



Introduction

The following information applies to E D & F Man Capital Markets Inc. (“MCM”) and its affiliated entities.

Anti-Money Laundering Program and Customer Identification

Under the US Patriot Act, we are required to establish and maintain an Anti-Money Laundering Program (“AML”). US Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account with MCM. When an account is opened, we will ask for your name, address, date of birth and a copy of a valid form of government issued photo identification. A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government issued business license, partnership agreement or trust agreement.

Privacy Policy

MCM is a broker/dealer registered with FINRA and a futures commission merchant registered with the NFA. As a customer of MCM, we believe that protecting your privacy is extremely important and MCM wants to be certain that we maintain the confidence and trust of our customers. We collect nonpublic information on the new account documents as well as trade records. We may share this information with our clearing agent(s) in order to complete all transactions entered with MCM. We do not otherwise disclose or share any nonpublic information about our customers or former customers to anyone, except as required by law. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic information. In the event that you close your account with MCM, we will adhere to the privacy policies and practices as described in this notice.

Business Continuity Plan Summary

We have prepared and maintain a current Business Continuity Plan (“BCP”) in compliance with NASD, NFA and other applicable rules. The following information summarizes our plan to continue business and meet our existing obligations to customers in the event of a Significant Business Disruption (“SBD”).

MCM’s policy is to respond to a SBD by safeguarding employee’s lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm’s books and records, and allowing our customers to transact business. We will make every reasonable effort to meet our obligations to customers at all times. Our plan anticipates two kinds of SBD’s, internal and external. Internal SBD’s affect only our firm’s ability to communicate and do business. External SBD’s prevent the operation of the markets or a number of firms, such as a terrorist attack, a flood or wide-scale disruption. In the event that we determine that we are unable to continue the normal conduct of our business, due to any of the scenarios described above or any other circumstances, we will enact our BCP in order to assure customers prompt access to their funds and securities. Our BCP outlines back-up facilities and arrangements that will be utilized in these circumstances. We will make every effort to continue to conduct business during any SBD employing the use of our BCP. We plan to conduct business during any SBD unless circumstances prohibit us from doing so. If, for any reason, we are forced by circumstances outside of our control to halt business we will immediately determine our planned recovery time and communicate those plans to all concerned parties.



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E D & F Man Capital Markets Inc.

Notice Concerning SEC Rule 606

The US Securities and Exchange Commission Rule 606 of Regulation NMS requires all broker-dealers to make their order routing practices for non-directed orders publicly available. The rule excludes from the quarterly report those orders that are directed by a customer to a particular exchange or market for execution. Rule 606 also requires broker-dealers to provide customers a written copy of the report of the venues to which the customer's individual orders were routed upon request. MCM's most recent report is available on the Quarterly Order Routing Disclosure Reports page on the Core One/ Vista One link provided below. Click on the appropriate quarter to access the data for the relevant time period.

Important Contact Information

SIPC – www.sipc.org or (202) 371-8300

FINRA – www.finra.org or (301) 590-6500

NFA – www.nfa.futures.org or (312) 781-1300

VistOne (Rule 606 Reports) - <http://vrs.vista-one-solutions.com/reports/>