

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

Updated: July 23, 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://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 June 30, 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:

One Penn Plaza  
New York, NY 10119

Phone: 646 558-3232

Website: [www.lime.co](https://www.lime.co)

Inquiries may be directed to: [futures@lime.co](mailto: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.

#### **Johan Sandblom – President**

Mr. Sandblom, Chief Executive Officer of Lime Trading Corp., 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.

#### **Evgeny Kuteev – Head of Product Development and Strategy**

Mr. Kuteev has more than 25 years of experience in derivative brokerage development and operations. He has held key roles in establishing multiple international brokerages. Mr. Kuteev earned a Master of Science degree in Applied Mathematics from Moscow Aviation University and holds a Series 3 license.

#### **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.

#### **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.

#### **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.

#### **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.

The business address for all of Lime Trading's principals listed above is 1 Penn Plaza, Suite 1614, New York, NY 10119.

#### *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 [www.lime.co](http://www.lime.co). 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 June 30, 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.

#### **Fund Collection and Management**

Lime Trading collects funds from customers, including the required margin funds and any additional variation margin. 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. Lime Trading maintains its own internal records to track each individual customer's funds, positions, profit and loss, and margin obligations.

#### **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. 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. Daily reports from the clearing FCM show the omnibus account's total exposure, margin requirements, and settlement details.

*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.

### **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. markets.

### **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.

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 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.

### **Risks to Customers**

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.

### **The Nature of Investments**

Lime Trading mitigates the market, credit, counterparty, operational, and liquidity risks associated with its investments by adopting conservative standards when it comes to investing its own 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 currently holds substantially all its liquid assets in cash.

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 June 30th, 2025, Lime Trading had adjusted net capital of \$12,017,959 and excess net capital of \$11,017,959.

### 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.

### 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 a move to new corporate headquarters commencing in the late third quarter or early fourth quarter of 2025, expiring sometime in 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 2033:

2025	\$	340,367
2026	\$	531,725
2027	\$	322,735
2028	\$	330,413
2029	\$	339,493
Thereafter	\$	1,369,532
	\$	<u>3,234,266</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 June 30, 2025 the Firm's balance sheet leverage ratio was 1.25. The Firm is also subject to the net capital requirements under Regulation 1.17 of the Commodity Exchange Act. On June 30th, 2025, the Firm's ratio of aggregate indebtedness to net capital was 0.3207 to 1.

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.

### 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

The Firm monitors and manages risks arising from its affiliates, which may impact Lime Trading Corp.

## 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.

***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 June 30<sup>th</sup>, 2025.

Total Ownership Equity	\$16,403,702
Tentative Net Capital	\$12,305,312
Adjusted Net Capital	\$12,017,959
Excess Net Capital	\$11,017,959

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 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.