SANTANDER US CAPITAL MARKETS LLC.

DISCLOSURE DOCUMENTS
REQUIRED UNDER
COMMODITY EXCHANGE ACT
REGULATION 1.55(k)

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October 28, 2026

INTRODUCTION

Regulation 1.55(k) of the Commodity Exchange Act ("CEA") requires each Futures Commission Merchant ("FCM"), including Santander US Capital Markets LLC. ("SanCap" or "the Firm"), to provide the information contained in this document to a customer prior to the time the customer enters into an account agreement or deposits money or securities ("funds") with the FCM.

SanCap is a registered broker-dealer with the Securities and Exchange Commission ("SEC") and a member of the Financial Industry Regulatory Authority, Inc. ("FINRA"). SanCap is also registered with the Commodity Futures Trading Commission ("CFTC") as a Futures Commission Merchant ("FCM") and is a member of the National Futures Association ("NFA"), the New York Stock Exchange LLC ("NYSE") and NYSE MKT LLC ("NYSE MKT"). SanCap is a clearing member of the Chicago Mercantile Exchange Inc. ("CME"), Chicago Board of Trade, Inc. ("CBOT"), New York Mercantile Exchange, Inc. ("NYMEX"), Commodity Exchange, Inc. ("COMEX"), Intercontinental Exchange US ("ICEUS") and Intercontinental Exchange Energy Division ("IFED") and Options Clearing Corporation ("OCC") for equity and index contracts. SanCap was designated as a Primary Dealer by the Federal Reserve Bank of New York ("FRBNY").

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The information provided in this document will be updated annually or earlier in the event of material changes to SanCap's business operations, financial condition, or other factors that SanCap believes may be material to a customer's decision to conduct business with SanCap.

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1. CEA Regulation 1.55 (k)(1) – FCM Name and Address

The futures commission merchant's name, address of its principal place of business, phone number, and email address.

Santander US Capital Markets LLC
437 Madison Ave, 6th Floor.
New York, NY 10022
Phone Number: 212-872-0100
Fax: Not available
(Refer to Contacts, below, for email addresses)

Contacts:

- **Joseph Norton Walsh III**, Chief Executive Officer (joseph.walsh@santander.us) (646-776-7800)
- **Isaac Antonio Prada Rua**, North America Head of Exchange Traded Derivatives (iprada@santander.us) (212-583-4605)
- **Gerardo Prieto Moreno**, SanCap Head Pre-Post Trade (gerardo.prieto@santander.us) (917-679-1178)
- **John Herbert Grefe III**, Chief Compliance Officer (john.grefe@santander.us) (212-350-0791)
- **Michael John Santangelo**, Chief Financial Officer (Michael.santangelo@santander.us) (646-776-7767)

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2. CEA Regulation 1.55 (k)(2) – Biographies

The name, title, business address, business background, areas of responsibility, and the nature of the duties of each person that is defined as a principal of the futures commission merchant pursuant to Regulation 3.1 of this chapter.

Joseph Norton Walsh III (437 Madison Ave, New York, NY 10022)

Joseph Walsh, Chief Executive Officer ("CEO") of SanCap, has more than 30 years of experience focused on the fixed income capital markets. He was the CEO of APS prior to the merger with SIS. As President of predecessor Firm Amherst Securities, Mr. Walsh managed the business and operations from 2009 until the merger with Pierpont in 2014. He previously served as a Managing Director in the private equity business at Fortress Investment Group specializing in financial institutions. Mr. Walsh also served for 9 years as a Managing Director and Head of Mortgage and Asset-Backed Origination, Finance and Trading at RBS Greenwich Capital. Mr. Walsh holds the series 7, 24, 79 and 99 licenses.

Isaac Antonio Prada (437 Madison Avenue, New York, NY 10022)

Isaac Prada is Head of SanCap's Exchange Traded Derivatives Division for European and US markets. Mr. Prada is responsible for monitoring SanCap's futures activities and ensuring that the activities comply with U.S. laws and regulations. Isaac's career at Santander spans across the U.S. and Spain. Prior to leading the Santander US team in 2010, Mr. Prada was employed by Santander Group located in Madrid where he served in various roles, including Global Head of Exchange Traded Derivatives Sales. Mr. Prada is Series 3, 30 registered and Branch manager registered with the National Futures and holds a BA in Economics from Saint Edwards University in Austin, Texas.

Gerardo Prieto-Moreno (200 Liberty Street, New York, NY 10281)

Gerardo Prieto-Moreno is the Head of Pre & Post Trade Markets for the Corporate and Investment Banking (CIB) division of Santander and the Chief Operating Officer ("COO") of SanCap. In his role, Mr. Prieto-Moreno is responsible for the Middle Office and Operations functions supporting the Markets activity across the three entities in which CIB USA operates (SanCap, NYB and Santander Bank NA). Prior to Mr. Prieto-Moreno's current role which he has held since February 2020, he served in various senior Operations management roles for the Santander Group located in Madrid for 16 years. His prior experience includes Head of Operations for CLS Bank in New York and London and several operational roles at JPMorgan Global Foreign Exchange in the UK. Mr. Prieto-Moreno holds a series 27 and 99 licenses.

John Grefe (437 Madison Avenue, New York, NY 10022)

John Grefe is the Chief Compliance Officer for Santander US Capital Markets LLC ("SanCap"). Mr. Grefe joined Santander in 2026 from Daiwa Capital Markets America Inc., where he served as Chief Compliance Officer for the firm's U.S. broker-dealer and Futures Commission Merchant. Mr. Grefe spent the previous ten years as Chief Compliance Officer at Lloyds Securities Inc. and Head of Corporate Compliance for Lloyds Bank North America.

Michael John Santangelo (437 Madison Ave, New York, NY 10022)

Michael Santangelo is the SanCap Chief Financial Officer ("CFO") and is responsible for managing the Firm's Finance group and liquidity. Mr. Santangelo is a Certified Public Accountant and registered as a Series 27 Financial and Operations Principal. Mr. Santangelo has over 30+ years of experience in the financial markets. Mr. Santangelo has extensive experience serving as a CFO of several Firms prior to

joining Amherst Pierpont Securities, including CFO of CRT Capital Group LLC, Swiss Re Capital Markets Corp. and Swiss Re Financial Products Inc. Mr. Santangelo started his career in public accounting with PwC in its audit and assurance group in NY auditing several large broker-dealers.

Santander Holdings USA, Inc.

SanCap is a direct, wholly owned subsidiary of Santander Capital Holdings LLC ("SCHL"). SCHL is a direct, wholly owned subsidiary of Santander Holdings USA, Inc. ("SHUSA"), and SanCap and SCHL's other subsidiaries are indirect, wholly-owned subsidiaries of SHUSA. SanCap is the institutional broker-dealer of Banco Santander S.A. ("BSSA") in the United States operating under Santander Corporate & Investment Banking ("SCIB") – the global division that supports corporate and institutional clients.

SanCap primary strengths and capabilities include Credit, Rates, Structured Products, Securities Financing, Debt & Equity Capital Markets, Exchange Traded Derivatives, and Cash Equities.

Santander Holdings USA, Inc. is headquartered at 75 State Street, Boston, MA 02109.

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3. CEA Regulation 1.55 (k)(3) – Business Activities; Percent of Assets/Capital Per Activity

The significant types of business activities and product lines engaged by SanCap and the approximate percentage of the futures commission merchant's assets and capital that are used in each type of activity.

SanCap provides futures and options execution and clearing services to BSSA on an undisclosed omnibus basis and to third party clients. The Firm also provides over-the-counter interest rate swaps ("OTC IRS") clearing services to BSSA and affiliates.

SanCap is a registered broker-dealer, registered FCM, and Primary Dealer with Equities Research, Sales and Trading, Fixed Income Strategy, Sales & Trading, Debt and Equity Capital Markets, Treasury, and securitized products. As a primary dealer, SanCap serves as a direct trading counterparty to the Federal Reserve Bank of New York.

The chart below summarizes the significant types of business activities/product lines in which SanCap is engaged, and the approximate percentage of the Firm's assets and capital used in each type of activity (all values are as of September 30, 2026).

Activity/Product Line	As a % of Total Assets	As a % of Capital
Securitization Products	49.5%	15.4%
Rates	18.9%	0.4%
Matched Book	17.1%	0.0%
Exchange Traded Derivatives	10.3%	14.1%
Fixed and All Other Assets	2.3%	37.7%
Credit	1.1%	1.5%
Convertible Bonds	0.3%	1.0%
Securitization	0.3%	6.2%
Equities	0.2%	1.4%
Excess Capital		22.3%
	100.0%	100.0%

4. CEA Regulation 1.55 (k)(4) – Client Activity Type; Policies for Depositories/Custodians

The futures commission merchant's business on behalf of its customers, including types of customers, markets traded, international businesses, and clearinghouses and carrying brokers used, and the futures commission merchant's policies and procedures concerning the choice of bank depositories, custodians, and counterparties to permitted transactions under CEA Regulation 1.25.

SanCap performs execution and clearing services for clients including BSSA on an undisclosed omnibus basis. SanCap target client base includes non-financial corporations and financial institutions within Santander's remit of commercial activity.

SanCap is a direct clearing member of CME, ICEUS and IFED exchanges and utilizes Banco Santander SA as a carrying broker to offer clients access to the following European exchanges:

Banco Santander SA

Derivatives Exchange	Jurisdiction	Primary regulator
MEFF	Spain	**CNMV — Comisión Nacional del Mercado de Valores**
Eurex Deutschland	Germany	**Hessian Ministry of Economics / Exchange Supervisory Authority; BaFin for relevant financial-market supervision**
ICE Futures Europe	UK	**FCA — Financial Conduct Authority**

Euronext derivatives — Paris, Amsterdam, Brussels, Lisbon	EU	Relevant national competent authorities — principally **AMF** (France), **AFM** (Netherlands), **FSMA** (Belgium), **CMVM** (Portugal)
Nasdaq Nordic derivatives markets	Nordics	Relevant national FSAs, principally **Finansinspektionen** in Sweden for Nasdaq Stockholm
IDEM / Italian derivatives market	Italy	**CONSOB**
Warsaw Stock Exchange derivatives	Poland	**KNF — Polish Financial Supervision Authority**

SanCap maintains customer segregated funds and residual interest accounts, by currency, at JPMorgan Chase Bank, N.A. SanCap also maintains a U.S. Dollar-denominated customer segregated account at BMO Harris Bank N.A. in connection with Nodal Exchange activity.

The Firm also maintains secured accounts with JPMorgan Chase Bank, London Branch. and its foreign carrying broker, BSSA. BMO Harris Bank N.A. serves as an approved custodian for the FCM's OTC interest rate swaps clearing activity for house business, as well as for Nodal Exchange activity.

These accounts are maintained separately from SanCap's general operating accounts and are designated for the applicable customer or regulatory purpose. SanCap proprietary funds are not deposited into customer segregated accounts except when necessary to increase the Firm's residual interest. Any such deposit requires approval from the Chief Financial Officer ("CFO") and/or the Financial and Operations Principal ("FINOP").

Similarly, funds may not be transferred from these accounts to other SanCap accounts except when permitted to reduce excess residual interest. Any such transfer requires approval from the CFO and/or FINOP.

The Firm does not currently have any customer funds invested.

SanCap's Credit Risk Department reviews all depositories and custodians according to the Santander Group policy for reviewing and approving custodians (any margin collected by SanCap related to its FCM and OTC business is deposited at a custodial bank). Consistent with Santander Group policy, the review includes a credit review of the proposed custodian following the Santander Group rating guidelines for financial institutions, approval of the potential exposure by the CIB Risk Forum for the exposure generated by the custodial activity of the counterparty, and approval by the Global Network Management Department ("GNM") of BSSA's Head Office. The custodian currently approved for the futures and options clearing activity of the FCM is JPMorgan Chase Bank for the purpose of depositing

the target residual interest amount of the Firm (in compliance with CEA Regulation 1.20(d), the appropriate letter is on file).

Additional custodians could be requested to diversify custodial risk, reduce costs, or to replace a custodian no longer deemed creditworthy. In such an instance, Credit Risk would review the rating of the proposed custodian and approve the potential risk via the CIB Risk Forum, GNM and the Credit Risk Committee(s) of Head Office.

GNM oversees the global exposure to custodians. Procedures established by GNM require it, in addition to the oversight of the rating review and Credit Risk approval, to coordinate all custodial approvals to ensure that selected custodians have the technical expertise to meet the needs of the business unit, that they segregate assets appropriately, that legal agreements are consistent, and that they avoid undue concentrations of exposure (which could occur if Santander units were to select custodians independently.

5. Regulation 1.55 (k)(5) – Material Risks

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.

The SanCap Material Risk Program ("MRP") establishes a comprehensive view of material risks for SanCap. The program incorporates a bottom-up exercise supplemented by a top-down (executive) view to create a material risk inventory. The material risk inventory is refreshed at least twice a year. The MRP provides timely, clear, and comprehensive reporting of material risks (including risks that may emerge under stressful conditions) to executive management and the Firm's Board of Managers ("Board"). Further, MRP's output has various applications, including risk appetite setting, strategic planning, and risk ownership and monitoring. Material risk inventory included herein are results of the MRP.

Risk Type	Risk Name	Risk Event Description
Compliance Risk	**Non-compliance with Broker Dealer Regulations**	Risk of regulatory fines as the result of having little to no compliance platform in place with respect to broker- dealer and futures commission merchant regulations. Additionally, non-compliance can result in individuals (not SanCap) being fined and/or sanctioned, if the Firm can substantiate that an appropriate governing policy / procedure was in place.
	Non-compliance with BSA/AML/OFAC	The failure to have an adequate control environment in place to comply with BSA/AML/OFAC regulatory requirements with regards to customer identification, due diligence, enhanced due diligence, beneficial ownership, suspicious activity monitoring, and employee training presents a material risk that could result in a negative financial impact due to regulatory fines or reduced client business opportunities and associated revenues.
Operational Risk	**Highly Manual Control Environment**	The manual processing environment leads to the risk of errors in the processing of information and transactions, that can result in operational risk loss and be a contributing factor to other risks such as internal fraud, external fraud and disruption in business.
	Vendor Risk	Risk of potential service disruptions, legal liability, negative impacts to business performance, financial and reputational risk, and potential regulatory enforcement because of the third-party's or fourth-party's actions.
	Operational Resilience and System Failures	Risk of potential losses due to system failures and business disruptions, such as those involving: (i) Technology Obsolescence; (ii) Incident and Event Management; and/or (iii) Change Management.
	Change Risk	Ineffective change management could result in implementation delays, data quality or integration issues, cybersecurity vulnerabilities, and failed adoption of new workflows by end-users.
	Internal Fraud	Risk of potential financial loss and reputational damage due to internal fraud as result of the unauthorized access to and/or misuse of material non-public information by an employee.
Strategic Risk	**Strategic Execution Risk**	Risk that the business model loses its ability to generate sustainable economic value due to changes in customer preferences, competitive dynamics, market conditions, distribution channels, or the broader operating environment.

	Political and Economic Instability	Risk of financial loss due to negative effects of global political and economic instability. Such risk has potential impact to the Firm's businesses, including but not limited to: (i) causing a significant drop in issuances volume; or (ii) government interventions and market volatility (with subsequent negative impacts on Markets activities).
Market Risk	**Trading Risk**	Market risk is defined as the possibility of experiencing trading losses under stress situations due to factors that affect the overall performance of the financial markets in which the Firm is involved. Sources of market risk can include recessions, political turmoil, and changes in interest rates, natural disasters, and terrorist attacks. SanCap takes risk as a principal in a broad range of fixed-income products, including residential and commercial mortgage-backed securities, asset-backed and other highly structured finance transactions, U.S. Treasuries, Federal agency debentures, investment grade corporate securities, repo finance and High Yield bonds.
Liquidity Risk	**Mortgage-Backed Securities ("MBS") Market Liquidity Risk given concentration.**	The risk that a portfolio position cannot be closed at the market price due to lack of market depth, a reduction in market breadth, or any other market disruption, generating a financial loss. SanCap holds positions on Agency and Non-Agency MBS (less liquid) and may be subject to financial losses if the market experience said constraints. The risk may be increased due to balance sheet concentrations.
	Decrease in Collateral Value	A decline in collateral value heightens the broker dealer's susceptibility to market volatility, as it may trigger margin calls, need for capital injections, and or/impair the entity's financial positions. In addition, a decrease in collateral value may lead to loss of liquidity and reputational damage. Cash sources include tangible equity which can be impaired because of markdowns, and cash uses include margin calls which can fluctuate based on market environment.
	Wholesale Funding Liquidity	Heavy reliance on funding sources (secured/unsecured) can heighten the broker dealer's vulnerability to systemic risks, and disturbances within the financial ecosystem that can spread through the entities' funding structure, triggering a liquidity crisis and exacerbating market volatility.
Reputational Risk	**Litigation Risk**	With continued growth in business activities and an increase in the number of offerings, there is an increased risk of failing to provide adequate disclosure which could lead to litigation against the Firm and thus incur costs from legal fees, fines and/or a settlement.

(i) the nature of investments made by FCM (including credit quality, weighted average maturity and weighted average coupon);

When the Firm invests customer funds, it is done in accordance with CEA Regulation 1.25(a) and 1.25(b) which require that funds be invested in high quality and liquid securities with a short-term duration. The Firm currently does not currently have any customer funds invested.

(ii) the futures commission merchant's creditworthiness, leverage, capital, liquidity, principal liabilities, balance sheet leverage and other lines of business;

Santander Holdings USA Inc., parent company of SanCap, has received a BBB+/A-2' long/short-term issuer credit ratings from S&P in August 2026. On September 30, 2026, leverage was low, as demonstrated by SanCap's 5% equity/assets ratio. Net capital on September 30, 2026, was 259% of the amount of net capital required. Liquidity was strong, with cash as 1% of assets and access to operating and subordinated loan facilities. At December 31, 2025, the Firm's Level 3 assets of $ 173,404,329 (Level 3 assets are financial assets and liabilities that are the most illiquid and hardest to value).

Capital risk is the risk of holding insufficient capital resources to meet minimum regulatory requirements set forth in CEA Regulation 1.17. SanCap's Accounting Department performs daily calculations of moment-to-moment net capital, including computation of the regulatory minimum net capital requirement, to ensure the Firm always maintains adequate capital levels.

SanCap does not engage in cleared swaps customer activity.

(iii) risks to the futures commission merchant created by its affiliates and their activities, including investment of customer funds in an affiliated entity;

The Firm's ultimate parent, BSSA, is a significant futures clearing counterparty for both house and client activity. SanCap requires BSSA to maintain balances in excess of the required amount, which effectively collateralizes its exposure to the Santander Group affiliate.

SanCap also provides OTC IRS clearing services to affiliates.

The firm does not invest customer funds with an affiliated entity.

(iv) any significant liabilities, contingent or otherwise, and material commitments.

SanCap's annual audited financial statements are available at the following link: https://www.santanderus.com/annual-SanCap-notices/ click on "Industry Links and Disclosures" tab.

6. Regulation 1.55 (k)(6) – Self Regulatory Information and FCM Financial Statements

The name of the futures commission merchant's designated self-regulatory organization and its website address and the location where the annual audited financial statements of the futures commission merchant is made available.

SanCap's designated self-regulatory organization is the New York Mercantile Exchange ("NYMEX") Inc. See CME's website at the following link: http://www.cmegroup.com.

SanCap's annual audited financial statements are available at the following link: https://www.santanderus.com/annual-SanCap-notices/ CFTC Disclosures"; click on "Industry Links and Disclosures" tab. Santander US Capital Markets LLC Industry Links and Disclosures - Santander US

7. Regulation 1.55 (k)(7) – Material Complaints and Actions

Any material administrative, civil, enforcement, or criminal complaints or actions filed against the FCM where such complaints or actions have not concluded, and any enforcement complaints or actions filed against the FCM during the last three years.

SanCap signed the FINRA Acceptance, Waiver, and Consent (AWC) letter on September 29, 2023, closing the FINRA Enforcement matter originating from FINRA's 2020 examination of the firm.

SanCap entered into separate Orders with the SEC on January 13, 2025 and with the CFTC on September 4, 2025 to settle a matter for violations of the recordkeeping provisions of the federal securities laws relating to electronic communications, and related supervisory failures.

A financial examination of SanCap by CME's Financial and Regulatory Surveillance Department identified exclusion of interest payable to customers and commissions receivable from customers from the Statement of Segregation Requirements and Funds in Segregation, which resulted in a $10.3 million overstatement of customer payable in the balance sheet and Segregation formula.

NFA/FCM related complaints for SanCap can be found at the following website: http://www.nfa.futures.org/basicnet/

FINRA-related complaints for SanCap can be found at the following website: http://brokercheck.finra.org

8. Regulation 1.55 (k)(8) – Overview of Fund Segregation, and Collateral Management

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

Customer Accounts. SanCap 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. Currently, SanCap does not clear swaps for customers and does not maintain such accounts.

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 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. For example, the Commission has issued orders authorizing ICE Clear Europe Limited, which is registered with the Commission as a DCO, and its FCM clearing members: (i) to hold in Cleared Swaps Customer Accounts Customer Funds used to margin both (a) Cleared Swaps and (b) foreign futures and foreign options traded on ICE Futures Europe, and to provide for portfolio margining of such Cleared Swaps and foreign futures and foreign options; and (ii) to hold in Customer Segregated Accounts Customer Funds used to margin both (c) futures and options on futures traded on ICE Futures US and (d) foreign futures and foreign options traded on ICE Futures Europe, and to provide for portfolio margining of such transactions.

Customer Segregated Account. Funds that customers deposit with SanCap, 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 SanCap, 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, SanCap's customers. Unless a customer provides instructions to the contrary, SanCap may hold Customer Segregated Funds only: (i) in the US; (ii) in a money center country [1] ; or (iii) in the country of origin of the currency.

[1] Money center countries mean Canada, France, Italy, Germany, Japan, and the United Kingdom.

SanCap must hold sufficient US dollars in the US to meet all US dollar obligations and sufficient funds in each other currency to meet obligations in such currency. Notwithstanding the foregoing, assets denominated in a currency may be held to meet obligations denominated in another currency (other than the US dollar) as follows: (i) US dollars may be held in the US or in money center countries to meet obligations denominated in any other currency; and (ii) funds in money center currencies [2] ; may be held in the US or in money center countries to meet obligations denominated in currencies other than the US dollar.

30.7 customer funds deposited with SanCap, 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 **Secured** or 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, SanCap'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 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 (*e.g.*, SanCap) 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

[2] Money center currencies mean the currency of any money center country and the Euro.

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 SanCap, 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.

Investment of Customer Funds. Section 4d(a)(2) of the CEA authorizes SanCap 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 SanCap to invest Cleared Swaps Customer Collateral in similar instruments.

Commission Regulation 1.25 allows SanCap 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 SanCap may retain all gains earned and is responsible for investment losses incurred in connection with the investment of Customer Funds. However, SanCap and customer may agree that SanCap will pay the customer interest on the funds deposited.

Permitted investments in accordance with Commission Regulation 1.25 include:

(i) Obligations of the United States and obligations fully guaranteed as to principal and interest by the United States (U.S. government securities);
(ii) General obligations of any State or of any political subFirm's division thereof (municipal securities);
(iii) Obligations of any United States government corporation or enterprise sponsored by the United States government (U.S. agency obligations) [3] ;
(iv) Certificates of deposit issued by a bank (certificates of deposit) as defined in section 3(a)(6) of the Securities Exchange Act of 1934, or a domestic branch of a foreign bank that carries deposits insured by the Federal Deposit Insurance Corporation;
(v) Commercial paper fully guaranteed as to principal and interest by the United States under the Temporary Liquidity Guarantee Program as administered by the Federal Deposit Insurance Corporation (commercial paper);
(vi) Corporate notes or bonds fully guaranteed as to principal and interest by the United States under the Temporary Liquidity Guarantee Program as administered by the Federal Deposit Insurance Corporation (corporate notes or bonds); and
(vii) Interests in money market mutual funds.

The duration of the securities in which an FCM invests Customer Funds cannot exceed, on average, two years. At this time, the firm does not have any customer funds invested.

An FCM may also engage in repurchase and reverse repurchase transactions with non-affiliated registered broker-dealers, provided such transactions are made on a delivery versus payment basis and involve only permitted investments. All funds or securities received in repurchase and reverse repurchase transactions with Customer Funds must be held in the appropriate Customer Account, i.e., Customer Segregated Account, 30.7 Account or Cleared Swaps Customer Account. Further, in accordance with the provisions of Commission Rule 1.25, all such funds or collateral must be received in the appropriate Customer Account on a delivery versus payment basis in immediately available funds [4].

No SIPC Protection. Although SanCap is a registered broker dealer, it is important to note that the Securities Investor Protection Corporation (SIPC) does not protect funds that you deposit with SanCap for trading futures and options on futures contracts for U.S. and foreign markets.

[3] Obligations issued by the Federal National Mortgage Association or the Federal Home Loan Mortgage Association are permitted only while these entities operate under the conservatorship or receivership of the Federal Housing Finance Authority with capital support from the United States.

[4] As discussed below, NFA publishes twice-monthly a report, which shows for each FCM, inter alia, the percentage of Customer Funds that are held in cash and each of the permitted investments under Commission Rule 1.25. The report also indicates whether the FCM held any Customer Funds during that month at a depository that is an affiliate of the FCM.

Further, Commission rules require SanCap to hold funds deposited to margin futures and options on futures contracts traded on US designated contract markets in Customer Segregated Accounts. Similarly, SanCap must hold funds deposited to margin cleared swaps and futures and options on futures contracts traded on foreign boards of trade in a Cleared Swaps Customer Account or a 30.7 Account, respectively. In computing its Customer Funds requirements under relevant Commission rules, SanCap may only consider those Customer Funds actually held in the applicable Customer Accounts and may not apply free funds in an account under identical ownership but of a different classification or account type (e.g., securities, Customer Segregated, 30.7) to an account's margin deficiency. In order to be used for margin purposes, the funds must actually transfer to the identically-owned under margined account.

For additional information on the protection of customer funds, please see the Futures Industry Association's "Protection of Customer Funds Frequently Asked Questions" located at https://www.fia.org/fia/articles/protection-customer-funds-frequently-asked-questions.

9. Regulation 1.55 (k)(9) – How to File a Complaint Against the FCM

Information on how a customer may obtain information regarding filing a complaint about the futures commission merchant with the Commission or with the Firm's designated self-regulatory organization.

The procedure for a customer to file a complaint about SanCap with the CFTC is located on the following website: http://www.cftc.gov/ConsumerProtection/FileaTiporComplaint/index.htm

The procedure for a customer to file a complaint about SanCap with CME, the Firm's designated self-regulatory organization, is found at the website http://www.cmegroup.com/market-regulation/file-complaint.html or by calling CME at 312-341-7970.

10. Regulation 1.55 (k)(10) – Relevant Financial Data as of September 30, 2026

(i) The futures commission merchant's total equity, regulatory capital, and net worth, all computed in accordance with U.S. Generally Accepted Accounting Principles and Regulation 1.17, as applicable.

SanCap's annual audited financial statements are available at the following link: https://www.santanderus.com/annual-SanCap-notices/

SanCap's net capital and FCM daily segregation information are available at the following links:

https://www.santanderus.com/daily-sancap-notices/

https://www.santanderus.com/monthly-sancap-notices/

SanCap's total equity, regulatory capital, and net worth as of the most recent month-end FOCUS II when the disclosure document is prepared:

Total Equity - $1,258,527,210
Regulatory Capital - $1,608,527,210
Net Worth - $1,258,527,210

(ii) The dollar value of the futures commission merchant's proprietary margin requirements as a percentage of the aggregate margin requirement for futures customers, Cleared Swaps Customers, and 30.7 customers.

Proprietary margin requirements as a percentage of aggregate customer margin requirements – 4.0%.

(iii) The smallest number of futures customers, Cleared Swaps Customers, and 30.7 customers that comprise fifty percent of the futures commission merchant's total funds held for futures customers, Cleared Swaps Customers, and 30.7 customers, respectively.

Segregated	1
30.7 Secured	1
Customer Cleared Swaps	N/A

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

SanCap, in its capacity as an FCM, does not enter into any non-hedged OTC transactions on a principal basis.

(v) The amount, generic source, and purpose of any committed unsecured lines of credit (or similar short-term funding) the futures commission merchant has obtained but not yet drawn upon.

SanCap maintains a committed subordinated revolving credit facility in the amount of $1.0 billion with its parent, SHUSA. Any amount advanced in accordance with this arrangement will be considered regulatory capital on the date drawn down, subject to SanCap's 70% debt/equity ratio restriction. In addition, SanCap also maintains an uncommitted liquidity loan facility in the amount of $6 billion with its parent, SHUSA.

The Firm had $350 million outstanding subordinated loan as of the most recent month-end reporting period.

In addition, SanCap has a committed general operating liquidity line of $650 million with its parent, SHUSA. The Firm had no outstanding operating loan as of the most recent month-end reporting period.

(vi) The aggregated amount of financing the futures commission merchant provides for customer transactions involving illiquid financial products for which it is difficult to obtain timely and accurate prices.

SanCap does not provide financing for customers transactions involving illiquid products.

(vii) The percentage of futures customer, Cleared Swaps Customer, and 30.7 customer receivable balances that the futures commission merchant 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.

SanCap has not written off as uncollectable any customer receivable balances for any futures customer during a twelve-month period as of the most recent month-end reporting period.

Additional financial information on all FCMs is available on the CFTC's website at the following address: http://www.cftc.gov./MarketReports/FinancialDataforFCMs/index.htm

Financial information regarding the futures commission merchant, including how the futures commission merchant invests and holds customer funds, may be obtained from the NFA:

http://www.nfa.futures.org/

The assets of the FCM are almost 100% related to futures and OTC IRS clearing activities. Give-up activity has no impact on customer balances or receivables.

11. Rule 1.55 (k)(11) – Summary of FCM's Risk Practices, Controls and Procedures

A summary of the futures commission merchant's current risk practices, controls and procedures.

SanCap is a registered FCM with the Commodity Futures Trading Commission ("CFTC") and is a member of the NFA. The Firm currently offers limited execution and clearing services for futures and options on financial and commodity products.

SanCap organizes its roles and responsibilities for risk management into a three lines of defense model described in the SanCap Enterprise Risk Management ("ERM") Framework, with separately defined and segregated responsibilities consistent with applicable regulations and guidance. The three lines of defense model includes the business "risk takers" as the first line of defense, the risk teams (including ERM, Credit, Market and Operational Risk and Compliance) as the second line of defense, and Internal Audit as the third line of defense.

First Line of Defense ("1LoD") – Risk Management

The 1LoD functions are comprised of the CEO, Heads of the Business Lines and Support Units, including Finance, Human Resources and Organization, Technology, Operations, Communications and Marketing. Reporting to the CEO, 1LoD units have responsibility for the primary management of the risks that emanate from their activities. 1LoD units own, identify, measure, control, monitor and report all risks that are originated through activities such as business origination, the development, marketing or distribution of products, client maintenance, or operational or technological processes supporting customer activity. 1LoD is responsible for establishing and maintaining procedures, processes, and controls to manage relevant risks, and implementing corrective actions to address control deficiencies when they arise.

Second Line of Defense ("2LoD") – Risk Control

The 2LoD is responsible for implementing and maintaining a Firm-wide risk management and compliance program to assess and manage risk of the FCM. 2LoD functions are comprised of Risk functions (e.g., ERM, Credit, Market, Liquidity, Operational, Model and Compliance), General Counsel ("GC") and Financial Control reporting to the Chief Financial Officer ("CFO").

- Risk Function reporting to the CIB US Chief Risk Officer ("CRO"): 2LoD unit that defines risk management frameworks, and policies, independently monitors risk exposures, implements comprehensive and appropriate risk controls, and reviews and challenges 1LoD units on their activities to ensure that risk is managed in line with agreed frameworks and Risk Appetite levels. The risk function is comprised of risk-type areas (e.g. ERM, Credit, Market, Liquidity, Operational, Model and Compliance) and other specialized functions (Risk Analytics and Model Development). The ERM Function includes Risk Governance and Reporting, Material Risk Program, Strategic Risk, New Product and Business Activities, Risk Appetite and Risk Data Management. The Compliance Function designs and implements the compliance program reasonably designed to ensure the FCM complies with CFTC and other applicable regulations relating to the FCM business; independently monitors compliance risks for noncompliance with applicable laws and regulations and assesses compliance risk and 1LoD control effectiveness. The 2LoD takes primary responsibility and will be held accountable by the CEO and the Board for designing a comprehensive written risk governance framework that meets regulatory guidelines and is commensurate with the size, complexity, and risk profile of the covered entities.
- Legal Function reporting to the General Counsel: The Legal Function is responsible for advising the business on applicable laws and regulations, reviewing, and approving legal documentation, and engaging outside counsel as necessary.
- Financial Control reporting to the Chief Financial Officer ("CFO"): The Financial Control function is responsible for the integrity of SanCap's financial reporting.

Third Line of Defense ("3LoD") – Risk Assurance

The 3LoD is the Internal Audit department. SHUSA Internal Audit reports to the SHUSA Chief Audit Executive and to the Firm's Board; the department operates independently of any other area. Internal Audit provides independent assurance to the Board and senior management and to SHUSA's Board of Directors by assessing the quality and effectiveness of the processes and systems of internal control, risk management and risk governance, compliance with applicable regulations, and reliability and integrity of financial and operational information.

The Firm maintains a Risk Management Program ("RMP") in accordance with CEA Regulation 1.11. The RMP is based upon successful implementation of forward-looking risk management to strengthen the Firm's resilience to shocks (whether originating internally or externally), thereby promoting a stable environment for business activities. The RPM successfully manages risks in that it establishes and maintains an organizational culture that embraces, by its actions, prudent risk-taking and integrates risk management processes within its day-to-day operations.

The identification, assessment, control, monitoring, testing, and reporting of risks across all risk types, together with the clear articulation and communication of risk appetite and limits, provide the foundation for the RMP.

The RMP covers Credit Risk (including Counterparty Credit Risk), Market Risk (including Currency Risk), Liquidity/Solvency Risk, Segregation Risk, Operational Risk (including Technology Risk), Model Risk, Reputational Risk, Strategic Risk, Compliance Risk and Legal Risk, Affiliate and Margin Risks. The RMP contains policies to address each risk category.

Following is an overview of the policies that are included in the RPM.

CREDIT RISK

The Firm maintains policies and procedures covering intraday margin, credit limits and counterparty credit monitoring/reviews.

MARKET RISK

The Firm maintains policies and procedures for managing market risk through risk measures including Value-At-Risk, economic position and equity equivalent volume and defining operating limits.

LIQUIDITY RISK

The Firm maintains policies and procedures regarding liquidity/solvency risk, including limits, liquidity stress testing, liquidity buffer, liquidity horizon, stressed survival horizon (worst-case scenario),

contingency funding, intraday liquidity risk/collateral management, operating limits, metrics, and guidelines; all of the foregoing are utilized by the Firm to analyze, quantify and mitigate potential risks.

CAPITAL RISK

The Firm maintains policies and procedures to ensure accurate calculation of moment-to-moment net capital, including the computation of the regulatory minimum net capital requirement to ensure the Firm maintains at all times adequate capital levels.

SEGREGATION RISK

The Firm maintains policies and procedures to ensure customer funds are treated in accordance with maintenance, reporting and recordkeeping requirements. These procedures include the maintenance, monitoring and reporting of the Firms' residual interest deposited in segregation for the benefit of the Firm's customers. Related polices ensure compliance with CEA Regulation 1.25(a)(b) that require funds to be invested in high quality instruments taking into consideration the following risks: issuer credit risk, interest rate risk, market risk and liquidity risk. SanCap does not have any investments with affiliates.

OPERATIONAL RISK

The Firm maintains policies and procedures to ensure a controlled operational environment with a focus on employment practices and workplace safety, clients, products, and business practices, as well as execution, delivery, and process management.

TECHNOLOGY RISK

The Firm maintains policies and procedures that establish control requirements designed to protect the Firm as well as customer information from various threats to the security of the information and the systems that store and process such information.

MODEL RISK

The Firm maintains policies and procedures for managing model risk to ensure model monitoring standards are in line with industry best practices and regulatory expectations.

REPUTATIONAL RISK

The Firm maintains policies and procedures regarding reputational risk, including the monitoring of reputational risk limits.

STRATEGIC RISK

The Firm maintains policies and procedures regarding strategic risk, including the monitoring of financial results and strategic risk limits.

LEGAL AND COMPLIANCE RISK

The Firm maintains policies addressing record management requirements, onboarding of new clients and the documentation of transactions, among others. The activity of the FCM is monitored by the Compliance Department for compliance with CEA/CFTC regulations, and NFA, CME Group and ICE rules. The Firm's Compliance Program establishes a framework for a compliance risk management program that reasonably detects, escalates and addresses compliance matters consistent with regulatory expectations.

AFFILIATE RISK

The Firm has a material risk exposure to its ultimate parent, BSSA, which is the Firm's main futures client and its ultimate provider of liquidity. The credit condition of BSSA is assessed and reported on a quarterly basis in the Firm's CEA Regulation 1.11 Risk Exposure Report.

FOREIGN CURRENCY RISK

The Firm has minimal foreign currency risk as the Firm's policy is to promptly convert foreign currencies to be received into US dollars.

The Santander US Risk Appetite has been defined at the Santander Combined US Operations ("CUSO") level, including the Firm's activities. Risk Appetite Statements are established for each risk area, defining the aggregate levels and types of risk that Santander US is willing to accept in the pursuit of its strategic objectives. The Risk Appetite Statement ("RAS") is approved by the SHUSA/CUSO Board. The risk appetite is cascaded to CIB via Risk Management Limits.

The Firm utilizes Management Limits as a tool to assist the Board in monitoring and controlling key risks the Firm is exposed to. The Firm's Management Limits and CUSO RAS establish high-level limits and standards for key risk areas, as well as prohibitions on certain types of business activities or transactions.

The SHUSA/CUSO Board has approved the CUSO Risk Appetite Policy and RAS, including associated limits for primary metrics, thresholds, or triggers; it additionally oversees the alignment of the CIB Management Limits with such frameworks and the Firm's strategic, funding, and capital plans.

The CIB Risk Forum is informed of any limit violations of Management Limits. The Board delegates to the CIB Risk Forum the management and approval of these limits. At a minimum, the metrics and thresholds are annually reviewed.

The Firm has established three levels of risk management controls to manage and monitor risks associated with pre-trade margin and trade limits, monitoring of client and counterparty exposure, and trade cancellation. Further, the Firm has established several levels of risk management controls to manage and monitor risks associated with OTC IRS clearing and settlement.

Internal Audit reports to the Chief Audit Executive and to the SHUSA Board of Directors independent of any other function. Internal Audit provides independent assurance to the SHUSA Board of Directors and to Firm senior management by assessing the quality and effectiveness of the processes and systems of internal control, risk management and risk governance, compliance with applicable regulations, and reliability and integrity of financial and operational information.

Financial Control (reporting to the CFO) is responsible for the integrity of SanCap's financial reporting.