

**AMP Global Clearing, LLC
FCM Risk Disclosure
February 26, 2026**

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Introduction

The Commodity Futures Trading Commission (“Commission”) requires each futures commission merchant (FCM), including AMP Global Clearing, LLC (“AMP”), to provide the following information to a customer prior to the time the customer first enters into an account agreement with the FCM or deposits money or securities (“funds”) with the FCM. Except as otherwise noted below, the information set out is as of January 31, 2026. AMP will update this information annually and as necessary to take account of any material changes to its business operations, financial condition, or other factors that AMP believes may be material to a customer’s decision to do business with AMP. Nonetheless, AMP’s business activities and financial data are not static and will change in non-material ways frequently in any 12-month period.

AMP and Its Principals

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compliance@ampclearing.com

This remains the business address of all principals.

As of September 02, 2025, the Chicago Mercantile Exchange (CME) is AMP’s Designated Self-Regulatory Organization (“DSRO”).

The CME’s website may be accessed here: <https://www.cmegroup.com/>

The following individuals are registered principals of AMP:

Daniel Culp

President of AMP and is also its sole Member. Mr. Culp has over 20 years of experience as a registrant in the futures industry. Mr. Culp has been a listed principal of AMP since July 2009 and has been registered as an AP since June 2010. Mr. Culp is the President of AMP and is also the sole Member. Mr. Culp’s duties include general oversight and supervision of the non-clearing operations of AMP. In this capacity, Mr. Culp is responsible for overseeing daily customer trading and banking activity, as well as maintaining AMP’s existing IB relationships. Additionally, Mr. Culp supervises AMP’s regulatory and internal compliance by reviewing emails related to AMP’s operations. Mr. Culp began his career at Core Trading, LLC, formerly an introducing broker and broker-dealer, where he briefly held an AP Temporary license between August 2002 and November 2002. After leaving Core Trading, LLC, Mr. Culp was a registered AP at Cannon Trading Company, Inc., an introducing broker, and recently registered forex firm, from February 2003 to December 2005. From December 2005 through April 2008, Mr. Culp was listed as a principal of AMP Futures, LLC, formerly an introducing broker established and owned by Mr. Culp. From March 2006 to November 19, 2007, and from November 20, 2007 to April 2008, Mr. Culp was a registered AP of AMP Futures, LLC. From December 2008 to May 2009, Mr. Culp was a listed principal of AMP Global, LLC, formerly a pending futures commission merchant. Mr. Culp was also a listed principal of AMP Trading November 2007 to March 2012, and was a registered AP from February

2008 to March 2009, and since September 2010 to March 2012. Mr. Culp graduated from Pepperdine University in 2002 with a Bachelor of Science degree in economics and political science. Mr. Culp shall be deemed to be the “Governing Body” of the Firm.

Joseph LaPorte

Serves as Trade Desk Manager and Risk Manager of AMP. Joseph has performed varying “risk focused” roles in the futures industry for 30 years.

Shabeer Alam

Serves as Chief Compliance Officer of AMP. He has worked in varying Compliance, and legal roles in the futures industry for over 17 years. His primary duties and responsibilities involve maintaining the firm’s compliance with all regulatory and internal requirements, including AML procedures. Mr. Alam began his career at MF Global Inc., a former FCM, as a Compliance Officer in February 2007, while still in law school. Mr. Alam continued there after his graduation from law school, until November 2011. He has a Juris Doctor from The Chicago-Kent School of Law and is admitted to the Illinois bar.

Michael Rathberger

Serves as AMP’s Chief Operating Officer. Michael Rathberger is a 30-year veteran of Derivatives Clearing and Operations and a graduate of DePaul University. Starting his career as a Payout Specialist with Heindl Commodities in 1982, Mr. Rathberger has held management positions with First Continental Trading Inc., GL Trade and SunGard. Mr. Rathberger joined AMP in July 2011.

His primary duties and responsibilities involve back-office operations and systems, workflow, cash flows, treasury operations, operational risk management. His focus is bringing automation and business process to each position, while understanding the unique risks associated with derivatives clearing.

Brian Zajac

Serves as Second Trade Desk/Risk Manager of AMP. Brian has performed varying “risk focused” roles in the futures industry for over 25 years.

Daniel Martin

Serves as Customer Service Manager of AMP. Daniel has over 20 years of experience in the futures industry and has previously worked as a support manager, at the trade desk, and in operations. Mr. Martin’s duties include managing and supervising the help desk personnel.

AMP’s Business

AMP is registered with the CFTC and NFA as a Futures Commission Merchant and as a Forex Firm.

AMP does not open new accounts coming through any Introducing Brokers although previous relationships established through three IBs and twelve FIBs continue to be serviced as usual.

100% of AMP’s assets and capital are currently dedicated to its business as an FCM. Currently, AMP does not participate in any other business activities or product lines.

FCM Customer Business

AMP's customers fall into the following categories: self-directed retail customers.

AMP customers' trade on the following Exchanges: CME Group Exchanges, ICE US and UK, EUREX, CFE, LIFFE, Sydney (SFE), Singapore (SGX), Hong Kong (HKEX) and Osaka Securities Exchange (OSE).

AMP clears customer transactions at CME Clearing as a direct clearing member for products listed on exchanges within CME Group. For customer transactions executed on other exchanges where the Firm is not a clearing member, the Firm utilizes disclosed carrying brokers to clear such trades. Accordingly, CME is the clearinghouse utilized by AMP, in addition to the carrying broker relationships mentioned below:

GH Financials LLC, Advantage Futures, and Dorman Trading, LLC

AMP Affiliate

AMP had one affiliate in the European Union, AMP Global Ltd., which was voluntarily dissolved at the end of the year, 2023. It had been affiliated to AMP by means of common ownership under US law. AMP Global Ltd. was an EU regulated Firm, registered and licensed to do business in all 30 EEA countries under MiFID, ESMA and MIFIR. AMP Global LTD was authorized and regulated by Cyprus Securities and Exchange Commission (CySEC).

Permitted Depositories and Counterparties

Pursuant to CFTC Reg 1.11(e)(3)(i)(A) the Firm evaluates banks holding Segregated Funds based on the following criteria:

- Capitalization:
- Creditworthiness:
- Operational reliability:
- Access to liquidity:
- Availability of deposit insurance: Regulatory supervision of the depository:

The Firm selects banks that present a very low likelihood of default. The Firm bases new and on-going bank relationship based on: Money, Mechanics, and Management.

- Money: The Firm will only utilize large, national, or international banks that are also approved settlement banks at a CFTC registered Derivative Clearing Organization and foreign banks owned by U.S. bank holding companies, that are also affiliates of approved settlement banks at a CFTC registered Derivative Clearing Organization.
- Mechanics: The bank must have operational capabilities sufficient for the Firm to efficiently and compliantly operate its FCM.
- Management: The Firm must have a direct and open relationship with senior account managers, and acceptable experience with the level of services provided and the customer service.

Pursuant to CFTC Reg 1.11(e)(3)(i)(F) the Firm assesses the appropriateness of specific investments of Segregated Funds in permitted investments in accordance with CFTC Reg 1.25. The Firm takes into consideration the market, credit, counterparty, operational, and liquidity risks associated with such investments, and assess whether such investments are consistent with the objectives of preserving principal and maintaining liquidity.

Acceptance Criteria have been established for the Firm's Investment of Segregated Funds. The criteria are designed to provide a baseline at which the Firm would be comfortable accepting and using the collateral to margin Customers' trading activities.

Risk Tolerance Limits are established to determine the size of investment of Customer Segregated Funds the Firm is willing to accept based on liquidity needs and marketability of the financial instruments.

The Firm's investment criteria for Segregated Funds require that each investment must be readily marketable and highly liquid. The Firm's Risk Tolerance Limit for investments of Segregated Funds is very low. AMP currently holds 100% of its customer Segregated Funds in cash or cash equivalents, and in Treasury Bills or Notes with maturities of 10 years or less, which are among the permitted investments under CFTC Regulation 1.25

Material Risks

AMP is a privately held LLC and as such is not formally rated by any credit rating agency. In order to assure that it is in compliance with its regulatory capital requirements and that it has sufficient liquidity to meet its ongoing business obligations, AMP currently holds a 100% of its assets in cash or cash equivalents and permitted investments as described below.

Nature of investments made by the FCM: investments of customer funds comply with CFTC Regulation 1.25. As permitted under CFTC rules, client funds are invested in short-term obligations of the U.S. Department of the Treasury in the form of U.S. Treasury Bills ("T-Bills") with original maturities of 366 days or less to ensure compliance with regulatory capital requirements and sufficient liquidity to meet ongoing business obligations, AMP Global does not engage in proprietary trading.

The portfolio is invested exclusively in short-term obligations of the U.S. Department of the Treasury in the form of U.S. Treasury Bills ("T-Bills") with original maturities of 366 days or less. T-Bills are direct obligations of the United States Government and are backed by its full faith and credit. These securities are highly liquid and are typically issued at a discount to par value. Because the investments are limited to short-term Treasury Bills, the portfolio is designed to prioritize capital preservation, liquidity, and minimal credit risk over yield enhancement.

Credit Quality

U.S. Treasury Bills are considered to be of the highest credit quality, as they are backed by the full faith and credit of the U.S. Government. As such, they are generally regarded as having negligible credit risk and are commonly used as a benchmark for risk-free rates in U.S. dollar-denominated markets.

Weighted Average Maturity (WAM)

Given that all holdings have maturities of 366 days or less, the portfolio maintains a short weighted average maturity (WAM). A shorter WAM reduces exposure to interest rate risk and price volatility. The specific WAM at any reporting date will depend on the maturity distribution of the T-Bills held but will not exceed one year.

No Coupon / Discount Instruments

Treasury Bills are zero-coupon securities. They do not pay periodic interest; instead, they are issued at a discount to their face value and mature at par. The difference between the purchase price and the maturity value represents the investor's return. As a result, there are no interim cash flows from coupon payments, and income is recognized through the accretion of the discount over the holding period.

FCM's creditworthiness: AMP is a privately held LLC and has not applied for any extended credit. As such, it is not formally rated by any credit rating agency. The Company's principal liabilities consist of customer funds on deposit. AMP incurs minimal credit risk exposure to institutions. This risk may arise from a variety of business activities, including, but not limited to, entering contracts under which counterparties have obligations to make payments to AMP. Managing credit risk requires credit analysis of clients, both initially and on an ongoing basis. Although minimal, AMP may incur credit risk from investments whose value may fluctuate based on realized or expected defaults on the underlying obligations or loans.

FCM's leverage: The Company's balance sheet leverage is calculated and report monthly to the CME. As of January 31, 2026, AMP's balance sheet leverage was 1.12

FCM's capital: As an FCM, the Company is subject to the net capital requirements under Commission Regulation 1.17. Under these provisions, the Company is required to maintain minimum net capital, as defined, of the higher of \$1,000,000, or the sum of 8 percent of customer and 8 percent on non-customer risk maintenance margin requirements on all positions. Adjusted net capital and risk maintenance margin requirements change from day to day. As of January 31, 2026, AMP had net capital requirement of \$1,000,000 and adjusted net capital of 18,395,141 which is \$ 17,395,141 in excess of its regulatory capital requirement. Hence, the Company was in compliance with these capital requirements. The net capital requirements could effectively restrict the payment of cash distributions, the making of unsecured loans to its owners or affiliates and the purchase by the firm of its own membership interests.

FCM's liquidity: AMP currently holds a 100% of its assets in cash or permitted investments of US Treasury bonds to ensure liquidity.

Principal liabilities: The Company's principal liabilities consist of customer funds on deposit

Balance Sheet leverage: The Company's balance sheet leverage is calculated and report monthly to the NFA. As of January 31, 2026, AMP's balance sheet leverage was 1.12

Other lines of business: AMP does not pursue any other line of business, and execution of customers' futures contracts is its sole business pursuit.

Risk to the FCM created by its former affiliate's activities including investment of customer funds in an affiliated entity: AMP always had minimal risk exposure due to the affiliate including its customer

activity because AMP had not entered any guaranteed agreement on behalf of its affiliate. Since the voluntary dissolution of the affiliate in 2023, this has reduced even further.

Any significant liabilities, contingent or otherwise material commitments: AMP has no material commitments.

Material Complaints or Actions

In the normal course of business, AMP may be named from time to time as a respondent in legal proceedings arising out of its business as an FCM. AMP may also be involved from time to time in investigations and proceedings by governmental and/or regulatory agencies or self-regulatory organizations, which may result in adverse judgments, fines, or penalties. There were no material legal or regulatory actions against AMP in the years, 2022-2023, 2023-2024 and 2024-2025.

Customer Funds Segregation Overview

Customer Accounts. FCMs may maintain two different types of accounts for customers, depending on the products a customer trades:

- (i) a **Customer Segregated Account** for customers that trade futures and options on futures listed on US futures exchanges;
- (ii) a **30.7 Account** for customers that trade futures and options on futures listed on foreign boards of trade; and

The requirement to maintain these separate accounts reflects the different risks posed by the different products. Cash, securities, and other collateral (collectively, **Customer Funds**) required to be held in one type of account, *e.g.*, the Customer Segregated Account, may not be commingled with funds required to be held in another type of account, *e.g.*, the 30.7 Account, except as the Commission may permit by order. For example, the Commission has issued orders authorizing ICE Clear Europe Limited, which is registered with the Commission as a DCO, and its FCM clearing members: (i) to hold in Cleared Swaps Customer Accounts Customer Funds used to margin both (a) Cleared Swaps and (b) foreign futures and foreign options traded on ICE Futures Europe, and to provide for portfolio margining of such Cleared Swaps and foreign futures and foreign options; and (ii) to hold in Customer Segregated Accounts Customer Funds used to margin both (c) futures and options on futures traded on ICE Futures US and (d) foreign futures and foreign options traded on ICE Futures Europe, and to provide for portfolio margining of such transactions.

Customer Segregated Account. Funds that customers deposit with an FCM, or that are otherwise required to be held for the benefit of customers, to margin futures and options on futures contracts traded on futures exchanges located in the US, *i.e.*, designated contract markets, are held in a **Customer Segregated Account** in accordance with section 4d(a)(2) of the Commodity Exchange Act and Commission Rule 1.20. **Customer Segregated Funds** held in the Customer Segregated Account may not be used to meet the obligations of the FCM or any other person, including another customer.

All Customer Segregated Funds may be commingled in a single account, *i.e.*, a customer omnibus account, and held with: (i) a bank or trust company located in the US; (ii) a bank or trust company located outside of the US that has in excess of \$1 billion of regulatory capital; (iii) an FCM; or (iv) a DCO. Such commingled account must be properly titled to make clear that the funds belong to, and are being held for the benefit of, the FCM's customers. Unless a customer provides instructions to the contrary, an FCM may hold Customer Segregated Funds only: (i) in the US; (ii) in a money center country; or (iii) in the country of origin of the currency.

An FCM must hold sufficient US dollars in the US to meet all US dollar obligations and sufficient funds in each other currency to meet obligations in such currency. Notwithstanding the foregoing, assets denominated in a currency may be held to meet obligations denominated in another currency (other than the US dollar) as follows: (i) US dollars may be held in the US or in money center countries to meet obligations denominated in any other currency; and (ii) funds in money center currencies may be held in the US or in money center countries to meet obligations denominated in currencies other than the US dollar.

30.7 Account. Funds that **30.7 Customers** deposit with an FCM, or that are otherwise required to be held for the benefit of customers, to margin futures and options on futures contracts traded on foreign boards of trade, *i.e.*, **30.7 Customer Funds**, and sometimes referred to as the **foreign futures and foreign options secured amount**, are held in a **30.7 Account** in accordance with Commission Rule 30.7.

Funds required to be held in the 30.7 Account for or on behalf of 30.7 Customers may be commingled in an omnibus account and held with: (i) a bank or trust company located in the US; (ii) a bank or trust company located outside the US that has in excess of \$1 billion in regulatory capital; (iii) an FCM; (iv) a DCO; (v) the clearing organization of any foreign board of trade; (vi) a foreign broker; or (vii) such clearing organization's or foreign broker's designated depositories. Such commingled account must be properly titled to make clear that the funds belong to, and are being held for the benefit of, the FCM's 30.7 Customers. As explained below, Commission Rule 30.7 restricts the amount of such funds that may be held outside of the US.

Customers trading on foreign markets assume additional risks. Laws or regulations will vary depending on the foreign jurisdiction in which the transaction occurs, and funds held in a 30.7 Account outside of the US may not receive the same level of protection as Customer Segregated Funds. If the foreign broker carrying 30.7 Customer positions fails, the broker will be liquidated in accordance with the laws of the jurisdiction in which it is organized, which laws may differ significantly from the US Bankruptcy Code. Return of 30.7 Customer Funds to the US will be delayed and likely will be subject to the costs of administration of the failed foreign broker in accordance with the law of the applicable jurisdiction, as well as possible other intervening foreign brokers, if multiple foreign brokers were used to process the US customers' transactions on foreign markets.

If the foreign broker does not fail but the 30.7 Customers' US FCM fails, the foreign broker may want to assure that appropriate authorization has been obtained before returning the 30.7 Customer Funds to the FCM's trustee, which may delay their return. If both the foreign broker and the US FCM were to fail, potential differences between the trustee for the US FCM and the administrator for the foreign broker, each with independent fiduciary obligations under applicable law, may result in significant delays and additional administrative expenses. Use of other intervening foreign brokers by the US FCM to process the trades of 30.7 Customers on foreign markets may cause additional delays and administrative expenses.

To reduce the potential risk to 30.7 Customer Funds held outside of the US, Commission Rule 30.7 generally provides that an FCM may not deposit or hold 30.7 Customer Funds in permitted accounts outside of the US except as necessary to meet margin requirements, including prefunding margin requirements, established by rule, regulation, or order of the relevant foreign boards of trade or foreign clearing organizations, or to meet margin calls issued by foreign brokers carrying the 30.7 Customers' positions. The rule further provides, however, that, in order to avoid the daily transfer of funds from accounts in the US, an FCM may maintain in accounts located outside of the US an additional amount of up to 20 percent of the total amount of funds necessary to meet margin and prefunding margin requirements to avoid daily transfers of funds.

Investment of Customer Funds. Section 4d(a)(2) of the Act authorizes FCMs to invest Customer Segregated Funds in obligations of the United States, in general obligations of any State or of any political subdivision thereof, and in obligations fully guaranteed as to principal and interest by the United States. Section 4d(f) authorizes FCMs to invest Cleared Swaps Customer Collateral in similar instruments.

Commission Rule 1.25 authorizes FCMs to invest Customer Segregated Funds, Cleared Swaps Customer Collateral and 30.7 Customer Funds in instruments of a similar nature. Commission rules further provide that the FCM may retain all gains earned and is responsible for investment losses incurred in connection with the investment of Customer Funds. However, the FCM and customer may agree that the FCM will pay the customer interest on the funds deposited.

Permitted investments include:

- (i) Obligations of the United States and obligations fully guaranteed as to principal and interest by the United States (U.S. government securities);
- (ii) General obligations of any State or of any political subdivision thereof (municipal securities);
- (iii) Obligations of any United States government corporation or enterprise sponsored by the United States government (U.S. agency obligations);
- (iv) Certificates of deposit issued by a bank (certificates of deposit) as defined in section 3(a)(6) of the Securities Exchange Act of 1934, or a domestic branch of a foreign bank that carries deposits insured by the Federal Deposit Insurance Corporation;
- (v) Commercial paper fully guaranteed as to principal and interest by the United States under the Temporary Liquidity Guarantee Program as administered by the Federal Deposit Insurance Corporation (commercial paper);
- (vi) Corporate notes or bonds fully guaranteed as to principal and interest by the United States under the Temporary Liquidity Guarantee Program as administered by the Federal Deposit Insurance Corporation (corporate notes or bonds); and
- (vii) Interests in money market mutual funds.

The duration of the securities in which an FCM invests Customer Funds cannot exceed, on average, two years.

An FCM may also engage in repurchase and reverse repurchase transactions with non-affiliated registered broker-dealers, provided such transactions are made on a delivery versus payment basis and involve only permitted investments. All funds or securities received in repurchase and reverse repurchase transactions with Customer Funds must be held in the appropriate Customer Account, *i.e.*, Customer Segregated Account or 30.7 Account. Further, in accordance with the provisions of Commission Rule 1.25, all such funds or collateral must be received in the appropriate Customer Account on a delivery versus payment basis in immediately available funds.

No SIPC Protection- It is important to understand that the funds you deposit with AMP for trading futures and options on futures contracts on either US or foreign markets are not protected by the Securities Investor Protection Corporation.

Further, Commission rules require AMP to hold funds deposited to margin futures and options on futures contracts traded on US designated contract markets in Customer Segregated Accounts. Similarly, AMP must hold funds deposited to margin futures and options on futures contracts traded on foreign boards of trade in a 30.7 Account, respectively. In computing its Customer Funds requirements under relevant Commission rules, AMP may only consider those Customer Funds held in the applicable Customer Accounts and may not apply free funds in an account under identical ownership but of a different classification or account type (*e.g.*, securities, Customer Segregated, 30.7) to an account's margin deficiency. In order to be used for margin purposes, the funds must actually transfer to the identically owned under margined account.

For additional information on the protection of customer funds, please see the Futures Industry Association's "Protection of Customer Funds Frequently Asked Questions" located at <https://www.fia.org/sites/default/files/2019-05/Protection-of-Customer-Funds---FAQs.pdf>

Filing a Complaint

A customer that wishes to file a complaint about AMP or one of its employees with the Commission can contact the Division of Enforcement either electronically at <https://forms.cftc.gov/Forms/Complaint/Screen1> or by calling the Division of Enforcement toll-free at 866-FON-CFTC (866-366-2382).

A customer that wishes to file a complaint about AMP or one of its employees with the CME at <https://www.cmegroup.com/market-regulation/file-complaint.html> or by calling CME directly at 312.341.7970.

Relevant Financial Data

Copies of AMP's recent audited financials are available on the AMP website, at <https://www.ampfutures.com/cftc-rule-1-55-reporting>

The following financial data is as of January 31, 2026:

Total Equity/Net Worth	\$ 23,141,041
Adjusted Net Capital	\$ 18,395,141
Excess Net Capital	\$ 13,395,141

As of January 31st, 2026, 821 customers represented 50% of AMP's total segregated funds held on behalf of clients, and 20 customers accounted for 50% of AMP's total secured funds.

AMP has not written off any 30.7 customer receivable balances as uncollectable during the period between February 2025 and January 2026. Receivable balances in the customer segregated funds that were offset against commissions during the 12 month period between February 2025 through January 2026 was approximately 0.07% of the current balance of funds held for futures customers. Amount written off as uncollectable in that period is \$0 because debits were offset by broker commissions.

AMP does not:

- Trade proprietarily, and thus has no proprietary margin requirement;
- Entered any principal over-the-counter transactions;
- Have any committed unsecured lines of credit (or similar short-term funding); or
- Provide financing to customer.

As a privately held company, AMP has never been formally rated by any rating agency. In 2013 the Firm sought and obtained a loan from J.P. Morgan Chase for purposes of purchasing the office space in Chicago, Illinois. The Firm continues to believe that it is creditworthy and has no reason to believe that it would not be able to obtain additional credit in the event it chose to seek it.

Additional financial information on all FCMs is also available on the Commission's website at:

<http://www.cftc.gov/MarketReports/financialfcmdata/index.htm>

Customers should be aware that the National Futures Association (**NFA**) publishes on its website certain financial information with respect to each FCM. The FCM Capital Report provides each FCM's most recent month-end adjusted net capital, required net capital, and excess net capital. (Information for a twelve-month period is available.) In addition, NFA publishes twice monthly a Customer Segregated Funds report, which shows for each FCM: (i) total funds held in Customer Segregated Accounts; (ii) total funds required to be held in Customer Segregated Accounts; and (iii) excess segregated funds, *i.e.*, the FCM's Residual Interest. This report also shows the percentage of Customer Segregated Funds that are held in cash or cash equivalents, and each of the permitted investments under Commission Rule 1.25. Finally, the report indicates whether the FCM held any Customer Segregated Funds during that month at a depository that is an affiliate of the FCM.

The report shows the most recent semi-monthly information, but the public will also have the ability to see information for the most recent twelve-month period. A 30.7 Customer Funds report provides the same information with respect to the 30.7 Account.

The above financial information reports can be found by conducting a search for a specific FCM in NFA's BASIC system (<http://www.nfa.futures.org/basicnet/>) and then clicking on "View Financial Information" on the FCM's BASIC Details page.

Summary of AMP's Risk Practices and Controls

Purpose and Scope

This Risk Management Plan establishes the framework for identifying, assessing, monitoring, and mitigating risks across the organization. Its purpose is to ensure operational resilience, regulatory compliance, financial integrity, and the protection of customer and firm assets. The plan applies to all departments, personnel, systems, and business activities.

Governance and Oversight

Risk management oversight is led by senior management, with clearly defined roles and responsibilities across operational, compliance, finance, and technology functions. Management is responsible for:

Establishing risk tolerance levels

Approving risk mitigation strategies

Reviewing periodic risk reports

Ensuring adequate internal controls

Regular reporting ensures transparency and accountability.

Risk Identification

Risks are identified through ongoing monitoring, internal reviews, audits, regulatory developments, and business changes. Key categories include:

Operational Risk (process failures, human error, systems breakdowns)

Regulatory & Compliance Risk (violations of CFTC, NFA, or other applicable rules)

Financial Risk (liquidity, credit exposure, concentration risk)

Technology & Cybersecurity Risk

Reputational Risk

New risks are evaluated as part of product launches, vendor onboarding, or material business changes.

Risk Assessment

Identified risks are assessed based on:

Likelihood of occurrence

Potential impact (financial, operational, legal, reputational)

Control effectiveness

Risks are prioritized using a structured assessment process, allowing management to allocate resources appropriately.

Risk Mitigation and Controls

The firm employs preventative and detective controls to reduce exposure, including:

Segregation of duties

Approval and authorization procedures

Reconciliations and supervisory reviews

Vendor due diligence

Business continuity and disaster recovery planning

Cybersecurity safeguards

Where risks exceed acceptable tolerance levels, corrective action plans are implemented and tracked to resolution.

Monitoring and Reporting

Risk exposure is continuously monitored through:

Exception reporting

Periodic internal reviews

Compliance testing

Financial reconciliations

IT security monitoring

Material issues are escalated promptly to senior management. Risk reporting occurs on a regular basis to ensure informed decision-making.

Business Continuity

The plan incorporates business continuity and disaster recovery measures to ensure critical functions can continue in the event of disruptions. Periodic testing validates preparedness and identifies improvement opportunities.

Continuous Improvement

The Risk Management Plan is reviewed at least annually and updated as necessary to reflect regulatory changes, business growth, operational developments, and lessons learned from incidents.

This Disclosure Document is effective as of February 26, 2026