



## 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.

Our approach has been to identify those aspects of our service which could result in a conflict between your and our interests, or between the interests of different clients. We have also considered the Financial Services Authority'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**

As a 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 of any investment research we may publish. We do not engage in 'soft dollar' arrangements.

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

Our internal dealing rules are designed to prevent staff in possession of price sensitive information from dealing in the respective security, commodity or derivative, or arranging someone else to do so on their behalf.

If we were to acquire information that gave rise to a conflict of interest, we would take steps to manage that conflict.

### **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**

Contracts of employment are designed to prevent staff performing an outside business activity which may conflict with the interests of the Company. Remuneration arrangements are carefully considered to ensure that conflicts do not inadvertently arise through inappropriately set targets, or which could provide an incentive to a staff member to recommend a particular product or service when an alternative would better meet a client's needs.

## **Selection of suppliers**

We attempt to prevent conflicts arising regarding the selection of suppliers by refusing to accept or provide fees, commissions and non-monetary benefits which do not directly enhance the service offered.

## **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, independent financial advisor or discretionary asset manager provides investment or trading advice or in any way encourages a client to trade and also receives remuneration, in whole or in part, by way of commission on such trades.

- Where you receive advice from ourselves, 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, advisor or discretionary asset manager, 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**

The above summary reflects our detailed Conflicts of Interest Policy that is in place to ensure fair treatment of our clients through the effective management of potential conflicts. We do not have any conflicts of interest which are not appropriately managed. Further details of the Company's Conflicts of Interest Policy can be provided on request.

June 2023