

MIFIDPRU

Public Disclosures 2024



ADM Investor Services
International Limited

ADM Investor Services International Limited ('ADMISI')

31 December 2024

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1) Introduction

Background

ADM Investor Services International Limited (ADMISI) has prepared its Public Disclosure Statement as part of the IFPR (Investment Firms Prudential Regime) to fulfil the regulatory disclosure requirements set out by the Financial Conduct Authority (FCA) in the prudential handbook, MIFIDPRU 8.

ADM Investor Services International Limited (ADMISI) is a wholly owned subsidiary of Archer Daniels Midland (UK) Limited in the UK which in turn is a wholly owned subsidiary of Archer Daniels Midland Company (ADM) a public company listed on the New York Stock Exchange. ADM Investor Services International Limited (ADMISI) is regulated on a solo entity basis. The disclosures contained in this document have been approved by ADMISI's Board of Directors.

2) Disclosure Policy

ADM Investor Services International Limited (ADMISI) undertakes activities within the MIFID scope and is classified as a Non- Small Non- interconnected (non-SNI) MIFIDPRU investment firm and subject to the Investment Firms Prudential Regime (IFPR) contained in the FCA MIFIPRU sourcebook for Investment firms.

The Public Disclosures is made available by ADMISI on an annual basis and on a Solo entity basis – proportionate to its size, organisation, nature, scope and complexity of the firm's activities.

ADMISI is regulated by the FCA on a solo-entity basis. The FCA sets the capital and liquidity requirements for the firm.

The disclosures contained in this document is in accordance with requirements outlined in IFPR which requires Investment firms to publicly disclose information on the Firm's Own Funds, Behaviour (Investment Policy) and Culture (Risk Management, Governance and Remuneration). This document aims to provide market transparency and accountability.

These public disclosures are not required to be subject to external audit but instead has been approved by ADMISI's Board of Directors. These disclosures are only subject to external verification to the extent that they contain figures taken from the annual audited financial statements.

ADMISI has omitted certain information which it deems proprietary or confidential. Proprietary/confidential information if disclosed will undermine a competitive position or breach an obligation of confidence between the firm and its customers, suppliers and counterparties.

The annual public disclosure report is available on the company's website at www.admisi.com

Copies of the statement is also available on request.

3) Scope and Application

ADMISI's Overview

ADM Investor Services International Limited ('ADMISI') is a wholly owned subsidiary of Archer Daniels Midland (UK) Limited in the UK, which in turn is a wholly owned subsidiary of Archer Daniels Midland Company (ADM) in the USA (a publicly traded company).

ADMISI is a multi-asset brokerage company, based in London, UK. The company's principal activity is to act as a brokerage business on the Commodities and Securities Markets. ADMISI acts as a clearing and executing broker for clients carrying out transactions in commodity and financial futures and options, equities, equity contracts for differences, foreign exchange business and fixed income products.

Trading is primarily undertaken on a matched basis on recognised exchanges or with other brokerage firms. However, a small proportion of exchange traded derivatives business is undertaken as execution and then given up to the prime broker(s) or global clearer(s) of the client in accordance with give up agreements that are in place.

The firm does not undertake any proprietary trading activities. As no principal account positions are taken, there are no trading book positions that need to be funded. The only exceptions to this being error trades or facilitation trades (typically in foreign exchange or some commodities) that need to be traded and allocated to close a client position.

The firm does not trade OTC contracts except for Equity contracts for differences (CFDs) and spot/forward FX.

Overview of ADMISI Core Business Lines

Business undertaken by ADMISI is entirely customer driven. Key markets are commodity derivatives in metals, energy, and softs; financial derivatives in currencies and precious metals; securities markets in equities, equity and index options, equity CFDs, and fixed income; and cash FX spot and forwards in various currency pairs.

Global Commodity Markets: As a subsidiary of one of the world's leading food processors, we have a wealth of expertise in agricultural markets. Experienced and professional teams in each of the main fields of the industry - energy, metals, grains, sugar, coffee and cocoa, support this. Our 24-hour trading desk enables ADMISI to cover all aspects of the industry - around the clock and around the globe.

Global Equities, eFX and Fixed Income Markets: ADMISI Equity Division is a specialist equities broking team offering a high-quality service to both institutional and private investors across a broad range of markets, including Cash Equities, CFD's, Equity and Index Futures & Options all on Worldwide exchanges.

Global Broking & 24-hour desk is also there to support all clients trading through the time zones in all markets throughout the year.

Market Analysis: ADMISI provides market commentary covering all topics in the business; these are published on our website or delivered by email or hard copy according to the needs of individual/groups of clients.

Clearing/Straight through Processing: a highly experienced and professional team supports all aspects of clients' accounts from execution through to settlement. Clearing and Settlement capabilities are a core competency for ADMISI.

Electronic Trading Platforms/Direct Market Access: ADMISI is

able to provide access to the most dynamic trading systems in the industry in futures, options, FX, Equity CFDs and equities. ADMISI provide a full brokerage service that includes clearing and brokerage into all major investment markets and exchanges. The strategy is to provide customers access to an extensive range of investment opportunities, enabling effective risk management in all market conditions.

4) Risk Management

4.1) Introduction

ADMISI considers risk management to be fundamental to the successful achievement of its business objectives. Effective risk management underpins ADMISI's long term sustainability and growth. An enterprise-wide risk management framework is implemented across the firm. The firm's risk management approach is detailed in the Risk Management Framework of the firm. The embedded enterprise-wide risk management framework fosters the continuous monitoring of the risk environment, promotes risk awareness, managing and mitigating of risks faced by the firm.

ADMISI's Risk Culture

The Board of ADMISI view culture as the vital elements that underpins the firm's approach to Risk Management. Risk culture is defined as shared norms, attitudes, beliefs, standards that shapes behaviours including those related to risk awareness, risk taking and risk management. The risk culture for ADMISI is set as 'tone from the top' which is driven by the firm's management.

The 'ADM way' code of conduct, the various mandatory risk awareness trainings undertaken by the staff and staff induction programs are all designed to ensure ADMISI's risk culture is embedded in the fabric of the firm and governs the firm's day to day operations. This helps to ensure ADMISI's risk profile is in line with its articulated risk appetite by continuous monitoring and managing of risks. ADMISI ensures that its business strategy, risk strategy and risk appetite are linked and communicated across the firm; to ensure that decision-making at all levels of the firm reflects the firm's approach to risk management. ADMISI's culture is also reinforced in its approach to remuneration where awards are based on alignment to the firm's values, risk appetite and the achievement of financial non-financial goals of the firm.

4.2) Statement of Risk Appetite

Our Risk appetite statement expresses the maximum level of risk that we are willing to accept, under both normal and extreme market conditions, to achieve our strategic objectives. This level of acceptable risk is articulated in the firm's Risk Appetite Framework (dedicated document).

The ADMISI Board are responsible for setting the risk appetite of the business and delegating the day-to-day control and monitoring of risk to the executive management of the firm, through appropriate governance mechanisms.

ADMISI's Risk Appetite Framework is a holistic approach which includes both quantitative and qualitative metrics defined, communicated and monitored within the firm's policies, processes, limits, controls and systems.

Risk appetite limits are set at a level where if breached would necessitate immediate escalation and corrective action, without breaching the Regulators limits.

The material risks faced by ADMISI are Credit and Counterparty Risk, Market Risk, Liquidity Risk and Operational Risk. All risks faced by the firm have been analysed to determine whether they pose potential risk of harm to clients (HTC), to the firm (HTF), to the markets (HTM) or combination of the three harms.

The firm also performs regular stress testing of its clients' positions. These stress tests check the firm's financial positions and the risk profile, to ensure the firm has sufficient resilience to withstand severe global economic and idiosyncratic stresses. It also prompts the firm to produce workable action plans to mitigate such risks before the stresses materialise. Details of stress tests feed into the ICARA and the Recovery Plan.

Analysis of Material ADMISI Risks (Harms)

Credit and Counterparty Risk:

Credit risk is the risk that a counterparty will not meet its obligations under a financial instruments or customer contract leading to a financial loss. ADMISI is exposed to credit and counterparty risk through client margin obligations, the risk of possible default of counterparties, as well as banks or central counterparties defaulting on trade settlement. In addition, there is an inherent risk in the markets we operate in where clients have the ability to go to physical delivery.

Counterparty risk is monitored daily by way of client margin calls monitored by the Risk team. Other monitoring process by the Risk team includes back test breaches on a portfolio level and various in-house models to ensure margins applied will sufficiently cover market moves to mitigate possible counterparty losses.

Credit risk exposures arising from placement of deposits with banks is mitigated by through the placement of funds with banks with high credit ratings. Credit risk, for margin finance customers, is monitored in the form of periodic reviews of client financial status and quarterly reviews of clients' management accounts.

Market Risk:

Market risk is the risk of adverse movements in the values of equities, bonds, foreign currency and other financial instruments.

Market Risk faced by ADMISI is limited due to the back-to-back nature of our clients' derivatives positions, with the exception of LME calendar spreads. A strategic choice has been made not to hold proprietary positions in order to eliminate any possible conflict between house positions and of our clients positions.

Market volatility is assessed daily and live using our intraday monitoring tool. Market risk on OTC offerings is managed using in house VAR models.

The firm also faces interest rate risk as interest margin is earned on certain positions held by clients and the firm is also affected by volatility in interest rate environment.

Liquidity Risk:

Liquidity risk is the risk that ADMISI, though solvent, either does not have sufficient resources available to it to enable it to meet its obligations when they fall due or can secure them only at excessive costs. Liquidity Risk for ADMISI is mainly from holding exchange memberships with liquidity commitments.

Such memberships require debit authority to be given to CCPs/ exchanges to allow for immediate settlement of margin calls. The time lag from being called for margin by exchanges/CCPs and receiving funds from our clients creates a liquidity risk intraday and overnight. To mitigate such liquidity risk, the firm has in place a committed credit facility from its Group Company

(ADM International SARL) available to draw down during market volatility. The Risk team will also call clients for margin intraday to mitigate the liquidity risk.

Liquidity Risk for the firm also arises from significant increase and utilisation of client margin finance facilities. This risk is mitigated by strict monitoring of regularly assessing the credit worthiness of clients with margin finance facilities and limiting accessibility where necessary. Margin finance extended to its clients are unconditionally cancellable by ADMISI.

Additionally, regular stress tests are conducted for different stressed scenarios and results from these stress testing are fed into the firm's risk appetite - which ensures Liquidity contingency plans are robust and adequate.

Operational Risk:

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external causes. ADMISI maintains an Operational Risk Register – that ensure it monitors and mitigate operational risks by implementing preventive and corrective measures. The main operational risks that ADMISI is exposed to are:

1) Regulatory Risk:

This is the risk of breach of UK regulatory rules/legislation that could mean fines and sanctions being incurred which may result in ADMISI diminishing reputation in the markets. The scale and complexity of regulatory changes continues to be significant coupled with ever increasing regulatory focus on firms. Resulting in an increase in the size and frequency of regulatory fines for breaches and control weaknesses within the financial industry.

In response to the evolving regulatory landscape, ADMISI has invested in the compliance department by hiring high calibre compliance professionals. The firm has also invested in new IT system and Risk monitoring systems. There are ongoing mandatory staff trainings to ensure staff are aware and compliant with all regulatory rules.

2) Key Person Risk:

Key person risk is the risk of loss of key staff and skilled resources across the business units in ADMISI. Loss of key personnel may lead to loss of business and operational capacity affecting delivery of business objectives including loss of revenue. To mitigate this risk a remuneration retention policy is in place to address such situation. Key person risk in senior management is addressed by succession planning process by Human Resources team.

3) Reputational Risk:

The reputation and standing of ADMISI (as a separate entity and as part of the ADM Group) is important. The potential impact of any damage to the firm's reputation is assessed as a significant risk as regulatory activities are conducted on trust which will be eroded by reputational damage. This may also lead to regulatory censure in forms of regulatory fines and revoke/limit of regulatory license. ADMISI has policies and procedures in place to mitigate this risk – policies covering employee hiring, new business, business conduct policies and procedure countering fraud and corruption.

As part of the wider ADM Group – the erosion of ADMISI reputation may impact the ADM Group's reputation and vice versa.

4) **Customer Service Risk:**

This is risk is that poor customer service may lead to financial losses for the ADMISI's clients. This risk is mitigated by the firm by having a dedicated customer services function to address any customer issues promptly and limit any significant matters from arising. The company promptly deals with customer issues and complaints resulting in quick resolution.

5) **Legal/Litigation/Enforcement Risk:**

Legal arises when ADMISI operates outside the boundaries of its regulatory authorisation or offers products that are deemed illegal.

Litigation risk arises when clients allege that ADMISI has been negligent in its business activities and may allege that ADMISI does not have the right to close out against them.

Enforcement risk is when ADMISI's framework of contracts may not be enforceable, or some obligations are not valid as exercised by the firm.

The above risks are mitigated by the fact that ADMISI as an FCA regulated entity conducts its operations in accordance with regulatory permissions. ADMISI contractual frameworks are in line with market standards and have been reviewed by reputable law firms and legal opinions exist to support the validity of the contracts.

In addition, ADMISI ensures it has in place country-specific legal opinions and operational controls in place to ensure there are no concentration of clients in jurisdictions where legal enforcement is difficult.

6) **Business Continuity Risk:**

The risk that an external or internal event result in either the failure or detriment to core business processes and services – which will cause interruption to ADMISI's services to its clients (unable to execute/clear clients trades), systems outages, denial to systems as a result of cyber-attacks, vendor failure and inability to access office premises (natural disaster or as a result of terrorists acts).

To mitigate this risk, the firm has a well-tested business continuity plan in place. ADMISI has various offsite data centres around UK – these data centres are regularly tested. Additionally, all staff now have remote access to ensure seamless work from home.

7) **Cyber-Security Risk**

Cyber security is breached when access to client information and data is compromised causing financial losses and reputational risk to the firm. ADMISI has robust security policy in place - this includes anti-virus software's, monitoring procedures around USB drives. Strong firewalls, data encryption etc. ADMISI continues to invest heavily in cyber security measures and appropriate training for staffs.

8) **Vendor Risk:**

Vendor risk is the risk of major system or software outages due to vendor's disruption (insolvency or system failure). System outages will affect ADMISI's clients by the inability to trade directly or through a broker thereby causing financial harm to the customers.

ADMISI as a firm have a few third-party vendors supported systems and to mitigate this risk there are legal contracts with vendors that allows ADMISI to terminate any vendor who is unable to provide the required service. In addition, all systems especially third-party systems go through a UAT cycle and

change control before release.

9) **Processing Risk:**

This is the risk that the design and execution of client transaction processes fail to deliver protection to clients or company assets. This may arise from lack of operational and systems controls. ADMISI mitigates this risk by assessing the effectiveness of systems and controls regularly through the Risk and control self-assessment process.

10) **Fraud Risk (Internal and External):**

Fraud poses potential harm to the clients and to the firm due to losses incurred, costs and time to improve systems/controls within the firm and if fraud is of a significant value – may result in reputational damage to the firm.

The firm mitigates this harm by ensuring all new employees are subject to enhanced vetting process prior to joining the company and adhere to standard employment contracts. Third party payments/receipts are not permitted on behalf of clients. All suppliers of services are pre-approved within the ADMISI New Vendor system. Segregation of duties is also in place to mitigate this risk. Customer relationships are governed by KYC procedures, and daily transactions are monitored by the compliance team. Procurement and payments for purchases are subject to various levels of authorisations and password access controls.

Business Risk:

This the risk that the strategic goals (including the profitability and growth) of the firm may not be achieved due to internal or external uncertainties – such as suboptimal strategic decisions, macro-economic, geopolitical, industry, regulatory and other factors. In addition, there is the risk that the firm may just not be able to carry out its business plan and desired strategy.

Our business is potentially high risk - the commodity business is often associated with higher risk jurisdictions and products.

ADMISI's business strategy is regularly reviewed in light of evolving business and geopolitical environment.

ADMISI mitigates these risks by constant evaluation and analysis of different economic scenarios in order to model the impact on the firm, enabling the firm to put appropriate measures in place to minimize the potential impact on the firm.

Concentration Risk:

Concentration risk is considered with respect to our client positions and also in terms of revenues earned, the jurisdictions in which our clients operate and client types. Concentration Risk is monitored using Key Risk Indicators reported to senior management and the Board on a monthly basis. This risk is mitigated by ensuring diversification (clients, jurisdictions and earnings) are inbuilt in our business processes.

Conduct Risk:

ADMISI's Conduct Risk Framework is considered to be embedded in the culture of ADMISI. In addition to the FCA's five individual conduct rules and the FCA's senior manager conduct rules, we expect all colleagues to uphold the ADM Principles of Good Conduct.

- (a) Do the right thing the right way.
- (b) Ensure positive outcomes for clients.
- (c) Behave with integrity.
- (d) Show respect to colleagues and others.
- (e) Be responsible for your own conduct.
- (f) Reinforce expected behaviour from the top down.

4.3) Risk Management Framework

The firm has adopted the three lines of defence approach for risk management on the basis outlined below:

First Line of defence:

The first line of defence have primary ownership, responsibility and accountability for identifying, assessing, and managing risks and are assisted by business units and support functions. The first line of defence 'own' the risks and are responsible for maintaining risk exposures within risk appetite on a day-to-day basis and for implementing corrective action where there are breaches.

The first line of defence is also responsible and accountable for conducting ADMISI's activities in accordance with the company's policies and procedures. This includes adherence to the rules and regulations relevant to that area and operating within agreed limits in respect of each activity. For example, the account executives are responsible for checking all proposed client transactions are covered by client cash or collateral or credit limits before being executed, comply with exchange rules, company pricing guidelines, and adhere to relevant trading desk and client limits.

Second Line of defence:

The role of the second line of defence is to oversee and challenge the activities of the first line and facilitate the implementation of ADMISI's risk management framework. The second line of defence is the firm's internal control function. They provide independent review and challenge the first line of defence to ensure all risks are identified and managed in adherence to risk appetite. The second line of defence includes the Compliance function, Risk function and the CASS function within the firm.

The Risk and Credit team are responsible for monitoring client margin calls, collateral positions, exceptions, client margin finance line utilisation and escalating any issues to the Head of Risk and the Managing Director.

The Compliance function is responsible for drafting the company's policies and procedures and ensuring that these reflect all applicable rules and guidance set out by the exchanges and various regulators. In addition, the Compliance function implements and follows a detailed monitoring programme covering the key business and operational areas of the business. This involves monitoring adherence by each area to the company's policies and procedures, limits, and the relevant regulations. The Compliance function presents the results of its monitoring process in written reports to the Board.

The CASS team provides second line of defence on all clients' dealings/transactions firm wide ensuring client money/assets are protected end to end processes.

Third Line of defence:

The third line of defence is the provision of independent assurance to the Board and the Audit Committee on whether the first and second line of defence are operating effectively.

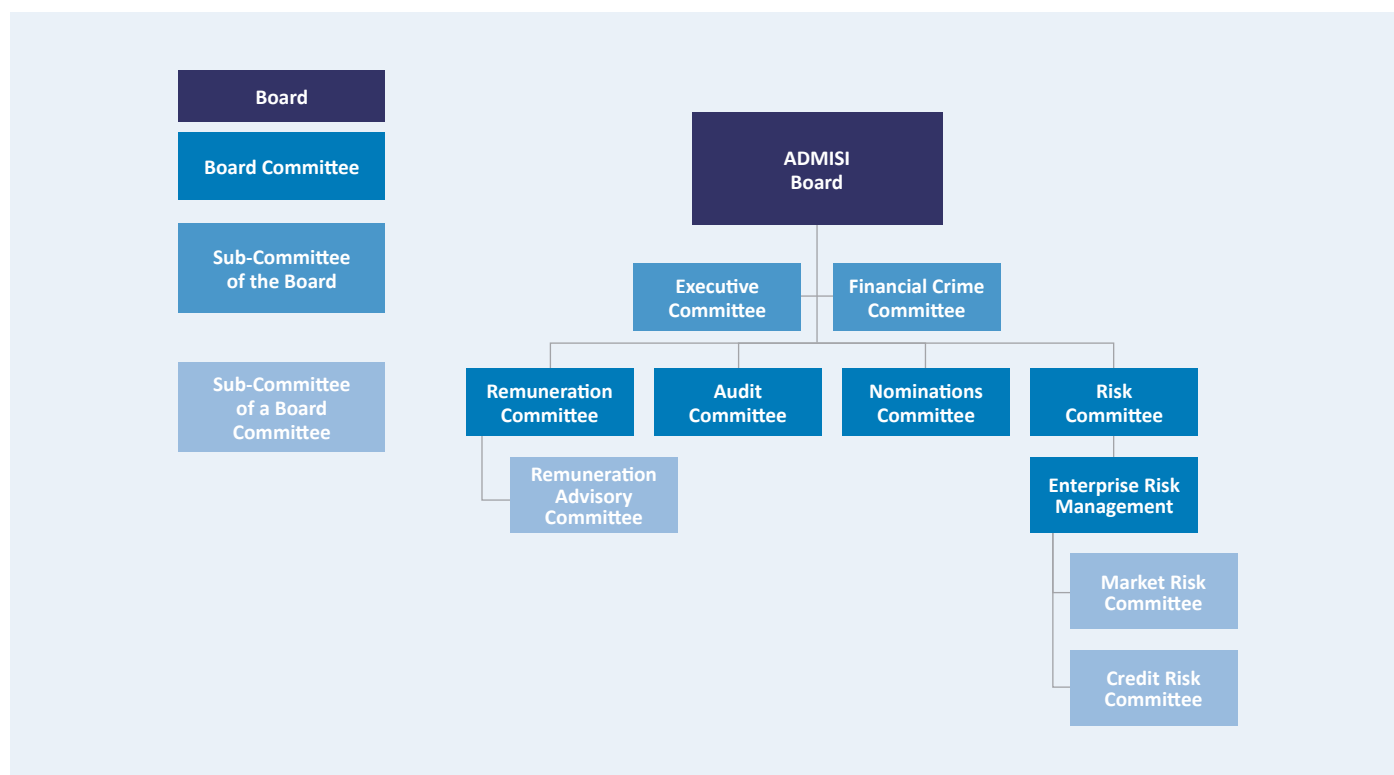
The third line of defence consist of both Internal and External Audit. This line of defence also provides assurance to the various regulators that the control culture across the firm is effective in its design and operations.

The diagram below indicates how responsibilities are assigned under the three lines of defence model:

Front line - monitoring	Second line - oversight	Third line - assurance
Client On Boarding Team (COBT) • Clients identification and validations through the on-boarding process • Ongoing clients KYC and EDD process • Monitoring clients activities • Identification of High-risk clients and managing such accordingly Sales teams • Ensuring clients adhere to trade desk limits • Adherence to exchanges rules/regulations on clients trading Operations • Clearing and settlement • Unusual transactions identification and confirmation • CCP/Broker account reconciliations Risk • Margin call and collateral positions • Set trade desk and clients trading systems limits • Limits on client activity • Client repayments Finance • Cash flows and liquidity management • Client banking instructions for payments • Bank reconciliations	Compliance • Monitor transaction activity is within limits • Compliance ensures adherence to regulators/ exchanges rules • Provide regulatory guidance and training • Advise on regulatory issues • Monitor and test compliance with company policies and procedures and with rules and regulations Risk • Monitor, collate and report risk information • Monitor margin call and collateral exceptions • Propose risk limits • Review client limits on trading systems. Credit • Review and report client margin finance line utilisation • Reviews of updated financial status of clients, CCPs, Brokers, and Banks • On-going monitoring of clients credit worthiness. Finance • Financial, liquidity and capital reporting CASS • Ensures compliance to CASS rules	Internal Audit • Conduct regular reviews, covering Finance, Risk, Compliance, Regulatory and CASS. • Provide independent assurance to Board/ADM group • Write and circulate reports to members of the Board of ADMISI, and to ADM Group senior management. • Internal audit of regulatory facing matters is outsourced to an external expert provider.

5) Risk Governance Structure

ADMISI's governance framework is proportionate to the size, nature, scope and complexity of the business activities of the firm. The framework is illustrated below:



The ADMISI Board

The Board is responsible for overseeing the management and supervision of the business of the company, including setting the strategy for the business, the assessment, management and oversight of risk, and the overall financial position of the company. The Board is also responsible for the development and sustenance of a culture that is consistent with the ADM Group's culture ("THE ADM WAY"), its core values and promotes integrity in the interaction with clients and markets. The Board is responsible for ensuring the firm's compliance with financial services law and FCA Rules and minimising the risk of regulatory failure.

The ADMISI Board of Directors comprises:

- 1) Two Executive Directors: Managing Director and Commercial Director - (Both registered SMFs).
- 2) One Non-Executive Director (NED) who is SMF registered as Chair of the Board and also the Chair of the four Board committees (the President of ADM Investor Services Inc.).
- 3) Two Non-Executive Director (NED) who is not required to be SMF registered – (CFO AG Services & Oilseed and the EMEA Regional Finance Leader).

The size of the Board is appropriate for a relatively small firm of approximately 104 people. ADMISI's ultimate shareholder is ADM and both Non-Executive Directors are ADM Group appointees. None of the Board members held external directorships as at 31 December 2024.

The ADMISI Board is responsible for creating and delivering shareholder value and for the overall governance of ADMISI. The ADMISI Board is responsible for strategic matters and providing leadership within a framework of appropriate and effective risk management controls.

Primary responsibility for governance and risk oversight rests with the Board. The Board has delegated responsibilities to committees of the Board namely Risk Committee, Audit Committee, Remuneration Committee and Nominations Committee.

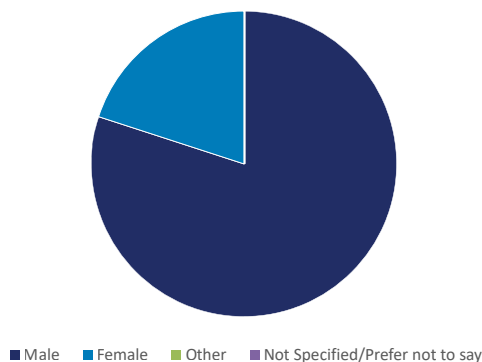
The Board meets quarterly. Minutes are kept of the meetings and actions arising from the meetings are followed up. The ADMISI Board charges the executive directors with the day-to-day control.

Board Composition

a) Board Gender Representation

	Board Members (Gender)	
	Number	%
Male	4	80
Female	1	20
Other	0	0
Not Specified/Prefer not to say	0	0

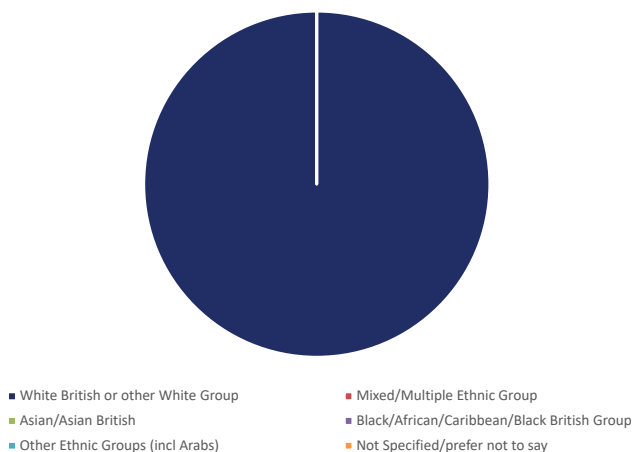
Board Gender Representation



a) Board Ethnicity Representation

	Board Members (Ethnicity)	
	Number	%
White British or other White Group	5	100
Mixed/Multiple Ethnic Group	0	0
Asian/Asian British	0	0
Black/African/Caribbean/Black British Group	0	0
Other Ethnic Groups (incl Arabs)	0	0
Not Specified/Prefer not to say	0	0

Board Ethnicity Representation



Committees of the Board

The ADMISI Board has created the following committees as committees of the ADMISI Board to deal with Risk, Audit, Remuneration and Nominations (together referred to as 'the Committees').

- 1) Risk Committee
- 2) Remuneration Committee ('Remcom')
- 3) Audit Committee
- 4) Nominations Committee

There are other committees that report to the Board or to the Board committees. These committees have delegated responsibilities from the ADMISI Board. These committees are as follows:

- Executive Committee
- Enterprise Risk Management Committee
- Financial Crime and Compliance Committee
- Remuneration Advisory Committee
- Market Risk Committee
- Credit Risk Committee

5.1) Executive Committee (ExCom):

The ExCom members have collective responsibility for implementing operational, financial and human resources/ personnel policies.

Implementation of development projects and strategic initiatives, which meet the objectives of ADMISI.

The ExCom is responsible for approving all matters relating to the rules and regulations of the company; credit and risk and identifying the material risks facing the company and ensuring appropriate arrangements are in place to control and mitigate those risks effectively.

The ExCom may delegate authority to its own committees as it deems fit. These committees support the ExCom in overseeing specific areas within ADMISI and managing principal risks, processes and specific business change projects. Reporting on the risks and controls to the Board. The committee meets every two months.

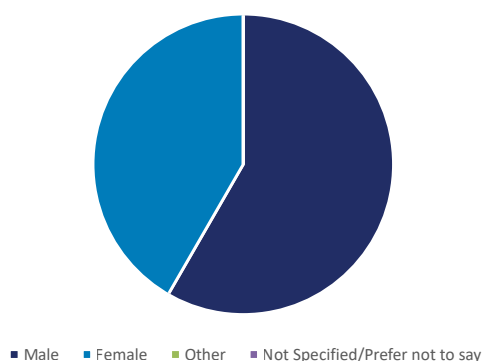
The Executive Committee consist of:

- 1) Managing Director
- 2) Commercial Director
- 3) Head of Energy Product Group
- 4) Head of Soft Commodities & Agricultural Products
- 5) Director of Finance & Treasury
- 6) Head of Information Technology
- 7) Head of Human Resources
- 8) Head of Operations
- 9) Head of Risk
- 10) Head of Compliance
- 11) MLRO & Head of Financial Crime
- 12) Client Assets Oversight Office

Executive Committee Composition

a) Executive Committee Gender Representation	Executive Committee (Gender)	
	Number	%
Male	7	58
Female	5	42
Other	0	0
Not Specified/Prefer not to say	0	0

Executive Committee Gender Diversity



b) Executive Committee Ethnic Representation	Executive Committee (Ethnic Representation)	
	Number	%
White British or other White Group	12	100
Mixed/Multiple Ethnic Group	0	0
Asian/Asian British	0	0
Black/African/Caribbean/Black British Group	0	0
Other Ethnic Groups (incl Arabs)	0	0
Not Specified/Prefer not to say	0	0

5.2) Enterprise Risk Management Committee (ERMC)

The Enterprise Risk Management Committee (ERMC) provides oversight to the risk management of the firm. The committee is responsible for development of effective Risk Management Framework by identifying, assessing, monitoring and managing of the firm's risk.

The ERM Committee has its own sub-committees namely the Credit Committee and Market Risk Committee.

The ERM committee meets quarterly, and minutes are taken of the meetings.

5.3) Financial Crime and Compliance Committee

The Financial Crime and Compliance Committee is a sub-committee of the Board that focuses on internal controls, legal, compliance, regulatory and risk issues, projects, initiatives, and high-risk clients and relating to Financial Crime and Anti-Money-Laundering (AML) Compliance and market abuse monitoring, trade & transaction reporting and other matters relating to FCA and exchange compliance.

The committee meets monthly, and minutes are taken of the meetings.

5.4) Sub-Committee of a Board Committee:

1) Remuneration Advisory Committee (RAC):

The RAC is responsible for implementing the remuneration policies set by the Remuneration Committee and for making recommendations on staff remuneration, including bonus payments, profit share agreements, reductions in variable pay and financial penalty application to the Remuneration Committee.

The committee meets quarterly.

2) Market Risk Committee:

The committee's main responsibilities of Market Risk include:

- Identifying material market risks facing the company and ensuring that appropriate arrangements are in place to control and mitigate those risks effectively.
- Discussing any proposed changes to risk procedures, processes and controls.

The market risk committee meets weekly or more frequently if deemed necessary.

3) Credit Risk Committee:

The main responsibilities of the Credit Risk Committee include considering all credit risk related matters that may affect the firm. Identifying all material credit risks facing the firm. Maintaining appropriate control arrangement to mitigate those risks. Monitoring all margin facilities, which includes request for new facilities as well as utilisation of existing facilities in line with ADMISI credit policies and ADM Group credit policy.

The committee meets monthly.

6) ADM Investor Services International Limited: Own Funds

The disclosure requirement under MIFIDPRU requires that ADMISI disclose the following:

- 1) A reconciliation of common equity Tier 1 items, Additional Tier 1 items, Tier 2 items, and the applicable filters and deductions applied in order to calculate ADMISI's own funds.
- 2) A reconciliation of Regulatory Own Funds with the Capital reported in ADMISI's Balance Sheet in the Audited Financial Statements and
- 3) The description of the main features of the common equity Tier 1 instruments, Additional Tier 1 instruments and Tier 2 instruments issued by ADMISI.
- 4) ADMISI's Own Funds as at 31 December 2024 are £103,038k – as specified in the tables below:

Table 1: Composition of Regulatory Own Funds 31 Dec 2024

Item	Amount (GBP Thousands)	Source based on reference numbers/letters of the Balance Sheet of the Audited Financial Statements
1 Own Funds	103,038	
2 Tier 1 Capital	103,038	
3 Common Equity Tier 1 Capital	103,038	
4 Fully Paid-up Capital Instruments	32,000	Note 27/SOCE
5 Share Premium	0	
6 Retained Earnings	71,301	SOCE
7 Accumulated other Comprehensive Income	0	
8 Other Reserves	1,031	SOCE
9 Adjustments to CET1 due to Prudential Filters	-1,294	Note 15/17
10 Other Funds	0	
11 (-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	-1,294	Note 15/17
19 CET1: Other Capital elements, deductions and adjustments	0	
20 ADDITIONAL TIER 1 CAPITAL	0	
21 Fully paid up, directly issued capital instruments	0	
22 Share Premium	0	
23 (-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	0	
24 Additional Tier 1: Other Capital elements, deductions and adjustments	0	
25 TIER 2 CAPITAL	0	
26 Fully paid up, directly issued capital instruments	0	
27 Share Premium	0	
28 (-) TOTAL DEDUCTIONS FROM TIER 2	0	
29 Tier 2: Other capital elements, deductions and adjustments	0	

Table 2: Own Funds: Reconciliation of Regulatory Own Funds to Balance Sheet in the Audited Financial Statements

	a	b	c
	Balance Sheet in Audited Financial Statements	Under Regulatory Scope of Consolidation	Cross-Reference to Template OF1 (above)
	31-Dec-24	31-Dec-24	
Assets: Breakdown by asset classes according to the Balance Sheet in the Audited Financial Statements			
	£'000		
Intangible Assets	224	n/a	Item 9
Tangible Assets	5,659	n/a	n/a
Investments	1,071	n/a	Item 9
Deferred Tax Asset	0	n/a	n/a
Trade and other Receivables	581,472	n/a	n/a
Cash and cash Equivalents	49,498	n/a	n/a
Total Assets	637,924		
Liabilities: Breakdown by liability classes according to the Balance Sheet in the Audited Financial Statements			
	£'000		
Trade and other payables	529,241	n/a	n/a
Provision for Liabilities	0	n/a	n/a
Long term liabilities	4,351	n/a	n/a
Total Liabilities	533,592		
Net Assets	104,332		
Shareholders' Equity			
	£'000		
Share Capital	32,000	n/a	Item 4
Other Reserves	1,031	n/a	Item 8
Retained Earnings	71,301	n/a	Item 6
Total Shareholders' Equity	104,332		

Table 3: Own Funds: Main features of Own Instruments issued by ADM Investor Services International Limited

Capital Instruments Main Features	
Issuer	ADM Investor Services International Limited
Governing Laws of the instrument	English Law
Instrument Type	Ordinary Shares
Transitional CRR Rules	32,000,000
Post transitional Rules	32,000,000
Amount recognised in Regulatory Capital as at 31 December 2022	32,000,000
Original date of Issuance	See table below

Original date of ADMISI Share Issuance

Date of Issuance	Amt of £1 Fully Paid Shares Allotted
11-Oct-90	£2
05-Jan-91	£299,998
28-Feb-92	£300,000
27-May-93	£2,000,000
30-Apr-97	£2,400,000
11-Dec-00	£5,000,000
22-Dec-11	£10,000,000
02-Mar-17	£12,000,000
Total	£32,000,000

7) ADM Investor Services International Limited: Own Funds Requirements

In accordance with MIFIDPRU4.3 ADMISI maintains own funds that is at least equal to its own funds requirement. The firm's own funds threshold requirement as at 31 December 2024 was **£23,854k**.

- Permanent Minimum Capital - **£750k**
- Fixed Overheads Requirement - **£10,137k**
- Additional Wind down - **£13,717k**
- Total K-Factors - **£11,523k**

As part of the firm's ICARA process as at September 2024, the firm assessed an additional capital of **£9,654k** as additional own funds requirement.

Total own funds requirement (including additional capital) is **£23,854k**, resulting in excess capital of **£79,183k** as at 31 December 2024.

7.1) ADM Investor Services International Limited: K-Factors components

Table 4: Own Funds: K-Factors: 31 Dec 2024

K-Factors	Amount £'000
K-TCD (Trading Counterparty Default)	7,186
K-DTF (Daily Trading Flow)	453
K-NPR (Net Position Risk)	108
K-ASA (Clients Assets Safeguarded)	194
K-CMH (Client Money Held)	3,582
Total K-Factors	11,523

8) The Overall Financial Adequacy

MIFIDPRU firms are required at all times to hold own funds and liquid assets which are adequate, both as to their amount and their quality to ensure that:

- a) Able to remain financially viable throughout the economic cycle, with the ability to address any material potential harm that may result from its ongoing activities and
- b) The firm's business can be wound down in an orderly manner, minimising harm to consumers or to other market participants.

ADMISI meets this requirement through the regular monitoring and reporting of the following:

- 1) ADMISI's own funds held compared with the own funds' thresholds.

Table 5: Own Funds Held - 31 December 2024

	Amount £'000
Own Funds Held	103,037
Own Funds Threshold Requirement	23,854
Excess Held	79,183

- 2) ADMISI's liquid assets held compared with the liquid assets thresholds

Table 6: Liquid Assets Held - 31 December 2024

	Amount £'000
Core Liquid Assets	49,498
Liquid Assets Thresholds Requirement (LATR)	15,342
Excess Held	34,157

ADMISI's Approach to assessing its compliance to the own funds adequacy rule

This is performed on a regular basis through periodic monitoring and through the annual ICARA process which is refreshed whenever there is material change in the firm's strategy or risk profile. The ICARA document is approved by the ADMISI Board.

The ICARA process is intrinsically linked with the firm's overall risk management, business planning and capital management processes – this is evidenced in the Risk Register. The ICARA process is embedded in the day-to-day management of Risk and Regulatory Capital within the firm.

The ICARA process involves a thorough assessment of the firm's business model, the markets it operates in and its clients. The result of this assessment enabled the firm to identify the risks faced by the firm and the potential harm these risks may cause. The firm embarked on the following within the ICARA process:

a) Identification of risk of harms: ADMISI reviewed its business model, operations and systems and controls to identify all material harms. This review process was a bottom to top approach. Here, we identified all potential harms to customers, harms to market and harms to firm and reviewed the systems and controls in place to monitor and mitigate these harms.

b) Assessment of likelihood and impact of crystallisation of risk of harms: Based on the firm's history, experience and market knowledge, the firm was able to estimate the likelihood of these

harms happening and the potential impact of the event. The likelihood and impact of risk of harm is captured within the firm's stressed scenario analysis and results.

c) Mitigate risk of harms: Here the firm implemented both financial and non-financial risk mitigation to minimise the probability and impact of risk arising. Risk mitigation processes are captured within the Risk Register.

d) Evaluate and mitigate residual risk: Here ADMISI assessed whether its risk mitigation of material risks is effective i.e., the risk mitigation fully minimises the likelihood of such risk occurring. Where this is not the case, ADMISI has allocated additional capital resources and/or Liquid resources to mitigate any residual risks arising from the firm's business model.

e) The effect of these potential harms is evidenced in the firm's stressed scenarios. The impact of the various harms and the firm's ability to mitigate and recover from these harms are discussed within the Risk assessment section of the document.

f) Recovery from stress: Here ADMISI identified management recovery actions that will enable it to recover from stress events. This is discussed within the Recovery section of the document.

g) Wind down plan: ADMISI assessed the situation where its recovery plan may fail to help the firm recover. The wind down assessment identifies the processes of wind down, the timelines and the wind down costs. This is discussed in the wind down section of the document.

9) Remuneration Code

9.1) Firm classification: Under the MIFIDPRU ADMISI is classified as a Non-SNI Investment Firm.

Remuneration Policy

ADMISI's remuneration policy (the Remuneration Policy) applies to both executives and employees in the firm. The Remuneration Policy is in addition to the ADM (Archer Daniels Midland) Corporate Group Remuneration Policy which ensures employees efforts are focused on the company's key business goals and employees are rewarded appropriately for these efforts. The Remuneration Policy is reviewed and signed off by the Remuneration Committee on behalf of the ADMISI Board and changes are adopted annually.

9.2) Remuneration Governance

The Remuneration committee ('RemCom' - Committee of the ADMISI Board) consists of:

Two Non-Executive Directors and works with 'The Remuneration Advisory Committee' (RAC) – who advises the RemCom.

The RemCom is responsible for setting the Remuneration Policy for all Executive Directors and employees of ADMISI, including pension rights and any compensation payment. The RemCom ensures all compensation payments are in line with the FCA Remuneration Code and the ADM Corporate Group remuneration policy.

The Remuneration Policy is regularly reviewed and updated in line with the MIFIDPRU Remuneration code.

The RemCom held one meeting between 1 January 2024 and 31 December 2024.

9.3) Remuneration Philosophy and Objectives

ADMISI's Remuneration Policy is designed to comply with the FCA Remuneration Code. In addition, ADMISI complies with the ADM Corporate Group Remuneration Philosophy and objectives. The ADM Group, in order to achieve its objectives must attract, engage and retain highly talented individuals who are committed to the Group's core values of integrity, excellence, teamwork, resourcefulness, responsibility and respect for others. Our compensation and benefit programs are based on the following ADM Group objectives:

- **Reinforce a high-performance culture:** Linking short- and long-term compensation with individual and company performance.
- **Emphasize the long-term:** Structuring executive compensation to include a significant percentage of long-term equity awards.
- **Focus on Results:** Rewarding executives for long term value creation, excellence in leadership and implementing our business strategy.
- **Remain Market Competitive:** Providing compensation that is consistent with the scope of responsibilities of the role with other comparable organisation to attract and retain high quality executive talent.
- **Align with Risk Appetite and Conduct framework:** Employees and executives' compensation is designed to align with the firm's risk appetite and conduct expectations.
- **Maintain Internal Equity:** Structuring compensation and benefit programs with consistent features for employees and executives across the organisation.

9.4) Remuneration structure

Fixed Base Salary

ADMISI sets fixed salaries taking into consideration economic conditions, company performance and sustainability. In addition to fixed base salary, employees are also provided with competitive package of benefits including pension schemes (all pension schemes are defined contribution pension) and healthcare. The firm ensure that:

- a) The fixed and variable components of total remuneration are appropriately balanced, and
- b) The Fixed component represents a sufficiently high proportion of the total r remuneration.

Variable Remuneration:

Bonus Pool and Variable Remuneration Allocations

- a) **Employees who are neither Account Executives nor Material Risk Takers (MRTs):** Subject to profitability, bonuses are paid annually to non-income generating employees based on annual performance review from a bonus pool. The bonus pool is capped by a contractual agreement between ADMISI and ADM Group.

The Remuneration Policy is structured in such a way that variable remuneration for employees who are neither Account Executives nor MRTs is not guaranteed and entirely at ADMISI's discretionary.

- b) **Employees who are Account Executives but not MRTs:** Account Executives are the brokers who work on dealing desks and engage with the clients who execute transactions through ADMISI. Each dealing desk has its own commission sharing agreement; the percentages are fixed in advance. Commission sharing payments are paid from Desk's Net Income (after overhead costs have been deducted). All commission sharing payments are subject to the level of individual desk profitability and are therefore not guaranteed.
- c) All bonus and commission sharing payments are dependant on the relevant employee's non-financial conduct and behaviour.
- d) The firm does not pay variable remuneration to members of the Board who do not perform any executive function in the firm.

Material Risk Takers (MRTs)

The firm regularly assesses which of its staffs are material risk takers (MRTs):

- Staff whose professional activities have a material impact on the risk profile of the firm or assets managed.
- Staff who are members of the Board in its management functions.
- Staff who are members of the Board in its supervisory functions.
- Staff who are members of senior management.
- Staff members who have managerial responsibility for business units carrying out regulated activities (as described by the regulator).
- Staff members with managerial responsibilities for activities of a control function.
- Staff members with managerial responsibilities for the prevention of money laundering and terrorist financing.
- Staff members who are responsible for managing a material

risk within the firm.

- Staff members responsible for managing information technology, information security and/or outsourcing arrangement of critical or important functions within the firm.

Based on the above criteria, the following roles have been identified as Material Risk Takers (MRTs) as during 2024:

- a) **Management function on the Board of ADMISI:**
 - Managing Director (SMF1 & SMF3)
 - Compliance Director (SMF3 & SMF16)
 - Commercial Director (SMF3)
- b) **Senior Management SMFs:**
 - SMF2: Director of Finance and Treasury
 - SMF4: Head of Risk
 - SMF24: Head of Operations
 - SMF17: Head of Financial Crime & MLRO
 - SMF18: Head of Global Commodities
 - SMF18: HR Manager
 - SMF18: CASS Oversight Officer
 - SMF24: Head of Information Technology
- c) **Head of Gibraltar Branch**

The MRTs list is subject to regular review.

Financial assessment of MRTs Variable Remuneration.

The firm ensures that MRT quantitative performance-related variable remuneration is based on a combination of assessment of the performance of the individual and the overall results of the firm.

The assessment of MRTs performance is part of a multi-year framework that ensures:

- The assessment of performance is based on a longer-term performance and
- The payment of performance-based remuneration is spread over a period that takes into the account the business cycle of the firm and its business risks.
- Applicable to MRTs whose total variable remuneration exceeds £167,000 per annum.
- Applicable to MRTs whose annual variable remuneration is greater than one-third of total annual remuneration.

Non-standard forms of variable remuneration:

General:

- a) All variable remuneration, retention awards, severance pay and buy-out awards are subject to malus and claw-back and are included in the appropriate ratio between the variable and fixed components of the total remuneration.
- b) **Guaranteed variable remuneration:** The firm does not permit guaranteed variable remuneration (sign-on bonus, golden handshake or lost opportunity award to MRT unless
 - i) it occurs in the context of hiring a new MRT
 - ii) Limited to the first year of service
 - iii) The firm has a strong capital base.
- c) **Retention Award:** The firm will only grant retention award to its MRTs
 - i) after a defined event
 - ii) at a specified point in time.
- d) **Severance Pay:** Severance pay (other than for contractually mandated notice periods) is only at the firm's absolute discretion.

Bonus Deferral and Retention Policy

MRTs Variable Remuneration

The ADMISI Deferred Bonus Plan (the “DBP”) applies to MRTs whose annual variable remuneration is (a) £167,000 or more or (b) is one-third or more of the MRT’s total annual remuneration.

The DBP provides that 50% of each MRT’s variable remuneration is granted as a restricted performance unit award and 50% is granted as cash. 40% or (60% if the annual variable remuneration is £500,000 or more) of the variable remuneration is deferred for three years, vesting on a pro-rata basis during this time.

The value of restricted performance units is based on the net asset value of ADMISI’s shares, which may go up or down dependant on the financial performance of the company. The net asset value of ADMISI’s shares is considered the best measure of the value of the restricted performance units because ADMISI is a private company and its shares are not publicly traded.

Shares, Investment and Alternative arrangements

Equity- Based Long Term Incentives

Participation in ADM’s Long term incentive program (the ‘LTIP’) is restricted to the executive directors of ADMISI. The LTIP aligns the interest of the directors with those of shareholders by driving long-term shareholders value, supporting stock ownership and encouraging long-term service with the company. Here, participants may be granted various LTIP awards (Restricted units stocks in ADM) relating to their performance and the performance of ADM. LTIP awards are granted as a number of ADM shares that vest over three years.

Risk Adjustment

Variable remuneration is subject to malus or clawback arrangement as follows: -

- a) For all staff (MRTs and non-MRTs) the RemCom reserves the right to adjust down or withhold variable remuneration of an individual before pay-out (malus) if there are adverse conduct issues or if their behaviour adversely affects the firm’s performance.
- b) For MRTs the firm reserves the right to clawback any awarded variable remuneration after pay-out, if adverse conduct issues become known after pay-out or the firm’s performance is discovered to have been adversely affected by the actions of the relevant MRTs.

9.4) Remuneration for Financial Year ending 31 December 2024

	Senior Management (MRT's)	Other Material Risk Takers (MRT's)	Other Staff (Non-MRT's)
Number of Staff	3	11	90
	GBP	GBP	GBP
Fixed Remuneration	700,770	1,399,168	6,879,520
Variable Remuneration	864,986	514,371	2,741,024
- of which: Deferred Remuneration	656,988	219,034	-
Total Remuneration	1,565,756	1,913,539	9,620,544

ADMISI as a Non-SNI Investment firm in addition to the above disclosures must also disclose the following information for senior management and other Material Risk Takers:

- The total amount of guaranteed variable remuneration awards made during the financial year and the number of Material Risk Takers receiving those awards: **ADMISI did not award any guaranteed variable remuneration to senior management or any Material Risk Takers during the financial year ending 31 December 2024.**
- The total amount of severance payments award during the financial year and the number of Material Risk Takers receiving those payment: **No severance was awarded during the financial year ending 31 December 2024 to any Material Risk Taker.**
- The total amount of the highest severance payment awarded to an individual Material Risk Taker: **No severance was awarded during the financial year ending 31 December 2024 to any Material Risk Taker.**