



**LIME TRADING CORP.
DISCLOSURE DOCUMENT PURSUANT
TO CFTC RULE §1.55(k)**

Updated: October 10, 2025

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1. Introduction

Commodity Futures Trading Commission ("Commission" or "CFTC") and the National Futures Association ("NFA") rules require each futures commission merchant ("FCM"), including Lime Trading Corp., ("Lime Trading" or the "Firm") to provide the following information to its customers prior to the time each such customer first enters into an account agreement with the Firm or deposits money or securities ("Funds").

Lime Trading is registered as an FCM with the CFTC and as a broker-dealer with the U.S. Securities and Exchange Commission ("SEC"). The Firm is also a member of FINRA and the NFA. The Firm is therefore required to abide by the rules of those regulators, in addition to applicable the Financial Industry Regulatory Authority ("FINRA") and NFA rules. The Firm was formerly known as Score Priority Corp. and changed its name to Lime Trading Corp. on February 25, 2022. Lime Trading is a subsidiary of F.H. Global Inc., which is the holding company for Lime Trading and its affiliates. This document focuses on the activities of Lime Trading. In addition to the information included in this document, pertinent information can be found on the Lime Trading Corp. website at [Lime.co](https://www.lime.co). A copy of this disclosure is available upon request.

Lime Trading is an agency-only, non-clearing FCM that provides execution services for customer transactions. The Firm's business primarily includes securities and futures brokerage for customers. Lime Trading does not employ brokers or advisors that manage customer accounts. All trading in a Lime Trading customer account is self-directed by the customer or by a third-party advisor. Lime Trading personnel are specifically prohibited from providing investment recommendations or advice including, but not limited to, investment, trading, or tax advice. Orders are entered by the customer and transmitted to the Firm electronically over the Internet for routing to exchanges and clearing brokers.

Lime Trading provides its customers with tools to facilitate its customers' management of their accounts. These tools are designed to allow customers to understand and manage their trading risks. Lime Trading's risk management tools and policies help Lime Trading protect the Firm and its customers.

Lime Trading is regulated by U.S. federal and state regulators, multiple exchanges, and self-regulatory organizations ("SROs"). As a CFTC registered FCM, Lime Trading is subject to the Commodity Exchange Act and rules promulgated by the CFTC, and is a member of the NFA. As a registered broker-dealer, Lime Trading is subject to the Securities Exchange Act of 1934 (the "Exchange Act") and the rules promulgated thereunder and by the SEC, FINRA and other SROs and exchanges of which the Firm is a member.

Except as otherwise noted below, the information set out is as of October 6, 2025. Lime Trading will update this information at least annually and as necessary to reflect any material change to its business operations, financial condition, or other factors that may be material to a customer's decision to do business with the Firm. Please note that Lime Trading's business activities and financial data are not static and may change throughout any 12-month period.

2. Lime Trading Corp. name, address, phone number, fax number, and email address

Lime Trading Corp.

Headquarters located at:
450 7th Avenue, 31st Floor
New York, NY 10123

Phone: 646 558-3232

Website: www.lime.co

Inquiries may be directed to: futures@lime.co

3. The name, title, business address, business background, areas of responsibility, and nature of duties of each principal of Lime Trading Corp.

The following is a list of principals of the Firm registered with the NFA. For each, we have included a summary of the individual's background and details concerning their responsibilities.

Eva Sehic – Chief Executive Officer

Ms. Sehic has more than 20 years of leadership experience in firms covering most asset classes. Ms. Sehic started her career in asset management at Goldman Sachs in the FICC portfolio management team and later joined Deutsche Bank, driving the success of mission-critical business operations and client coverage teams in derivatives and securities through complex and challenging times for the financial industry. More recently Ms. Sehic served as CEO of Sber CIB USA, a US registered broker dealer. She demonstrates proven strengths in cost containment, operational efficiency, collaborative strategy development, enterprise-wide implementation, and crisis management. Ms. Sehic is known for building high-performing and sustainable teams, developing accurate target business models as well as for crisis management. Ms. Sehic also maintains the following securities registrations: Series 7, 24, 63 and 99. As CEO, Eva holds certain dual responsibilities. In addition to Board membership, whose responsibilities involve board-level oversight, review and approval and general strategic direction of the Firm, she is also an executive officer with authority to commit the firm to customer or counterparty agreements or transactions, authorize the opening and maintenance of banking and clearing arrangements, and sign certain regulatory and financial filings.

Johan Sandblom – President

Mr. Sandblom, has more than 20 years of experience with financial services firms. Prior to joining Lime Trading, Mr. Sandblom held positions at Lime Brokerage and served as Head of U.S. Execution for Neonet Securities Inc. Mr. Sandblom received his BA degree in Marketing, an MBA in Finance, and an MSIS degree from Hawaii Pacific University in Honolulu. Mr. Sandblom holds Series 3, 4, 7, 24, 55, 63 licenses. As a member of the Board of Directors, he is not involved in the daily business operations of the FCM and his responsibilities are limited to board-level oversight, review and approval and general strategic direction of the Firm.

Michael Levy – Chief Financial Officer

Mr. Levy has more than 20 years of experience in financial services leadership. He has guided companies such as Lazard, Sber CIB USA and more recently BMO Harris through strategic decision-making and sustainable growth. Mr. Levy has extensive expertise in finance and accounting and has excelled as CFO, overseeing budgeting, forecasting, and financial analysis for both large established firms and smaller broker-dealers in both clearing and non-clearing capacities. He is a Certified Public Accountant (CPA) and a Certified Money Laundering Specialist. He currently maintains the following securities registrations: Series 7, 24, 27, 63 and 99. As CFO, Michael oversees the Firm's accounting, capital and regulatory reporting functions, and monitors financial condition and liquidity of the Firm. He prepares financial statements and CFTC/NFA filings and works with senior management and the CCO to ensure accurate and timely reporting.

Ellina Emelianova – Head of Risk Management

Ms. Emelianova possesses more than 19 years of experience in the financial industry and is currently the Head of Risk Management at Lime Trading Corp. Prior to this role, she served as Risk Manager at Freedom Holding Corp. in Las Vegas, NV and Freedom Finance Europe Ltd. in Limassol, Cyprus. She has also held significant positions such as Managing Director at VTB Bank (PJSC) Ltd., Executive Director at Sberbank PJSC, and Head of the Stress Testing Department at the Central Bank in Eastern Europe. Ms. Emelianova is currently pursuing a master's degree in business analytics at the University of Massachusetts, Amherst. She has enhanced her professional skills through programs at MIT and Lomonosov Moscow State University. Ms. Emelianova holds a PhD in Economics and a combined bachelor's and master's degree in mathematical economics with honors. As the Head of Risk Management, Ellina oversees the Firm's Risk Management Program and related controls. Her role includes identifying, monitoring and reporting material risks across financial, operational and compliance areas. She evaluates key risk exposures and coordinates with senior management and the Futures CCO on risk mitigation.

Bruce Kolman – Futures Chief Compliance Officer

Mr. Kolman has more than 25 years of experience in the financial services industry. Prior to joining Lime Trading, he served as Chief Compliance Officer for OANDA Corporation, as Futures Chief Compliance Officer for Apex Clearing Corporation and held compliance positions at TD Ameritrade Futures & Forex LLC. He was a member of the CME Group for many years, acting as a futures options market maker and as a partner in proprietary trading groups. Mr. Kolman is an attorney registered with the state of Illinois and is also a member of the National Futures Association. He received a JD from the DePaul University College of Law and a BA from St. Johns College. As Futures CCO, Bruce oversees the Firm's compliance program, including supervisory procedures, regulatory filings and adherence to CFTC and NFA requirements. He monitors and tests compliance controls, provides training, and coordinates with senior management and the CFO to ensure timely reporting and resolution of regulatory matters.

Lubomir Kaneti – Head of Business Development - Futures

Lubomir Kaneti serves as the Lime Trading Corp., Head of Business Development – Futures. Lubomir is an experienced financial executive with a strong background in business development, sales, and marketing within the futures, FX and derivatives industries. He has over 20 years' experience in the financial services industry. Prior to his current role, Mr. Kaneti served as CEO at SparkMarkets

Inc, where he focused on SAAS Trading Technology and Services. His career also includes significant leadership positions such as Chief Commercial Officer at Trading.com US, Senior Managing Director at CX Futures Exchange (a subsidiary of Cantor Fitzgerald), and Chief Operating Officer at FXDD, a retail foreign exchange and derivatives broker. As Head of Business Development – Futures, Lubo is responsible for managing the Firm's client acquisition and relationship activities. The role includes developing customer relationships and supporting growth within approved risk parameters. He works with senior management to ensure all development activities comply with CFTC and NFA requirements.

The business address for all of Lime Trading's principals listed above is 450 Seventh Avenue, 31st Floor, New York, NY 10123.

Other Principals of the Company

Individuals and entities, set forth below, are listed as principals of Lime Trading Corp. in accordance with CFTC Rule 3.1, solely because they directly or indirectly control an ownership interest of ten percent or more in the Company or because they have directly or indirectly contributed ten percent or more of the capital of the Company. These individuals and entities are not deemed material for the purposes of this disclosure document because they do not participate in the management of the Firm.

FH Global Inc – 100% owner of Lime Trading Corp. - Equity owner with no active management role.

Victor Remsha – 100% owner of FH Global Inc. – Equity owner with no active management role.

4. The significant types of business activities and product lines engaged in by Lime Trading Corp., and the approximate percentage of the assets and capital that are used by the Firm in each type of activity

Lime is an electronic agency brokerage firm. Lime Trading's customers are primarily obtained through the Firm's website at. Customers have access to trade in most domestic futures markets and certain international markets. The Firm does not manage any customer accounts and does not engage in any proprietary trading and maintains customer positions and balances on an omnibus basis at Straits Financial LLC, and at Advantage Futures LLC, its clearing FCMs.

The table below shows Lime Trading's primary business activities and the approximate percentage of its assets and capital that are used in each type of activity as of October 10, 2025 Lime Trading's primary business line is conducting securities transactions for its customers.

Activity/Product Line	Percentage of Allowable Assets	Percentage of Capital
Securities Brokerage	99%	91%
Futures Brokerage	1%	9%

Lime Trading holds its customer positions and funds on an omnibus basis at its clearing FCM. As a non-clearing FCM, Lime Trading acts as an intermediary to facilitate trades for its customers. The omnibus account structure enables Lime Trading to offer futures trading to its customers without having direct access to clearinghouses. Lime Trading relies on its clearing FCM to manage the clearing and settlement of trades, aggregate account balances, and manage customer initial and variation margin on a consolidated basis. This arrangement places an operational responsibility on Lime Trading to maintain accurate records and manage funds and positions at both the aggregate and individual account levels.

Omnibus Account Structure

Lime Trading maintains a single account at its clearing FCM that consolidates all its customer positions and funds instead of maintaining individual accounts for each customer. All customer trades, positions, and margin balances from Lime Trading customers are grouped together in this account and the clearing FCM clears only the aggregate activity and margin requirements for Lime Trading's customers and not the individual details of each customer account.

Fund Collection and Management

Lime Trading collects funds from customers, including the required margin funds and any additional variation margin for covering daily gains or losses based on market movements of the futures positions in the omnibus account. Lime Trading holds customer funds in a segregated bank account to comply with regulatory requirements for customer protection. When the clearing FCM requires an

additional margin based on the net exposure of the omnibus account, Lime Trading meets this requirement by transferring funds from its segregated account to the clearing FCM.

Trade and Position Management

All trades executed on behalf of Lime Trading's customers are consolidated in the omnibus account. The clearing FCM sees only the net position in the omnibus account rather than each individual customer's trades. Lime Trading maintains its own internal records to track each individual customer's funds, positions, profit and loss, and margin obligations. This internal tracking is crucial for ensuring that Lime Trading accurately manages individual customer balances and positions, meets customer withdrawal requests, and tracks assets in each separate customer account.

Margin and Daily Settlements

The clearing FCM assesses the total margin requirement and daily variation margin for the overall positions held in the omnibus account. If the positions show a net loss for the day, the clearing FCM issues a margin call, which the Lime Trading covers from the funds collected from the applicable customer(s). Similarly, if there is a net gain in the Omnibus account, the clearing FCM credits funds to the Omnibus account and Lime Trading then passes these gains to the appropriate Lime Trading customer account. Lime Trading adjusts its customer accounts daily to reflect the individual P&L, margin obligations, and account balances, and allocates the gains and losses from the omnibus account at the clearing FCM to each applicable customer account.

Fees and Reporting

The clearing FCM charges clearing fees to Lime Trading for maintaining and managing the omnibus account. Lime Trading passes these costs on to its customers. Daily reports from the clearing FCM show the omnibus account's total exposure, margin requirements, and settlement details which Lime Trading uses to reconcile its customer accounts and verify compliance with futures regulations.

5. Lime Trading Corp.'s business on behalf of its customers, including types of customers, markets traded, international businesses, and clearinghouses and carrying brokers used, and Lime Trading Corp.'s policies and procedures concerning the choice of bank depositories, custodians, and counterparties to permit transactions under § 1.25

Types of Customers

As an electronic agency broker, Lime Trading routes orders for both institutional and individual customers. Lime Trading's systems provide its customers with the ability to monitor multiple markets and execute trades electronically in these markets in multiple products. Lime Trading's customers include individuals and legal entities. All of the Firm's customer positions and funds are consolidated into one account at the clearing FCM. This account represents the aggregate margin and funds of all customers of Lime Trading, rather than individual customer accounts at the clearing FCM. Customer funds associated with the omnibus account are held at the clearing FCM, which manages those customer funds according to regulatory requirements that such funds be kept segregated from the FCM's own operating funds. While the clearing FCM holds the omnibus account, Lime Trading, as the non-clearing FCM, maintains detailed records of each individual customer's funds and positions. This enables Lime Trading to manage and report on each customer's positions and ensure compliance with regulatory requirements for customer fund protection.

Markets Traded

Lime Trading provides customers access to trade futures and futures-options trading on exchanges operated by CME Group, ICE Futures US, ICE Futures Europe, and Eurex.

As of the date of this document, the Firm has not traded any cleared swap contracts, over-the-counter foreign exchange transactions, nor does it anticipate including offering these as part of its business in the near future.

Clearinghouses

Lime Trading is not a member of the clearinghouses. Its clearing FCMs hold applicable memberships. CME Clearing, a division of Chicago Mercantile Exchange Inc., is the clearinghouse for all trades executed on CME, CBOT, COMEX, and NYMEX. The clearinghouse for trades executed on ICE is ICE Clear US Inc. ICE Futures Europe clears its transaction on ICE Clear Europe. The Eurex Exchange uses Eurex Clearing AG as its clearing house.

International Business

Lime Trading generally targets U.S.-based clients but, certain retail or institutional clients outside the U.S. could engage Lime Trading for access to U.S. market, if they meet certain regulatory requirements. Lime Trading has a relationship with an international financial services company that offers brokerage and trading services specifically to non-U.S. citizens.

Carrying Brokers

Lime Trading is not a member of any futures exchanges. The Firm has entered into clearing agreements with Straits Financial LLC and Advantage Futures LLC ("clearing members"), both based in Chicago IL, which are clearing members on major commodity exchanges. Lime Trading's clearing arrangements are on an omnibus basis and through the clearing members, which hold customer futures positions, cash deposits, or other customer collateral related to customer futures trading.

Counterparties

Lime Trading conducts a credit analysis on its counterparties (including banks through which the Firm deposits/invests funds, under CFTC and SEC rules) before establishing a counterparty relationship. The Firm evaluates the risks of the bank's balance sheet, financial performance over a period, credit ratings and pending litigations/regulatory investigations and takes into account the nature of the counterparty relationship. These reviews are updated at least annually. The Firm also performs quarterly reviews of its counterparty banks to help ensure that banks that have been selected remain a good credit risk.

6. *The material risks, accompanied by an explanation of how such risks may be material to its customers, of entrusting funds to the futures commission merchant, including, without limitation, the nature of investments made by the futures commission merchant (including credit quality, weighted average maturity, and weighted average coupon); the futures commission merchant's creditworthiness, leverage, capital, liquidity, principal liabilities, balance sheet leverage and other lines of business; risks to the futures commission merchant created by its affiliates and their activities, including investment of customer funds in an affiliated entity; and any significant liabilities, contingent or otherwise, and material commitments*

Material Risks

Lime Trading operates as a futures commission merchant business for its customers as a non-clearing FCM and does not engage in proprietary trading. The Company may have amounts due from clearing brokers. To mitigate that risk, management has evaluated the credit worthiness of these entities. As a result, management believes the Company is not exposed to significant risk on receivables from these entities.

The Firm's business activities involve the execution of customers' futures, options and securities transactions with exchanges and brokers. These activities may expose Lime Trading to risk in the event certain customers or clearing brokers are unable to fulfill their contractual obligations. The Firm seeks to manage the risks associated with its activities by requiring customers to maintain margin collateral in compliance with various regulatory and internal guidelines and by dealing with brokers who are subject to CFTC or Securities Exchange Commission financial requirements.

The Firm monitors customer trading and if it finds that customers have become heavily concentrated in a particular contract or market sector, the Firm will perform stress testing to detect potential large trading losses. Lime Trading seeks to control heightened market risk in most cases by requiring customer to deposit funds that exceed exchange margin requirements and to add funds or reduce positions, when necessary to manage risk.

Risks to Customers

The risk of clients losing funds held by Lime Trading Corp—even in the event of insolvency of the Firm or its affiliates—is minimal due to the way these funds are custodied. Client deposits are maintained in segregated bank accounts with major U.S. financial institutions, in full compliance with applicable CFTC regulations. These accounts are designated exclusively for the benefit of customers, and banks holding such funds must provide written assurance that the funds cannot be used by the Firm for proprietary purposes, such as

securing credit or satisfying Firm obligations. Additional CFTC rules and internal policies further limit how these funds may be invested, allowing only certain approved instruments. Therefore, even in the unlikely case of insolvency, there is no material risk that clients would lose their deposited funds. Nonetheless, as future events cannot be predicted with certainty, some residual risk may remain. Although Lime Trading is registered as a broker-dealer and is a member of SIPC, it is important to understand that funds deposited with an FCM for trading futures and futures-options contracts on either US or foreign markets are not protected by the Securities Investor Protection Corporation (SIPC), even if the FCM is also registered with the Securities Exchange Commission as a broker-dealer.

Customers trading in 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 U.S. may not receive the same level of protection as Customer Segregated Funds held in the U.S. If the foreign broker carrying 30.7 customer positions becomes insolvent, 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 U.S. Bankruptcy Code. Return of 30.7 customer funds to the U.S. may be delayed and likely will be subject to the costs of administration of the insolvent foreign broker in accordance with the laws of the applicable jurisdiction, as well as possible other intervening foreign brokers, if multiple foreign brokers were used to process U.S. customer transactions on foreign markets.

The Nature of Investments

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.

Lime Trading mitigates the market, credit, counterparty, operational, and liquidity risks associated with its investments by adopting conservative standards when it comes to investing house funds and has monitoring procedures in place to confirm that it is meeting its regulatory capital requirements and has sufficient liquidity to meet its ongoing business obligations.

Lime Trading has house cash deposits and certain customer funds maintained at financial institutions which deposits may, at times, exceed the insured amounts protected by the U.S. Federal Deposit Insurance Corporation ("FDIC"). However, the Company has not experienced any losses in such accounts and management believes the Company is not exposed to significant risk to such cash deposits in major U.S. banks. In addition to deposits with highly rated regulated banks, the Firm has deposits with its clearing FCM.

Currently, all investments are limited to cash deposits. To mitigate the risk of loss, as described above, Lime Trading performs a thorough credit review in the selection of the banks it uses for deposits and investments. The Firm also performs quarterly reviews to ensure the banks that have been selected remain at a good credit risk.

Lime Trading currently holds substantially all its liquid assets in cash. Lime Trading limits market risk by maintaining a dollar-weighted average time-to-maturity of any securities positions in its portfolio that does not exceed 24 months. In addition, Lime Trading does not invest in agency securities (e.g., securities issued by Freddie Mac or Fannie Mae) or in debt obligations of foreign governments.

Depending upon prevailing interest rates, the Firm may, in the future, invest a portion of its own funds in instruments that meet the investment criteria set forth in CFTC Rule 1.25.

Creditworthiness

Lime Trading is a privately held company and has not received a credit rating from any of the nationally recognized statistical rating organizations.

Leverage

Lime Trading does not extend leverage (margin financing) to its futures customers.

Capital

The purpose of Lime Trading's capital requirement is to help assure that the Firm has sufficient capital to protect customers in the event of a default of one or more customers, adverse market conditions, or for any other reason. As of August 31, 2025, Lime Trading had adjusted net capital of \$12,321,328 and excess net capital of \$11,321,328.

The Firm's capital contributions are relied upon solely from its parent company FH Global Inc. Accordingly, the Firm carefully monitors its adjusted net capital to ensure compliance with CFTC minimum net capital requirements and provide sufficient notification to FH Global that the FCM requires additional capital infusion.

Liquidity

The Firm maintains sufficient levels of cash on hand to allow for a buffer should an immediate need arise for available funds. The Firm's liquidity needs are reassessed frequently and revised as needed. Its current business model is to introduce its customers to a clearing broker that will clear and carry customer accounts. On August 31, 2025, Lime Trading's assets totaled \$20,046,262 and, of that, \$16,320,179 are considered current assets per CFTC regulations. It is the Firm's policy to limit investment of house funds to bank deposits which are highly liquid. Its current business model is to introduce its customers to a clearing broker that will clear and carry customer accounts. As part of its annual risk management review, the RMU reviews the firm's liquidity management plan and reports its findings to senior management.

Principal Liabilities

The Company is obligated under a non-cancelable operating lease for its corporate headquarters that expires on November 30th, 2026. The Company is obligated under a non-cancelable operating lease for its new corporate headquarters commencing in September 2025 which expires on January 31, 2033. The following table is a schedule of minimum lease payments required under the non-cancelable operating lease for the years ending December 31, 2025, through January 2033:

2025	\$	236,151
2026		505,671
2027		323,135
2028		331,213
2029		339,493
Thereafter		1,142,477
	\$	<u>2,878,141</u>

Balance Sheet Leverage

On a monthly basis, Lime Trading is required to report to the NFA and CFTC a leverage ratio calculation performed in accordance with U.S. Generally Accepted Accounting Principles ("GAAP"). Section 16(e)(3) of the NFA's Financial Requirements defines leverage as the total balance sheet assets, less any instruments guaranteed by the U.S. government and held as an asset or to collateralize an asset divided by total capital (the sum of stockholder's equity and subordinated debt).

Leverage ratios can provide essential information on a firm's financial risk. A high leverage ratio means that the company is using debt and other liabilities to finance its assets, and all else being equal, is riskier than a company with lower leverage. The Firm's leverage ratio is provided pursuant to CFTC 1.55(k)(5). As of August 31, 2025, the Firm's balance sheet leverage ratio was 1.23. As an SEC registered broker-dealer, the Firm is subject to the SEC Uniform Net Capital Rule ("Rule 15c3-1"). Accordingly, the Firm is required to maintain a minimum level of net capital as defined (\$250,000) and requires that the ratio of aggregate indebtedness to net capital, as both defined, shall not exceed 15 to 1. The Company is also subject to the net capital requirements under Regulation 1.17 of the Commodity Exchange Act. On August 31, 2025, the Company's ratio of aggregate indebtedness to net capital was 0.2774 to 1.

Other Lines of Business

Lime Trading operates a futures commission merchant business and an SEC-registered agency broker business. The Firm does not manage customer accounts, does not provide recommendations or advice, does not make markets, or engage in proprietary trading.

Risk From Affiliates

As part of its Risk Management Program, Lime Trading has established a Risk Management Unit ("RMU") comprised of various officers and directors of the Firm to, among other things, verifies that the risk policies and procedures that make up Lime Trading's Risk Management Program are sufficient to identify, measure, monitor and mitigate the Firm's risk including the material risks from affiliates.

Lime Trading does not invest customer or house funds with affiliated entities. In addition, Lime Trading has no material risk from its affiliates (entities under common control, including parent companies, sister companies, or subsidiaries) as it has no Intercompany loans or advances, guarantees or commitments, payables or shared services, lease or property obligations, or tax liabilities (payables resulting from consolidated tax filings or tax-sharing agreements with a parent or affiliated entity.)

Significant Liabilities, Contingent or Otherwise, and Material Commitments

The Firm's material commitments consist primarily of lease obligations for office space. Please see the section above which discloses "Principal Liabilities" for further information.

In the normal course of business, the Firm's activities involve the execution of customers' futures, options and securities transactions with exchanges and brokers. These activities may expose the Firm to risk in the event the customers, or clearing brokers are unable to fulfill their contracted obligations.

The Firm seeks to control the risks associated with its activities by requiring customers to maintain margin collateral in compliance with various regulatory and internal guidelines and by dealing with brokers who are subject to CFTC or Securities Exchange Commission financial requirements. The Firm monitors required margin levels and, pursuant to such guidelines, requires customers and noncustomers to deposit additional funds, or reduce positions, when necessary. Currently, with respect to the Firm's broker-dealer activities, any collateral is custodied by the Firm's clearing counterparties.

Third-Party Vendor Risk

The Firm depends on several third-party vendors and service providers to carry out key operational tasks, including order routing, risk management, and back-office recordkeeping. These relationships are considered a significant operational risk under the Firm's Risk Management Program.

The Firm conducts appropriate due diligence on its third-party vendor relationships to the extent feasible. However, as these vendors operate independently, their actions are generally beyond the Firm's direct control, and therefore, the Firm cannot ensure that their services are entirely free of risk. The Firm endeavors, where possible, to include contractual provisions addressing system availability and business continuity; however, such provisions may not be present in all vendor agreements.

Because the Firm does not directly control vendor operations, a failure or disruption at a vendor could impair the Firm's ability to accept, execute or clear customer trades. In such cases, customers may experience delays in accessing account information, executing orders or withdrawing funds. The Firm conducts due diligence on its critical vendors and requests, at least annually, information regarding their business continuity testing. Nonetheless, there can be no assurance that vendors will be able to perform without disruption. Customer should be aware the reliance on vendors introduces risks outside of the Firm's immediate control, which could negatively impact their trading activities.

7. Lime Trading's designated self-regulatory organization, its website address, and the location where the annual audited financial statements of the futures commission merchant are available

Lime Trading is a non-clearing CFTC registered Futures Commission Merchant and for its futures business the NFA is the Firm's designated self-regulatory authority (DSRO). Lime Trading is not a member of any futures exchanges or futures clearing houses. Financial information including the Firm's Annual Statement of Financial Condition, as well as other required disclosures, are posted on the Firm's website at: <https://lime.co/disclosures>.

Financial information regarding Lime Trading, including its FCM Capital Data Report (Updated Monthly) can also be obtained from the [NFA Basic System](#). In addition, the CFTC website provides financial information for all FCMs.

8. Any material administrative, civil, enforcement, or criminal complaints or actions filed against Lime Trading where such complaints or actions have not been concluded, and any enforcement complaints or actions filed against Lime Trading during the past three years

On November 30, 2023, NFA's Business Conduct Committee (BCC) issued a Complaint against Lime Trading. The Complaint charges Lime Trading with failing to file timely daily segregation reports, segregated investment detail reports, monthly financial reports, and required notifications with NFA. The Complaint also charged Lime Trading with failing to supervise. On February 6, 2024, The NFA Business Conduct Committee accepted Lime Trading's settlement offer. In making the offer, Lime Trading stipulated and agreed to

cease and desist from violating NFA financial requirements sections 1(e) and 16(e), and NFA compliance rule 2-9(a) and paid a fine of \$100,000 and also acknowledged that settlement would include findings that Lime Trading violated requirements NFA financial requirements sections 1(e) and 16(e), and NFA compliance rule 2-9(a).

On May 28, 2024, the Company entered into a Letter of Acceptance, Waiver, and Consent (AWC) with NYSE Arca, Inc. that took effect on June 10, 2024. The AWC related to SEC Rule 15c3-5 or the Market Access Rule, and alleged that during the period between November 2, 2021 and May 28, 2024, Lime Trading (f/k/a Score Priority Corp.) violated Securities Exchange Act Rule 15c3-5(b), Rule 15c3-5(c)(1)(i), Rule 15c3-5(c)(1)(ii), Rule 15c3-5(d), and Rule 15c3-5(e)(1) by failing to establish, document, and maintain a system of risk management controls and supervisory procedures reasonably designed to manage the financial and regulatory risks of its business activities, related to credit limits, erroneous order controls, direct and exclusive control over credit limits, annual reviews, and NYSE Arca Rule 11.18(b) and (c) by failing to establish and maintain a supervisory system and written supervisory procedures reasonably designed to ensure compliance with Rule 15c3-5. Lime neither admitted nor denied the allegations. Lime consented to a censure and a fine of \$85,000.

9. A basic overview of Lime Trading's customer fund segregation, futures commission merchant collateral management and investments, futures commission merchants, and joint futures commission merchant/broker dealers

Lime Trading does not hold securities or other collateral for futures customers. Customer funds are deposited with the Firm's clearing FCM and may also be held by Lime Trading in segregated bank accounts in accordance with CFTC and NFA regulations.

Lime Trading prepares daily segregation, secured amount and cleared swaps customer collateral computations as of the close of business by noon of the following day as required by CFTC Regulations 1.32, 30.7(l) and 22.2(g); and NFA Compliance Rule 2-10. 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 U.S. are held in a Customer Segregated Account in accordance with CFTC 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.

Lime Trading maintains written policies and procedures that establish a target amount (either by percentage or dollars) that Lime Trading seeks to maintain as its residual interest in its customer segregated, customer secured, and cleared swaps customer collateral accounts, which are designed to reasonably ensure the FCM maintains these amounts and remains in compliance with the segregation, secured amount and cleared swaps customer collateral amounts at all times as required by CFTC Regulations 1.11 and 1.20 and NFA Financial Requirements Section 16(a).

All procedures or material changes to procedures relating to the protection of customer segregated funds are approved in writing by the Lime Trading Board of Directors as required by NFA Financial Requirements Section 16(a).

In the event that Lime Trading does not hold sufficient funds to meet its target residual amount in customer segregated accounts Lime Trading will file immediate notice with the CFTC and the NFA as required by NFA Interpretive Notice ¶9066 and CFTC Regulation 1.12(j).

Lime Trading will not make any withdrawal, transfer or disbursement, that is not made for the benefit of customers from any customer segregated funds account that exceeds 25% of Lime Trading's residual interest unless such withdrawal meets the requirements of NFA Financial Requirements Section 16(b), (c) and (d).

Customer Accounts. FCMs may maintain up to three 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
- (iii) a Cleared Swaps Customer Account for customers trading swaps that are cleared on a derivatives clearing organization (DCO) registered with the Commission. As of the date of this document, LIME has not traded any cleared swap contracts, nor does it anticipate trading cleared swaps.

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 any 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.

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.

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 a 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.

Cleared Swaps Customer Account. Funds deposited with an FCM or otherwise required to be held for the benefit of customers, to margin swaps cleared through a registered DCO, (i.e., Cleared Swaps Customer Collateral), are held in a Cleared Swaps Customer Account in accordance with the provisions of section 4d(f) of the Act and Part 22 of the Commission's rules. Cleared Swaps Customer Accounts are sometimes referred to as LSOC Accounts. LSOC is an acronym for "legally separated, operationally commingled." Funds required to be held in a Cleared Swaps Customer Account 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 of the US that has in excess of \$1 billion of regulatory

capital; (iii) a DCO; or (iv) another FCM. 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 Cleared Swaps Customers.

Additional information regarding the protection of customer funds is available in the Futures Industry Association's "Protection of Customer Funds Frequently Asked Questions" located at <https://fia.org/articles/protection-customer-funds-frequently-asked-questions>.

10. How a customer can file a complaint about Lime Trading with the Commission or with the Firm's designated self-regulatory organization

A customer can file a complaint about Lime Trading or one of its employees with the CFTC or with the Firm's designated self-regulatory organization by contacting the commission staff electronically at <https://forms.cftc.gov/Forms/Complaint> or by calling the CFTC staff at 202.418.5000 or by writing to:

CFTC Headquarters
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

A customer that wishes to file a complaint about Lime Trading with the National Futures Association may do so electronically at <http://www.nfa.futures.org/basicnet/Complaint.aspx> or by calling NFA directly at 800-621-3570.

11. Lime Trading's financial data as of the most recent month-end when the document was prepared

(i) Lime Trading's total equity, regulatory capital, and net worth, all computed in accordance with U.S. Generally Accepted Accounting Principles and § 1.17, as applicable.

The following unaudited data is as of August 31, 2025.

Total Ownership Equity	\$16,333,023
Tentative Net Capital	\$12,606,940
Adjusted Net Capital	\$12,321,328
Excess Net Capital	\$11,321,328

The 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 for a twelve-month period.

In addition, the NFA on a twice-monthly basis publishes 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., FCM's Residual Interest.

The report also shows the percentage of Customer Segregated Funds that are held in cash and each of the permitted investments under CFTC Regulation 1.25. The report also indicates whether the FCM held any Customer Segregated Funds during that month at a depository that is an affiliate of the FCM.

(ii) The dollar value of Lime Trading's proprietary margin requirements as a percentage of the aggregate margin requirement for futures customers, cleared swaps customers, and 30.7 customers.

The Firm has no proprietary margin requirements as it does not conduct proprietary trading. In addition, the Firm does not offer trading in cleared swaps.

(iii) The smallest number of Lime Trading's futures customers, cleared swaps customers, and 30.7 customers that comprise 50 percent of the futures commission merchant's total funds held for futures customers, cleared and 30.7 customers, respectively:

- Futures Customers: 1
- 30.7 Customers: 0
- N/A Cleared Swaps Customers: N/A

(iv) The aggregate notional value, by asset class, of all non-hedged, principal over-the-counter transactions into which Lime Trading has entered.

Not applicable as the Firm does not engage in any proprietary trading.

(v) The amount, generic source, and purpose of any committed unsecured lines of credit (or similar short-term funding) that Lime Trading has obtained but is not yet drawn upon.

The Firm does not have any committed unsecured lines of credit (or similar short-term funding) that it has obtained but is not yet drawn upon.

(vi) The aggregate amount of financing Lime Trading provides for customer transactions involving illiquid financial products for which it is difficult to obtain timely and accurate prices; and

The Firm does not extend margin financing to futures customers.

(vii) The percentage of futures customer, Cleared Swaps Customer, and 30.7 customer receivable balances that Lime Trading had to write off as uncollectable during the past 12-month period, as compared to the current balance of funds held for futures customers, cleared swaps customers, and 30.7 customers.

Lime Trading did not have any write-offs of customer receivable balances as uncollectable during the past 12-month period. The Firm does not offer trading in cleared swaps.

12. A summary of Lime Trading's current risk practices, controls, and procedures

Lime Trading has adopted a system of risk management policies and procedures designed to monitor and manage the risks associated with its activities as a futures commission merchant as well as a broker dealer. In accordance with the requirements of CFTC Rule 1.11, Lime Trading's Risk Management Program ("RMP") includes the establishment of a Risk Management Unit that is independent of the Firm's business unit. The RMU monitors and manages risk inherent in the business of a futures commission merchant including, but not limited to, market, credit, liquidity, foreign currency, legal, operational, settlement, segregation, technological and capital risk.

As with any risk management program, the Firm cannot eliminate all risk. However, the Risk Management Program establishes an overall framework to assess, monitor, and manage risks across categories such as market, credit, liquidity, and operational. It defines Risk Tolerance Limits aligned with the Firm's overall risk appetite. These limits are based on internal assessments and reflect the Firm's scale and business complexity. The RMU monitors adherence, identifies breaches, and escalates them as appropriate. Exceptions to risk limits require written justification and RMU approval.

The Risk Management Unit provides quarterly Risk Exposure Reports to senior management of the Firm, including to Lime Trading's CFO. Copies of these reports are filed with CFTC. The Risk Management Program is reviewed and evaluated annually by qualified internal audit staff or by a qualified third-party compliance service. As part of the review, the RMU reviews and approves the Firm's risk tolerance limits. Lime Trading's business practices are designed to manage and control the risks of its business and to its customers. Lime Trading maintains capital significantly more than minimum regulatory requirements, and all its capital is in cash or liquid investments. Customers are required to have sufficient funds available in their accounts prior to placing orders on their order management system. The Lime Trading RMU conducts credit assessments of all counterparties, including banks where the Firm's funds are maintained. The evaluation is performed using an internal scoring framework that incorporates financial metrics, such as capital adequacy, liquidity, profitability; qualitative factors, including credit history, transparency, and business relevance; and indicators of default probability. Based on this analysis, each counterparty receives a composite score and is classified into a risk category: Strong, Moderate, or Weak. The Firm sets appropriate exposure levels according to the assessed risk and conducts reviews at least annually or in response to material changes in a counterparty's condition.

The Firm conducts annual reviews to monitor for any material changes to the existing policies and procedures.