a potential conflict has been identified and report all transactions to our Compliance Department promptly following execution. Trading reports are required to include all relevant details of the trade, including the date and time of execution, financial instrument(s) traded, and the volume of the transaction.

AMTF is a member of the AMC Group, a global corporate group active in the recycling, trading, and upgrading of metals used in the electrification of the planet. Certain employees of AMTF may also undertake activities for affiliated AMC Group entities where appropriately authorised and certified. Any resulting conflicts are managed through contractual arrangements, compliance oversight and internal controls adopted by the members of the AMC Group concerned.

Selection of suppliers

The avoidance of conflicts of interest is a key factor in our approach to selecting suppliers. This includes the selection of clearing brokers, discretionary asset managers, and other third-party service providers. 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 our clients.

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. AMTF's remuneration arrangements are designed to avoid creating incentives that could conflict with the interests of clients. In this regard:

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

We do not accept or provide fees, commissions or non-monetary benefits unless they are designed to enhance the quality of service provided to clients and do not impair our duty to act honestly, fairly and professionally in accordance with the best interests of our clients.

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.

May 2026