part of eex group

ecc

SINGAPORE RISK DISCLOSURES

25.08.2026
Leipzig

Ref. V2

Risk Disclosures pursuant to conditions of recognition by the Monetary Authority of Singapore ("MAS")

The Risk Disclosures contained in this document are provided only to Participants[1] of European Commodity Clearing AG ("ECC") and only for the purposes of compliance with of the Recognition Conditions issued by MAS addressed to ECC as laid down in Annex A of the letter from MAS to ECC dated 26 March 2018. In addition, this document should be read in conjunction with the Clearing Conditions of ECC (the "Clearing Conditions"), which are accessible at the following weblink:

https://www.ecc.de/en/rules-regulations/rules#1793

Unless otherwise indicated or expressly defined in this document, the respective rights and obligations of ECC AG, the Clearing Member and the Non-Clearing Member are set forth in the Clearing Conditions of ECC in the respective current German version. In addition, the rules and regulations of the respective market in the respectively valid version shall apply as a supplement with regard to the Participant taking part in clearing on ECC. Capitalised terms used in this document which are also used in the Clearing Conditions shall have the meanings ascribed to them in the Clearing Conditions for ECC. The information in the Clearing Conditions is subject to change and the most current version published on the relevant weblink listed above shall be deemed to be the authoritative version of the Clearing Conditions.

This document, its contents and any other documents referred to or incorporated by reference into this document **DO NOT** (and **are NOT INTENDED** in any way to) create any contractual relationships or legal obligations between ECC and any Participant (or any other person), nor do this document, its contents or any other documents referred to or incorporated by reference into this document constitute any form of advice (legal or otherwise) from or by ECC to any Participant (or any other person).

All Participants should separately seek and rely on independent legal, tax and financial advice before and during their participation on ECC or the utilisation of any clearing services offered by ECC.

[1] "Participant" means:
(a) a corporation incorporated in Singapore or which has a place of business in Singapore (note: for foreign-incorporated corporations operating in Singapore through a branch, this refers only to the part of the business that is operated through the branch in Singapore.);
(b) an individual who is a Singapore citizen or resident in Singapore; and
(c) any other person in Singapore, for whom ECC (whether directly or indirectly) carries on clearing or settlement of transactions. For Participants not incorporated in Singapore but operate in Singapore through a branch, this refers only to the part of the business that is operated through the branch in Singapore.

1. Regulatory Status

ECC is a recognised clearing house (RCH) under Section 51(2) of the Singapore Securities and Futures Act (Cap. 289) ("SFA"). Under its RCH licence, ECC is authorised by MAS to operate a clearing facility for the clearing and settlement of specified instruments that are derivatives contracts[2]. A recognized clearing house may only provide clearing services to Participants that are not retail investors in Singapore.[3]

ECC is subject to regulatory supervision by the German Federal Financial Supervisory Authority ("BaFin") and the German Central Bank (Deutsche Bundesbank), and authorised as a central counterparty under Regulation (EU) No 648/2012 of the European Parliament and the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories ("EMIR"). ECC is authorised by BaFin to offer its services and conduct its activities in the European Union. It is primarily subject to and governed by the laws of Germany and the European Union. For more information on ECC's regulatory status, please refer to publicly available information at the following weblinks:

https://www.ecc.de/en/about-ecc/company
https://www.ecc.de/en/about-ecc/governance/regulatory-framework

2. Rights and Remedies

The rights and remedies available to Participants accessing ECC, as stated in the rules, procedures and policies of ECC, will be governed by the laws of Germany and the European Union, and these may differ from the rights and remedies available to Participants accessing approved clearing houses in Singapore which are primarily regulated by MAS and governed by Singapore laws.

3. Segregation Models of ECC and Costs

A general overview of each of the clearing models currently offered by ECC (the "Clearing Models") that provide for different levels of client segregation and protection can be found under the weblinks:

https://www.ecc.de/en/clearing/emir/segregation-and-portability
https://www.ecc.de/en/risk-management/default-management

[2] "Derivatives contracts" have the respective meanings ascribed to them in the SFA.

[3] For the purposes hereof the term retail investor shall comprise any investor domiciled in Singapore other than an institutional investor, accredited investor or expert investor within the meaning of the SFA.

This includes information on the main legal implications of the respective levels of segregation and applicable insolvency law, which may differ from those of Singapore insolvency law.

ECC does not charge separate fees for the use of a specific Clearing Model. Costs related to clearing are set out in the price list of ECC, which is accessible at

https://www.ecc.de/en/rules-regulations/rules#64164

4. Risks arising from ECC's Insolvency, and Differences in Taxation Laws, Foreign Exchange Rates and Time Zones between Germany and Singapore

As an authorised credit institution according to the German Banking Act and authorised CCP according to EMIR, ECC is subject to the insolvency laws of Germany and not Singapore. Hence, the effects of an insolvency of ECC may differ from those of a Singapore clearing house. The information on segregation models referenced in section 3 of this Risk Disclosures document highlights how some of the arrangements under the Clearing Models are subject to insolvency laws applicable to ECC.

Due to its statutory seat in Leipzig, Germany, ECC is subject to applicable domestic and European taxation laws. The fact that ECC is not subject to Singaporean tax law may have an impact on the taxation of Participants' transactions with ECC compared to clearing and settlement through a Singaporean clearing house.

Given that the trades and products cleared at ECC are denominated in currencies other than Singapore Dollars and require collateral in the form of cash or securities denominated in currencies other than Singapore Dollars to be posted as margin, Participants are subject to foreign exchange movements and may incur foreign exchange conversion losses.

Given that trades cleared at ECC are subject to business hours and settlement timelines that may differ from such business hours of Participants operating in Singapore, the time zone differences may pose risk since Singapore business hours are 6 respectively 7 hours ahead of Germany.

The above disclosures do not and would not provide an exhaustive list of all the possible risks to Participants in relation to their participation on ECC.