

MIFIDPRU DISCLOSURE

Financial Year 2025

1. Overview

Sumitomo Corporation Global Commodities Limited (“SCGC”, “Sumitomo”, or “the Firm”) is FCA-regulated firm, a MiFID Investment Firm and an EMIR Financial counterparty (538822). SCGC’s principal activity is Commodity Trading. SCGC provides services to Professional Clients and Eligible Counterparties.

SCGC is a MiFID Investment Firm and was founded in 2006 and is based in London. SCGC is owned by Sumitomo Corporation (“SC”) in Japan and is the only specialised commodity derivatives firm in the SC Group of companies.

SCGC was authorised by the Financial Conduct in 2011 under FRN 538822, and currently holds the following permissions:

- *Arranging (bring about) deals in investments*
- *Bidding in emissions auctions*
- *Dealing in investments as agent*
- *Dealing in investments as principal*
- *Making arrangements with a view to transactions in investments*
- *Agreeing to carry on a regulated activity*

As an authorised firm, SCGC is required to disclose information relating to the capital it holds and each material category of risk or harm it faces. These disclosures are made in accordance with the rules of the Investment Firm Prudential Regime (IFPR), which came into force on the 1 January 2022.

SCGC falls within the category of a non-SNI firm under IFPR and believes that the disclosures in this document meets the disclosures required under MIFIDPRU8.

2. Firm Overview

The Board of SCGC has the daily management oversight responsibility and meets at a minimum on a quarterly basis. The Management Team is composed of:

- Peter Drabwell – CEO
- Tetsu Oura – Executive Director
- Shintaro Tagaki – Executive Director
- Hideyuki Kambayashi – Non-Executive Director

The Management Team is responsible for the entire process of risk management, as well as measuring the effectiveness of the process. In addition, the Management Team decides SCGC’s risk appetite or tolerance for risk and ensures that SCGC has implemented as effective, ongoing process to identify risks, to measure potential impact and to ensure that such risks are appropriately managed. The Management Team is responsible for designing, implementing and monitoring the process of risk management and implementing the day-to-day business activities of SCGC.

3. Frequency of Disclosure and Means of Disclosure

SCGC updates this disclosure annually or upon material change. These disclosures are based on the company's position as at the 31st March 2026]. These disclosures have been reviewed by the Directors and are not subject to an audit except to the extent where they are equivalent to disclosures made under accounting requirements

4. MIFIDPRU

As a non-SNI firm, SCGC must always maintain 'own funds' that are at least equal to its 'own funds requirement', which is the higher of:

- £750,000 (Permanent Minimum Requirement 'PMR') or
- Fixed Overhead Requirement ('FOR')

FOR is equal to $\frac{1}{4}$ of the relevant expenditure in the previous year.

SCGC must also hold an amount of core liquid assets that is at least equal to the sum of:

- $\frac{1}{3}$ of the amount of its FOR; and
- 1.6% of the total amount of any guarantees provided to clients.

A full breakdown of SCGC's own funds can be found in Appendix 1.

5. Risk Management

The Directors and Senior Managers determine SCGC's business strategy and risk appetite along with designing and implementing a risk management framework that recognises the risks that the business faces. They also determine how those risks may be mitigated and assess on an ongoing basis the arrangements to manage those risks.

The Directors meet on a regular basis and discuss current projections for profitability and regulatory capital management, business planning and risk management. The Directors manage the Firm's risks through a framework of policy and procedures having regard to relevant laws, standards, principles and rules (including FCA principles and rules) with the aim to operate a defined and transparent risk management framework. These policies and procedures are updated as required.

The company is small with an operational infrastructure appropriate to its size. It carries no market risk, other than foreign exchange risk on its accounts receivable in foreign currency, and a limited amount of credit risk. The ICARA has identified the most significant risk types to which SCGC to be as follows:

Operational Risk

Operational Risk is defined as the risk of loss resulting from inadequate or failed internal processes, people activities, systems or external events. SCGC is exposed to operational risk in several facets of its role as an intermediary in financial markets, such as:

- Employees (both broking and support staff) undertaking their roles correctly and behaving appropriately;
- Multiple IT platforms (including broking, middle office and support platforms);
- The accurate execution of many processes including those required to execute trades; and
- The continued availability of various third-party market infrastructure providers (such as clearing and settlement institutions).

Market Risk

This is the risk that external factors -such as a reduction in trading volumes - will result in an unexpected loss of income. There is a risk that the economic demand for trading reduces because of a weakening economic environment. These risks are mitigated by a large, diversified and loyal client base and an

ability to trade in multiple products and markets. Staff are paid performance bonuses allowing reduced overheads in periods of reduced activity. SCGC is subject to further market risk due to foreign exchange risk on trade debtors in non-GBP currencies. The Directors review these risks as part of its financial control process and manages the risk accordingly.

Credit Risk

This is the risk that clients and counterparties fail to meet their financial and commercial obligations. There is a risk that SCGC's clients and counterparties fail to accept a trade for whatever reason. The mitigation is that the trades are given up and settled promptly, ensuring minimal exposure to financial markets. SCGC does not have a trading book and does not take any proprietary positions. SCGC does not hold any client money.

6. Capital Adequacy in Compliance With MIFIDPRU

As at 31st March 2026, SCGC holds regulatory capital resources of £132,292,517 comprised solely of core Tier 1 capital.

SCGC's assessment of capital adequacy pursuant to the Internal Capital and Risk Assessment (ICARA) process, which takes into consideration harm, wind down stress and scenario assessments), has not identified capital to be held *over* and *above* the former Pillar 1 requirements, the capital resources detailed above are considered adequate to continue to finance SCGC over the next year. No additional capital injections are considered necessary and SCGC expects to continue to be profitable.

7. Remuneration

SCGC has adopted a remuneration policy and procedures that comply with the requirements of MiFIDPRU and SYSC 19G, which considers qualitative, quantitative and all the proportionality elements in line with the FCA Guidance. SCGC's policies and practices continue to promote diversity within the Management Team.

SCGC's remuneration policy is designed to ensure that the Firm does not encourage excessive risk taking and staff interests are aligned with those of the clients. SCGC's remuneration policy promotes sound and effective risk management and does not encourage risk-taking by any individuals within the firm which exceeds our levels of risk tolerance.

SCGC's Remuneration Policy, is based on the following principles that guide the compensation programs and consequent actions:

- Fairness and consistency with the responsibilities assigned and the capabilities demonstrated
- Alignment with the company strategies and with the defined objectives
- Competitiveness regarding practices and market trends
- Enhancement of merit and performance, in terms of results, behaviour and values acted
- Clear governance and compliance of regulatory framework

SCGC's main policy is to offer competitive remuneration packages to all its employees. Market research (benchmarking) is conducted to enable the practices to be parallel in quality and value with the general conditions present within the market. No individual will be dependent on variable remuneration to an extent that that makes up their majority of their total remuneration.

The remuneration policy and related practices are determined with regards to common interests of partners, employees, and clients. SCGC's remuneration policy consists of base salaries, as well as performance-based bonuses and benefits. This policy is designed to attract, retain, and motivate staff at all levels, and is consistent with the objectives outlined in the business strategy through:

- An appropriate balance between variable and fixed component.
- A proper connection with the remuneration of individual performance and the company.
- Fixed remuneration is determined by experience and aptitude for the role and reflects the staff members professional experience and organisational responsibilities as set out in their contract of employment with SCGC. This will be permanent, pre-determined, non-discretionary, non-revocable and not dependent on performance.

Variable remuneration is determined by contribution and performance within the last calendar year. It reflects the long-term performance of the staff member as well as performance against the staff member's terms of employment. SCGC ratio between variable and fixed components of the total remuneration, has been established to ensure that the components are appropriately balanced and that the fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a fully flexible policy on variable remuneration. This allows for the possibility of paying no variable remuneration component, which the firm would do in certain situations, such as where the firm's profitability performance is particularly constrained, or where there is a risk that the firm may not be able to meet its capital or liquidity regulatory requirements.

The below table summarises the financial and non-financial criteria of performance used across the Firm in assessing the level of variable remuneration to be paid:

	Financial Performance Criteria	Non-Financial Performance Criteria
Firm	- Firm Wide Performance Targets	
Business Unit	- New Business Growth - Business Maintained - Performance Targets	- Process efficiencies - Introduction of new processes/products
Individual	- KPI's achieved	- Training Completed - No Conduct Breaches - No Discipline Issues

The FCA defines Material Risk Takers ("MRT") as senior management, risk takers, staff engaged in the management of control functions and any employee receiving total remuneration that takes them into the same remuneration bracket as those detailed above, whose professional activities have a material impact on the firm's risk profile. In addition to Senior Managers, SCGC has identified the following persons to be Material Risk Takers:

Anis Abou Rahme
Natalia Evgrachina
Hussein Hassan
Kazuya Furusato
Kazuya Uchida
Dalvir Kler

Mariko Nakamura
 Peter Drabwell
 Neal Davies
 John Clark
 Thomas Bartlett
 Henry Kambayashi
 Shintaro Tagaki

SCGC is not required under MIFIDPRU 7.3.1R to establish a risk committee. Senior Management is directly responsible for the overall remuneration policy which is reviewed annually. SCGC's remuneration is offered as fixed and variable in line with SYSC 19G and MIFIDPRU and variable remuneration is adjusted in line with capital and liquidity requirements as well as the Firm's overall performance. Senior Management review the remuneration strategy on an annual basis together with the remuneration itself.

Remuneration Paid FY 2025

The below table quantifies the remuneration paid to staff in the financial year 1 January 2025 to 31 December 2025. For these purposes, 'staff' is defined broadly, and includes, for example, employees of the Firm itself, partners or members, employees of other entities in the group, employees of joint service companies, and secondees:

Period: 2025 Financial Year		MRT	Non-MRT
Remuneration Awarded (£)	Fixed	5,338,633	4,478,325
	Variable	4,418,416	876,595
	Total	9,757,049	5,354,920
Remuneration Awarded to SMF's (£)	Fixed	954,984	0
	Variable	476,177	0
	Total	1,431,161	0
Remuneration Awarded to Other MRT's (£)	Fixed	4,506,215	0
	Variable	3,996,225	0
	Total	8,502,440	0
Deferred Remuneration (£)	Total	1,237,156	0
Performance Adjustment (Malus/Clawback) (£)		0	0

Monitoring of Compliance with the Remuneration Policy

Remuneration for all employees is set by the Directors and the Firm's Remuneration Policy takes full account of the Firm's strategic objectives. Its objective is to recognise and reward excellent performance of employees to help drive the sustainable growth of SCGC. The Firm continually monitors that their aim to promote diversity within the management team is being achieved, along with monitoring the fixed to variable compensation to ensure SYSC 19G and the provisions of MIFIDPRU are adhered to with respect to Total Compensation where applicable. As at 31/03/2026 SCGC has not identified any shortfalls.

8. Complaints

We are committed to providing the highest level of service to our clients. We value feedback and take any expression of dissatisfaction seriously. Our Complaints Policy outlines how we handle and resolve any concerns you may raise.

How to Make a Complaint

If you are dissatisfied with any aspect of our service, you may contact our Compliance Officer.

Compliance Officer: John Clark

Email: john.clark@scgcuk.com

Please provide the following information to help us investigate your complaint efficiently:

- Your full name and contact details
- A clear description of your complaint
- Any relevant documents or correspondence

How We Handle Complaints

- We will acknowledge receipt of your complaint within five business days.
- We aim to investigate and resolve your complaint promptly and fairly.
- A final written response will be provided within eight weeks of receiving your complaint.

If we are unable to resolve your complaint within this timeframe, we will explain why and let you know when you can expect a final response.

APPENDIX 1: OWN FUNDS DISCLOSURE
SCGC's Regulatory Capital Adequacy £'000

Composition of regulatory own funds			
	Item	Amount (GBP thousands)	Source based on reference numbers/letters of the balance sheet in the audited financial statements
1	OWN FUNDS	132,293	Total capital: USD175,023
2	TIER 1 CAPITAL	132,293	
3	COMMON EQUITY TIER 1 CAPITAL	132,293	
4	Fully paid up capital instruments	17,007	USD 22,500
5	Share premium	8,843	USD11,700
6	Retained earnings	106,442	USD 140,823
7	Accumulated other comprehensive income		
8	Other reserves		
9	Adjustments to CET1 due to prudential filters		
10	Other funds		
11	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1		
19	CET1: Other capital elements, deductions and adjustments		
20	ADDITIONAL TIER 1 CAPITAL		
21	Fully paid up, directly issued capital instruments		
22	Share premium		
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1		
24	Additional Tier 1: Other capital elements, deductions and adjustments		
25	TIER 2 CAPITAL		
26	Fully paid up, directly issued capital instruments		
27	Share premium		
28	(-) TOTAL DEDUCTIONS FROM TIER 2		
29	Tier 2: Other capital elements, deductions and adjustments		

Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements				
		a	b	c
		Balance sheet as in published/audited financial statements	Under regulatory scope of consolidation	Cross-reference to template OF1
		As at period end	As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the audited financial statements				
1	Intangible assets	655		
2	Tangible assets	39		
3	Other financial assets	160,866		
4	Tax asset	1,027		
5	Total non-current assets	162,587		
6	Stocks	204,360		
7	Debtors	2,246,175		
8	Cash at bank and in hand	3,893		
9	Other financial assets	1,209,331		
xxx	Total Assets	3,826,345		
Liabilities - Breakdown by liability classes according to the balance sheet in the audited financial statements				
1	Trade and other payables	2,168,149		
2	Loans and borrowings	66,351		
3	Other current financial liabilities	1,276,030		
4	Advances received	21		
	Accrued expenses	13,617		
	Total current liabilities	3,524,169		
	Creditors: amounts falling due after more than one year	169,884		
xxx	Total Liabilities	3,694,053		
Shareholders' Equity				
1	Called up share capital	17,007		
2	Share premium reserve	8,844		
3	Profit and loss account /retained earnings	106,442		
xxx	Total Shareholders' equity	132,293		

