

To: All members and other interested parties

Ref: 26/250

Classification: General Updates

Date: 08 October 2026

Subject: **POLICY RELATING TO POSITION MANAGEMENT ARRANGEMENTS –  
UPDATE TO EXCHANGE POSITION LIMITS**

### Summary

1. This Notice informs Members and other market participants of an update to the Exchange Position Limits pursuant to paragraphs 96 to 101 and Schedule 3 of the Policy Relating to Position Management Arrangements (the “**Policy**”).
2. This update introduces Exchange Position Limits for the LME Steel HRC Shanghai Contract.

### Defined Terms

3. Defined terms used in this Notice shall have the meaning ascribed to them in the Policy unless otherwise defined in this Notice.

### Updates and Effective Date

4. The update to Schedule 3 is reflected in redline in the version of the Policy attached to this Notice in Appendix 1. The updated Policy will be published on the LME website and is immediately effective.

### Questions

5. Should you have any questions regarding this Notice or the Policy please email [market.surveillance@lme.com](mailto:market.surveillance@lme.com).

**Joe Morrison**  
**Head of Market Surveillance**

cc: Board directors

# Policy Relating to Position Management Arrangements



## Policy Relating to Position Management Arrangements

*New text is underlined, deleted text is shown as strikethrough.*

### Introduction

1. The LME has established arrangements designed to ensure that Warrants and positions are subject to ongoing monitoring such that the LME is able to identify and mitigate the risk that positions have with regards to market orderliness, price discovery and the resilience of its markets. Where appropriate, the LME may take such action either directly or through the Special Committee, as deemed appropriate, to ensure that no position holder is able to exercise an undue influence on the market. For the avoidance of doubt, the Exchange or the Special Committee may, in their absolute discretion, take such steps or give directions as they deem appropriate to contain or rectify the situation under any of their powers in the LME Rulebook, irrespective of whether a Regulatory or Exchange Position Limit has been breached or whether a valid Exemption applies.
2. This policy sets out the Rules of the LME in relation to position management arrangements. It should be read in conjunction with the Rulebook and with any other relevant Rules as published from time to time including those set out in the Policy Relating to Regulatory Position Limits and Exemptions.
3. It should be noted that the existence of a dominant position is not abusive *per se*, nor that the LME seeks to prevent the existence of such positions. Instead, the aim is to ensure that where such positions are held by market participants, the ongoing management of the position does not have an undue influence upon the market. For the avoidance of doubt, managing a position on the market would include not only active management through trading activity but also passive management through the lack of market activity – i.e. the withholding of liquidity from the market.

### Defined Terms

4. Terms defined in the LME Rules and Regulations (the “**LME Rulebook**”) shall have the same meaning in this Policy Relating to Position Management Arrangements (the “**Policy**”), unless stated otherwise.

### Position Management Arrangements

5. Members should note that throughout this Policy a 24-hour time format is used and all times refer either to UK Greenwich Mean Time or British Summer Time, depending on whether Daylight Saving Time is being observed.
6. In addition to the ongoing monitoring of positions referred to above, the LME has the following arrangements in place:
  - a) Daily reporting of positions;
  - b) Lending Rules;
  - c) Warrant financing;
  - d) Accountability Thresholds; and
  - e) Exchange Position Limits.
7. In this Policy, the Lending Rules and the Rules on Accountability Thresholds and Exchange Position Limits apply to positions held by Members, Clients, Persons Subject to the Rules and/or any other person. Members and Persons Subject to the Rules must comply with these Rules. While Clients of Members are expected to comply with those Rules and fully cooperate with the LME to this effect, Members shall take reasonable measures and reasonable steps to ensure that their Clients comply with the Rules relevant to Clients set out in this policy at all times. For the avoidance of doubt, in relation to all other Rules in this Notice, Persons Subject to the Rules shall continue to be treated as Clients of Members unless otherwise specified.
8. To be clear, the LME does not consider that the “at all times” requirement under the Rules should be construed as imposing a real-time monitoring obligation on Members and Person Subject to the Rules. Rather, the requirement should be understood as imposing an obligation to monitor positions on a timely basis. Members and Person Subject to the Rules should therefore ensure that the combined effect of



their systems, controls and processes relating to position monitoring and management is sufficient to ensure ongoing compliance with the Rules “at all times”.

9. Further, to support these arrangements, the LME requires Members to provide certain information on a daily basis including position reports and details of financing arrangements, as well as manage Warrant inventory in LMEsword in line with guidance set out within this Policy.
10. Details of the arrangements and reporting requirements are set out below.

### **Daily Reporting of Positions**

11. In accordance with the obligations contained within Regulation 25 of Part 3 of the LME Rulebook, Members must provide a daily Commodity Position Report (“**CPR**”) to the LME in accordance with the format required by the Exchange. These position reports must be submitted to the LME Universal Data Gateway (“**LME UDG**”) and must be received by the LME before 08:30:00 the next business day following the date of the report.

#### Positions to be Reported in CPR files

12. Category 1, 2, 3 and 4 Members must report every single net LME position in respect of:
  - a) All aggregated proprietary accounts of a Member; and
  - b) Any Client account.
13. In respect of Client Contracts, the reports must be compiled on the basis of all Clients who hold those Client Contracts. Where a Member operates an omnibus account on behalf of underlying Clients of an intermediary, the reports must account for each of those underlying Clients separately (except in the case of pooled funds). Members should not treat intermediaries as the holders of aggregated positions if the underlying Clients are the holders of the Client Contracts.
14. Pursuant to Regulation 25.3 of Part 3 of the Rulebook, Members must provide the identity of their Clients and have arrangements with their Clients to ensure that such Clients provide the identity of each of their clients until the end client is reached. However, the obligation under Regulation 25.3 does not override the situation where local laws prevent the disclosure of such information. After a Member has made appropriate attempts to procure approval to disclose the identity of their Client, it may, instead, provide the LME with a reasoned justification concerning the extent to which it is unable to comply with Regulation 25.3. Members should make every effort to comply with the requirements in Regulation 25.3. This means that where a conflict of law prevents the Member from providing the identity of the Client (or its Client is prevented from providing the identity of their own client), Members are expected to provide information in line with Regulation 25 as far down the contractual chain as possible. Moreover where, as is more common, contractual confidentiality provisions apply preventing the identity of the Client being disclosed, the LME expects Members to obtain or renew the consent of their Clients, or alternatively to invoke any term to override those confidentiality provisions and provide the identity of their Client.
15. For each of the Member proprietary or Client accounts described above, net market positions should be reported by an International Securities Identification Number (“**ISIN**”). Each commodity and Prompt Date for Futures Contracts and commodity, option date, option type and Strike Price for Metal Options Contracts have their own unique ISIN. Positions should not be reported twice.
16. Positions reported by Members each morning are those at the close of business on the previous business day. Trades that remain unmatched at close of business should not be included in Member’s position reports the next day. Only positions in LME Contracts should be reported. Over the counter (“**OTC**”) positions or LME look-alikes should not be reported nor netted with LME Contract positions. In the event a Member has unmatched trades at close of business for the Cash prompt they should inform Market Surveillance via email before 08:30:00 the next morning.

#### Reporting Procedure



17. Category 1, 2, 3 and 4 Members must submit their CPR file to Market Surveillance using the LME UDG, before 08:30:00 each business day. Members must have appropriate systems and controls to ensure that data contained in CPR files is complete and accurate.
18. In respect of complete and accurate, this involves the correct population of all fields for all positions reportable within the CPR file including but not limited to the 'Exemption Type' field which should be populated where the Member or their Client has an Exemption. Members must disaggregate within their CPR file, using this field, positions which are eligible under the Exemption and those which are not. Members must have arrangements in place pursuant to the Policy Relating to Position Limits and Exemptions to ensure this information is provided on a timely basis from their Clients.
19. Members should contact both Regulatory Reporting and Market Surveillance immediately if they find that they are unable to meet the daily deadline to submit their CPR file. Members who have to resubmit their CPR file after the reporting deadline because they need to correct erroneous or incomplete submissions must inform both Regulatory Reporting and Market Surveillance of each resubmission as soon as possible.
20. Members must check their report status for transmission or validation error messages sufficiently in advance of the reporting deadline to ensure that they can correct and re-submit their reports to the LME by the required deadline.
21. While Members may delegate the calculation and transmission of their CPR file to third parties, they retain the responsibility under the LME Rulebook for the accuracy and completeness of the data and submission to the LME by the required time. If delegated to a third-party Members must be able to demonstrate appropriate oversight of those submissions, including compliance with the obligations contained in this Notice and the LME Rulebook.
22. Members must ensure that adequate and ongoing testing is undertaken of systems and controls procedures used to report to the LME to ensure that the information provided to the LME is accurate and complete.
23. Members requiring further information on LME UDG or CPR should refer to the relevant specification documents, which can be found on the LME website.

### **LMEsword Warrant Management**

24. Whilst LMEsword does not purport to create a register of beneficial owners of metal to which Warrants relate it is necessary, in order that the LME can effectively monitor positions and issue Lending Rules, for Members to ensure Warrants are managed in line with this Policy.
25. Members must ensure that by no later than 17:00:00 each day all Warrants that are under its control are allocated to specific accounts within LMEsword. The account to which they are allocated to must reflect the party who holds the proprietary interest in the metal to which the Warrants relate (the **"Effective Controller"**).
26. Each Member's LMEsword account that holds Warrants must have a valid short code assigned to it in the Compliance Reference field. This short code must have been uploaded to the LME UDG in a Personally Identifiable Information ("**PII**") file no later than 17:00:00 on the day Warrants are first held in the LMEsword account, and the underlying Legal Entity Identifier ("**LEI**") or natural person information must correspond to the Effective Controller of that Warrant. Members should note that no 'point of entry' validation for the Compliance Reference field is in place and it is therefore a Member's responsibility to ensure the short code entered is in a valid format and has been uploaded to UDG. Further information around PII file submissions can be found on the LME website.
27. For the avoidance of doubt, even in the event that a Warrant has been transferred to a third party, the entity which retains the proprietary interest in the metal to which the Warrant relates would be considered the Effective Controller.
28. There are a number of ways in which a party can achieve effective control of Warrants held by another. These include where:



- (a) the holder of Warrants has an obligation such that they will retain the Warrants while the obligation is outstanding;
  - (b) the person to whom the holder of the Warrants owes the obligation is aware that the Warrants are being held against the obligation; and
  - (c) the person to whom the obligation is owed has effective control over whether those Warrants can become available to the market.
29. Although not an exhaustive list, specific examples of where a proprietary interest may still be retained in a metal to which a Warrant relates, even though it has been transferred to a third party, would include when a Warrant has been placed into a financing arrangement or pledged to LME Clear as collateral.
30. In the event that a Member, or as the case may be, a Client has effective control over (rather than possession of) Warrants, the LME will aggregate those Warrants with other Warrants held by, or to the order of, the Member or, as the case may be, the Client. The result will be that the total number of Warrants will be counted towards the Member's or, as the case may be, the Client's Warrant holdings, Cash Today and Cash positions for the purposes of calculating lending under the Lending Rules. The Lending Rules will therefore apply to the total aggregated number of Warrants.

#### Failure to report in an accurate and timely manner

31. Members are advised that the failure to report CPR files and manage their Warrants in LMEsword in an accurate and timely manner may result in action being taken by the LME. As a general rule, the LME may take action against a Member where errors and/or late submissions are observed on 5 or more business days within a calendar month.
32. There are a variety of circumstances that may lead the LME to conclude that there is an error with a Member's position reporting or Warrant management. These are set out in a non-exhaustive list below:

#### CPR

- (a) **Late submission of files** - Members must submit CPR files before 08:30:00 each business day;
- (b) **Errors in accuracy of positions reported** - The positions reported in Members' CPR files must be free of errors;
- (c) **Duplicate submissions** - Unique positions for each position holder must only be reported once;

#### Warrant Management

- (d) **Late allocation of Warrants** – Members must ensure Warrants are allocated to specific LMEsword accounts no later than 17:00:00;
- (e) **Incorrect allocation of Warrants** – Members must ensure Warrants are allocated to specific LMEsword accounts which identify the Effective Controller of those Warrants. Leaving Warrants in collection accounts overnight would be captured under this type of error;
- (f) **Blank Compliance Reference fields** – Members must ensure that each LMEsword account that holds Warrants contains a valid short code in the Compliance Reference field. This short code, when mapped to data held by the LME, should reflect the Effective Controller of the Warrants; and
- (g) **Invalid short codes** – Each short code in the Compliance Reference field within LMEsword should have been uploaded to LME UDG prior to the LMEsword account having Warrants allocated to it. This is to ensure that the short code can be mapped to the relevant LEI or natural person information held by the LME and the Effective Controller of the Warrant can be identified.

### **Lending Rules**



33. The LME has a regulatory obligation to ensure it has appropriate measures in place to reduce the extent to which the LME can be used for a purpose connected with market abuse, including but not limited to an abusive squeeze. In order to comply with this obligation, the LME issue Lending Rules to market participants holding dominant positions, instructing them to provide a certain amount of liquidity in certain nearby Contracts, to ensure they cannot exert an undue influence on the market price of a particular metal, and in extremis squeeze the market.
34. Within the Lending Rules the price used to calculate the premium each business day is the LME Cash Official Price published the previous business day (the “**Cash Price**”). The maximum premium percentage is expressed as a US dollar amount rounded down to the nearest cent.

### **Tom-Next Lending Rules**

35. The Tom-Next Lending Rules shall apply to positions and Warrants held by Members, Persons Subject to the Rules and Clients.
36. The LME’s Tom-Next Lending Rules require participants to trade between the tomorrow Prompt Date and the Cash Prompt Date (the “**Tom-Next**” spread). These rules rely upon the reporting by Members on a daily basis of all open LME positions as well as Warrant information held in LMEsword at 17:00:00 the previous business day. Using this information the LME will require Members, Persons Subject to the Rules and will expect Clients to adhere to the following obligations:
- (a) If at any time a Member, Person Subject to the Rules or Client holds 50% or more of the Warrants and/or Cash Today/Cash positions in relation to the open Warrant stocks as published at 09:00:00 each morning (“**Live Warrants**”), they must lend or offer to lend, at a premium of no more than 0.5% of the Cash Price for a day, to reduce the position below 50%.
  - (b) If at any time a Member, Person Subject to the Rules or Client holds 80% or more of the Warrants and/or Cash Today/Cash positions in relation to the Live Warrants, they must lend or offer to lend, at a premium of no more than 0.25% of the cash price for a day, to reduce the position below 80%.
  - (c) If at any time a Member, Person Subject to the Rules or Client holds 90% or more of the Warrants and/or Cash Today/Cash positions in relation to the Live Warrants, they must lend or offer to lend, at a premium of no more than level, to reduce the position below 90%.
  - (d) trading out of sufficient Client Contract positions with that Client to reduce that Member’s (or, if two or more Members are directed, those Members’) net exposure to that Client in line with the action taken in compliance with the directions under (a) to (c) above.
37. The Tom-Next Lending Rules have the effect that a dominant position holder must, without delay, lend or offer to lend by entering an order on LMEselect and/or the Ring. This enables the dominant position holder to respond to demand in the market for borrowing at the premium set by the Tom-Next Lending Rules. The dominant position holder is not obliged to lend if the market demand for tom-next borrowing is at a backwardation premium below that specified by the Tom-Next Lending Rules.
38. Lending Tom-Next involves selling for the tomorrow (also referred to as “**tom**”) Prompt Date and buying for the Cash Prompt Date. Where a dominant position holder reduces its Warrant holding (“**W**”), net tom trading position (“**T**”) and net Cash trading position (“**C**”) (**W**, **T** and **C**, known collectively as the “**WTC Position**”), on one day by lending Tom-Next (i.e. selling tom and buying Cash), it will be adding to its **C** position for the purposes of calculating its WTC Position the next morning. This explains how a person may abide by the Tom-Next Lending Rules but maintain a dominant position on successive days.
39. As with the publication of large position information, in determining the application of the Tom-Next Lending Rules, the LME shall aggregate the positions of an entity across all Members in calculating dominant positions. Likewise, the LME shall aggregate the positions of a Member, Person Subject to the Rules or Client and such entity’s related group companies unless the entity can demonstrate that the positions were independent.

### **How to calculate a dominant position**



40. The basis of a relevant position in any metal for the purposes of the Tom-Next Lending Rules is the total of a person's WTC position expressed in Lots. That net WTC Position is divided by the number of Live Warrants, expressed in Lots, for that metal. The result of  $(W + T + C) \div (\text{Live Warrants})$  is expressed as a percentage to two decimal places. For example, a Warrant position of 123 Warrants, a net Tom position of 456 Lots and a net Cash position of 789 Lots will equal 1,368 Lots. If the total number of Live Warrants were 1,500, the WTC Position would be 91.20%.

$$\frac{(123 + 456 + 789)}{1,500} = 91.20\%$$

41. The denominator used is Live Warrants rather than the sum of Live Warrants and cancelled Warrants ("**Total LME Stock**").
42. The resulting percentage forms the basis for calculating the number of Lots that a dominant position holder must be prepared to lend. The Tom-Next Lending Rules treat a WTC Position of 50% and above as dominant. This means that a position holder is subject to the Tom-Next Lending Rules until its WTC Position is reduced to 49.99%. For practical reasons, these percentages need to be expressed in Lots as whole numbers. In the above example, 50% of 1500 Lots equals 750 Lots.
43. Therefore, 749 Lots equals less than 50%. The dominant WTC Position  $(123 + 456 + 789)$  equals 1,368 Lots. The holder would have to be prepared to lend 619 Lots to reduce their WTC Position down to 749 Lots. Expressed as percentages, this means that the dominant position holder must be prepared to lend 41.21%, rounded up to the nearest lot.
44. The figures used in calculating a WTC Position are those reported by Members to the LME before 08:30:00 each business day as well as the Warrants managed by each Member, whether that be for their own account or that of a Client, at 17:00:00 the previous business day. The figures relate to the WTC Positions as at the close of business on the previous business day.
45. The LME automatically aggregates the WTC Positions held by an entity across two or more Members and will also aggregate positions of affiliated companies, such as, but not limited to, those who share a common beneficial owner. The LME may also aggregate the WTC Positions of unconnected parties if the LME believes that there is a common purpose.
46. The net WTC Positions are divided by the number of Live Warrants, which are the same as those included in the stock figures published by the LME at 09:00:00 each business day. The relevant stock figures for complying with the Tom-Next Lending Rules on any tom trading day are those published that morning.
47. As WTC Positions are calculated each morning on the basis of figures as at the close of business on the previous business day, the reported T trading position will have become a delivery obligation for that day and the reported C position will have become a tom position for that day. In order to reduce that reported WTC Position in line with the Tom-Next Lending Rules, the dominant position holder, (be it a Member, Person Subject to the Rules or Client) should be prepared to lend the Tom-Next spread.
48. Any increase in a tom position during a tom trading day that brings the combined Warrant, same-day Warrant delivery and tom position at or above 50% of Live Warrants will be a dominant position for the purposes of the Lending Rules and the dominant position holder should therefore be prepared to lend in accordance with paragraph 36(a) above. Similarly, in the event that a tom position is increased during a tom trading day that brings the combined Warrant, same-day Warrant delivery and tom position at or above 80% or, as the case may be, at or above 90% of the Live Warrants, the dominant position holder should be prepared to lend in accordance with paragraph 36(b) or 36(c) above respectively. In the event a market participant has increased their tom position such that they would be considered a dominant position holder when they previously were not, or the increase in position meant their combined Warrant, same-day Warrant delivery and tom position was now in a higher lending band than previously, they must inform Market Surveillance as soon as possible.

#### How to comply with the Tom-Next Lending Rules



49. The Tom-Next Lending Rules are an obligation placed on those who hold a dominant long position for which the Tom-Next Lending Rules apply. The holder of the dominant position is ultimately responsible for its own compliance with the Tom-Next Lending Rules. Under the Rules, a dominant position holder can be a Member, Person Subject to the Rules or a Client. In the case of a Person Subject to the Rules or a Client, compliance with the Tom-Next Lending Rules may require the Person Subject to the Rules or the Client to give appropriate instructions to one or more of their Members or brokers.
50. Where the LME identifies a dominant position, the holder of that position will be contacted to advise of any steps to be taken with regard to the management of the position. These steps could include adjustments to a WTC Position to account for OTC business being brought onto the market that day. Many Clients prefer to have these discussions directly with the LME rather than go through one or more of their Members or brokers. Although a dominant position holder may discuss their WTC Positions with the LME, the holder of a dominant position is best placed to know the size of their own WTC Positions. Once the LME stock figures are published at 09:00:00 a position holder is able to calculate whether or not its net WTC Position triggers the Tom-Next Lending Rules.
51. Increases or decreases in the LME Live Warrant figures from the previous day's figures may affect whether a WTC Position is dominant and whether that dominance exceeds the 50%, 80% or 90% threshold. For this reason, a dominant position holder is entitled to wait until the LME stock figures are published before complying with the Tom-Next Lending Rules. Notwithstanding the above, a dominant position holder should not delay complying with the Tom-Next Lending Rules and must lend or offer to lend immediately following the publication of the LME stock figures. If there has been a material change in the Live Warrant figures, the dominant position holder and relevant counterparties may, upon the LME's instruction, have to adjust some of the trades executed prior to the LME stock figures being published in order to ensure that the lending has complied with the Tom-Next Lending Rules. In the event adjustments are required they will be processed in chronological order.
52. A dominant position holder must lend at the premium applicable to their highest WTC Position first. If a dominant WTC Position is above 90%, the position holder must lend at level a sufficient number of Lots to bring their position below 90% before they may lend at a premium of 0.25% of the Cash Price. Similarly, they must lend at a premium of no more than 0.25% of the Cash Price a sufficient number of Lots to bring their position below 80% before they may lend at a premium of 0.5% of the Cash Price. The position holder must have reduced their position below 50% before the position holder may lend at a premium greater than those specified by the Tom-Next Lending Rules.
53. Once a dominant position holder has received Lending instructions from Market Surveillance, they must enter orders into LMEselect at 09:00:00 without delay and the offer to lend to the market by the dominant position holder must be active at all times during the tom-next Contract period until all required volume has been fulfilled. In the event the dominant position holder's obligation has not been met before the start of the first Ring session they must also be prepared to respond to bids in the Ring. The purpose of Tom-Next Lending Rules is to address the effect of a Member's, Person Subject to the Rules' or Client's dominant position on short position holders. It would be an abuse of the Tom-Next Lending Rules for a dominant position holder to contrive to lend to another person at the specified premium with the intention that the borrower could then lend in the market at a higher premium.
54. Where the dominant position holder is a Client, the LME will, where possible, instruct them directly. If this Client has not responded to the LME within a reasonable timeframe as determined by the LME in its absolute discretion or fails to comply with the LME's instructions, the LME may instruct any/all of their Clearing Member(s) to carry out the instructions on their behalf, and in doing so, as permitted by the Rules, may disclose to the Clearing Member(s) concerned that the Client is a dominant position holder. All parties are reminded that this information is market sensitive and should be treated as such.

#### Lending on LMEselect

55. A dominant position holder subject to the Lending Rules must without delay enter orders into the LMEselect order book that represent their Tom-Next Lending Rules obligations, once the LME stock figures have been disclosed at 09:00:00. The mechanisms for ensuring orderly trading on LMEselect mean that a lower offer entered into the system will trade with an existing higher bid. If there is a bid in LMEselect that is at a higher premium than that prescribed by the Tom-Next Lending Rules, a dominant position holder must trade with that bid to adjust the price back to the correct premium. This adjustment must be undertaken through LMEsmart.



56. If the dominant position holder does not have direct access to LMEselect, it must make arrangements with its Member(s) and/or broker(s) to take the necessary steps to enter orders into the LMEselect order book without delay on its behalf in an agency capacity and to make adjustments where necessary.

#### Lending in the Ring

57. A bid in the Ring is also a request to the market. The first Ring session for each metal is the last opportunity to lend or borrow Tom-Next by open outcry. A dominant position holder who has not reduced their WTC Position below 50% by the start of the first Ring session must respond to bids in the Ring where those bids reach the premium at which the dominant position holder must be prepared to lend.
58. The mechanisms for ensuring orderly trading in the Ring mean that once a bid to borrow has been made, a lender must either accept that bid or make a higher offer. It is a breach of Regulation 11 of Part 3 of the LME Rulebook to make an offer that is lower than a prevailing bid. If a dominant position holder's WTC Position remains at 50% or above by the start of the first Ring session, it must ensure that it responds to bids and that any lending is at a premium no higher than the premium prescribed by the Tom-Next Lending Rules. In order to ensure this and to abide by the LME Rulebook, it may be necessary for the dominant position holder to offer to lend.

#### Brokers instructed by Clients

59. Where a dominant position holder instructs lending to be carried out through a broker, this must be done in an agency capacity with no markup or commission built into price (i.e. the price of the lend order must be at a premium no more than at the required price level(s)).

#### Minimum Live Warrant Thresholds

60. The following minimum Live Warrant thresholds will be used in the calculation of a dominant position under the Tom-Next Lending Rules. In the event Live Warrants fall to (or below) these thresholds, the Minimum Threshold will replace the Live Warrant in the calculation of the Tom-Next Lending Rules.

| Metal     | Minimum Threshold |
|-----------|-------------------|
| Aluminium | 2,240 Lots        |
| Copper    | 1,220 Lots        |
| Lead      | 840 Lots          |
| Nickel    | 560 Lots          |
| Tin       | 70 Lots           |
| Zinc      | 840 Lots          |

#### **Front Month Lending Rules**

61. The Front Month Lending Rules apply to a Member's, Person Subject to the Rules' or Client's "Cumulative Spot Futures Position", relative to "Total Available Stock", in deliverable Aluminium, Copper, Nickel, Lead, Tin, and Zinc Contracts.
62. A **"Cumulative Spot Futures Position"** is defined as the total of a Member's, Person Subject to the Rules' or Client's aggregated Futures Contracts (including, in relation to Options Contracts, the delta adjusted equivalent futures positions) across each individual Prompt Date and expiry up to and including the next 3rd Wednesday Prompt Date which is not the next available Prompt Date ("**M1**"). As such, when a 3rd Wednesday Futures Contract becomes the tom Contract, then M1 (and thus the Cumulative Spot Futures Position) refers to the following 3rd Wednesday Futures Contract).



63. **“Total Available Stock”** is defined as the Total LME Stock not held by the dominant position holder. For the purposes of this definition, “held” includes any position for which the relevant Member, Person Subject to the Rules or Client is the Effective Controller.
64. In determining the application of the Front Month Lending Rules, the LME will aggregate positions across all LME Clearing Members holding positions for the relevant legal entity and any related group companies (unless the relevant entity can demonstrate to the satisfaction of the LME that the positions are entirely independent and unrelated).
65. Where a Member holds an offsetting OTC Position, they may apply to the LME for an exemption for this position such that the number of lots held OTC can be discounted from their Cumulative Spot Futures Position for the purposes of the relevant calculations pursuant to the Front Month Lending Rules. The LME may grant this exemption at its absolute discretion, taking into account any factor it deems relevant including the counterparty to, size, and purpose of the relevant OTC positions. Any Member wishing to apply for this exemption should contact [market.surveillance@lme.com](mailto:market.surveillance@lme.com) prior to 18:00:00 on the Wednesday before the 3rd Wednesday prior to the position being taken into account in the Cumulative Spot Futures Position. For the avoidance of doubt, Persons Subject to the Rules and Clients cannot apply for this exemption.
66. Positions are calculated using CPR data reported at 08:30:00 on the relevant Business Day. Stock figures are published at 09:00:00 on the relevant Business Day.
67. The basis of a relevant position in any metal for the purposes of the Front Month Lending Rules is the total of a person’s Cumulative Spot Futures Position expressed in Lots. That net position is divided by the number Total Available Stock, expressed in Lots, for that metal. The result of Cumulative Spot Futures Position ÷ Total Available Stock is expressed as a percentage to two decimal places.
68. The resulting percentage forms the basis for calculating the number of Lots that a dominant position holder must be prepared to lend. The Front Month Lending Rules treat a Cumulative Spot Futures Position of 50% and above as dominant. This means that a position holder is subject to the Front Month Lending Rules until its Cumulative Spot Futures Position is reduced to 49.99%. For practical reasons, these percentages need to be expressed in Lots as whole numbers.
69. The LME’s Front Month Lending Rules rely upon the reporting by Members on a daily basis of all open LME positions as well as Warrant information held in LMEsword at 17:00:00 the previous business day. Using this information the LME will require Members and Persons Subject to the Rules and will expect Clients to comply with the following obligations:
- (a) If at any time a Member, Person Subject to the Rules or Client holds 50% or more of the Cumulative Spot Futures Position in relation to the Total Available Stock, they should be prepared to lend, at a premium of no more than 3% of the previous day’s Closing Price of M1, to reduce the position below 50%.
  - (b) If at any time a Member, Person Subject to the Rules or Client holds 80% or more of the Cumulative Spot Futures Position in relation to the Total Available Stock, they should be prepared to lend, at a premium of no more than 1.5% of the previous day’s Closing Price of M1, to reduce the position below 80%.
  - (c) If at any time a Member, Person Subject to the Rules or Client holds 90% or more of the Cumulative Spot Futures Position in relation to the Total Available Stock, they should be prepared to lend, at a premium of no more than at level of the previous day’s Closing Price of M1, to reduce the position below 90%.
70. The price used to calculate the premium each business day is the LME M1 Closing Price published the previous business day. The maximum premium percentage is expressed as a US dollar amount rounded down to the nearest cent.
71. The dominant position holder will be required to make liquidity available by offering to lend M1 to the following 3<sup>rd</sup> Wednesday Prompt Date (“**M2**”) for their Cumulative Spot Futures Position that is in excess of the thresholds specified.



72. If, at 09:00:00 the bid for the M1-M2 carry is **no greater than** the Front Month Lending Rule obligation, then the dominant position holder (whether an existing dominant position holder or a dominant position holder due to an update in Total Available Stock) should, without delay, offer to lend M1-M2 no greater than at the required price level(s) required by the Front Month Lending Rules, and should continue to offer to lend at the required price level(s) until such a time that they do not have a Front Month Lending Rule obligation.
73. If, at 09:00:00 the bid for the M1-M2 carry is **greater than** the Front Month Lending Rule obligation, then the dominant position holder should between 09:00:00 and 13:30:00 reduce their position in line with their obligation in an orderly manner, such that that by 13:30:00 at the latest they either no longer have a Front Month Lending Rule obligation, or they are offering to lend the M1-M2 carry at the required price level(s), after which they should continue to offer the M1-M2 carry at the required price level(s) until such a time that they do not have a Front Month Lending Rule obligation.
74. In line with the above, by 13:30:00, a dominant position holder is required to have lent their Front Month Lending Rule obligation or to be offering to lend M1-M2 at the required price level(s) should they still have a Front Month Lending Rule obligation. After 13:30:00, should the dominant position holder lend at a price greater than the required price level(s), then such transactions will be price adjusted to the appropriate price level(s).

#### How to comply with the Front Month Lending Rules

75. The offer to lend to the market by the dominant position holder must be active at all times during LMEselect opening hours. This means that the relevant order(s) must persist on the LMEselect order book until all required volume has been fulfilled.
76. If the dominant position holder lends this volume via broker(s), this lending must take place on LMEselect in an agency capacity with no markup or commission built into price (i.e. the price of the lend order must be at a premium no more than at the required price level(s)).
77. No Member, Person Subject to the Rules or Client shall, at any time, increase their Cumulative Spot Futures Position should this result in them taking a position in excess of 150% of Total Available Stock, or increasing an existing position which exceeds 150% of Total Available Stock.
78. It is the responsibility of the dominant position holder to ensure that they are compliant with the Front Month Lending Rules at all times. Notwithstanding the obligation of a Client to comply, Members shall take reasonable measures and reasonable steps to ensure that their Clients comply with the Front Month Lending Rules.
79. Where the dominant position holder is a Client, the LME will instruct them directly and expect the Client to comply with its instructions. If this Client has not responded to the LME within a reasonable timeframe as determined by the LME in its absolute discretion or fails to comply with the LME's instructions, the LME may instruct any/all of their Clearing Member(s) to carry out the instructions on their behalf, and in doing so, may disclose, as permitted under the Rules, to the Clearing Member(s) concerned that the Client is a dominant position holder. All parties are reminded that this information is market sensitive and should be treated as such.

#### Minimum Total Stock Thresholds

80. The following minimum Total LME Stock thresholds will be used in the calculation of the Front Month Lending Rules calculation. In the event Total LME Stock falls to (or below) these thresholds, the Minimum Threshold will replace the Total LME Stock used in the calculation of the Front Month Lending Rules.

| <u>Metal</u> | <u>Minimum Threshold</u> |
|--------------|--------------------------|
| Aluminium    | 6,400 Lots               |
| Copper       | 3,200 Lots               |



|        |            |
|--------|------------|
| Lead   | 2,400 Lots |
| Nickel | 1,600 Lots |
| Tin    | 200 Lots   |
| Zinc   | 2,400 Lots |

## Reporting of Financing Arrangements

81. Members are required to inform the LME of financing arrangements to which the Member is a party and whether they or their Clients do not hold but have effective control over Warrants. Members must notify the LME by completing the template form attached at Schedule 1 and sending it to Market Surveillance at [market.surveillance@lme.com](mailto:market.surveillance@lme.com) before or at the start of the financing arrangement. The Member must also notify Market Surveillance by email when the financing arrangement ends or when it has been amended.

## Accountability Thresholds

82. The LME considers it appropriate to have specific arrangements in place for the provision of additional information, for positions that are above certain levels ("**Accountability Thresholds**"). The Accountability Thresholds serve as an early warning mechanism, enabling the LME to identify potentially disruptive positions and monitor positions in Critical and Related Contracts in respect of "Regulatory Position Limits" as defined by the LME's Policy in Relation to Regulatory Position Limits and Exemptions. To have a holistic view and comprehension of the market and in order to ensure market orderliness in relation to the market for the Critical and Related Contracts, the LME applies Accountability Thresholds to over-the-counter contracts which have the same underlying metal as the Critical and Related Contracts.

### Calibration and Publication

83. The current Accountability Thresholds are set out at Schedule 2. For the avoidance of doubt, without prejudice to any other Rule, the LME reserves the right to amend the Accountability Thresholds, and the LME will advise of any updates by Notice. In addition, Accountability Thresholds for other LME Contracts may be introduced from time to time, as advised by the LME by Notice.

### General

84. The Accountability Thresholds shall apply to any position held by a Member, Person Subject to the Rules Client and/or any person trading the Contracts and over-the-counter contracts set out in Schedule 2 and will apply to positions held at the end of day. Members and Person Subject to the Rules must comply with the Accountability Thresholds. Members shall take reasonable measures and reasonable steps to ensure that their Client complies with the Accountability Thresholds.
85. Members, Persons Subject to the Rules, Clients and any other person may (unless directed otherwise) hold positions that are in excess of the Accountability Threshold.
86. Accountability Thresholds shall apply to all positions held by Members, Persons Subject to the Rules and Clients:
- (a) separately to:
    - i. Critical and Related Contracts as defined in the Rules ("**LME Contracts**")<sup>1</sup>; and

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<sup>1</sup> The list of Critical Contracts and Related Contracts is available in the Policy Relating to Regulatory Position Limits and Exemptions.



- ii. over-the-counter contracts as defined under Regulation 24 of Part 2 of the Rules ("**OTC Contracts**"); and

(b) to aggregated LME Contracts and OTC Contracts.

- 87. If a position exceeds an Accountability Threshold the LME (including through the Special Committee) may require further information as to the nature and purpose of the position of that account (or, if appropriate, linked accounts as determined by the LME Contracts or OTC Contracts positions taken into account). The LME may also direct that Members (including on behalf of their relevant Client(s)) or Person Subject to the Rules cannot accept further orders that increase the position of LME Contracts, or direct that the position be reduced including but not limited to a level below the Accountability Threshold. The Member or Person Subject to the Rules shall comply with such directions. The Member shall be fully liable and responsible for ensuring that its Client comply with such directions.
- 88. Upon request, Members, Clients or Person Subject to the Rules are required to provide all relevant information relating to the position to the LME. Notwithstanding the expectation placed on Clients that they will provide information to the LME, Members shall take reasonable measures and reasonable steps to ensure that their Client complies with the LME's request. Where a Client provides the requested information to the LME the Member will have been deemed to have responded to the LME's original request for additional information.
- 89. Information provided for the purposes of the Accountability Thresholds must be true, accurate, complete and provided on a timely basis. The LME is aware that the information provided may include commercially sensitive information and therefore will be held in confidence in accordance with the provisions of Part 2 of the LME Rulebook (subject to the exclusions listed therein).
- 90. Where Accountability Thresholds apply to LME Contracts, this includes positions covered by a valid Exemption under the Rules. For the avoidance of doubt, the LME monitors and may query Exempt positions to ensure they remain consistent with the risk requirements.

#### Netting and aggregation for the purposes of Accountability Thresholds

- 91. In relation to both LME Contracts and OTC Contracts, Accountability Thresholds apply to net positions held:
  - (a) at an individual entity (position holder) level; and
  - (b) at an aggregated group level (that is their own net positions netted with positions held on their behalf at an aggregated group level).
- 92. The period of aggregation of the Accountability Thresholds for both LME Contracts and OTC Contracts shall be:
  - (a) as defined by the LME Policy Relating to Regulatory Position Limits and Exemptions:
    - i. Spot Month Contracts; and
    - ii. Other Months' Contracts; and
  - (b) maximum cumulative (which shall include every Prompt Date and expiry date (both in the Spot Month Contracts and the Other Months' Contracts) identifying the peak position across the full curve of positions.
- 93. For the purpose of calculating positions of LME Contracts in the Spot Month Contract, Other Months' Contracts and maximum cumulative, the LME shall aggregate the net positions across all Prompt Dates and expiry dates in the Critical and Related Contracts.
- 94. For the purpose of calculating positions of OTC Contracts in the Spot Month Contracts, Other Months' Contracts and maximum cumulative, the LME shall aggregate the net positions across all Prompt Dates and expiry dates in all OTC Contracts.



95. For the purpose of calculating aggregated positions across LME Contracts and OTC Contracts in the Spot Month Contracts, Other Months' Contracts and max cumulative, the LME shall aggregate the net positions across all Prompt Dates and expiry dates in Critical and Related Contracts (LME Contracts) and all OTC Contracts.

### **Exchange Position Limits**

96. The Lending Rules apply to all products on which Warrants are issued and where stock figures are published by the LME. However, the LME makes available for trading other products where no stock figures are available. In these instances but without limitation, the LME may apply Exchange Position Limits.
97. Exchange Position Limits where applicable shall apply to all positions held by Members, Persons Subject to the Rules, Clients and/or any other person at all times. Members and Persons Subject to the Rules, must comply with Exchange Position Limits at all times. A Member shall take reasonable measures and reasonable steps to ensure that its Client's position complies with an Exchange Position Limit, at all times, where such limit is applicable.
98. Members and Person Subject to the Rules are required to notify the LME of any breach of a Exchange Position Limit on an "immediate" basis. This immediacy requirement should be read in its ordinary meaning and should not be understood as imposing a real-time monitoring obligation.
99. Exchange Position Limits published by the LME apply to all Prompt Dates and are triggered when the net position held exceeds the relevant Exchange Position Limit. Where a position exceeds the relevant Exchange Position Limit, the LME may request further information regarding the position of that account or linked accounts, and the LME may also give directions to the Member (including on behalf of their Client) and/or Person Subject to the Rules in respect of the position of that account or linked accounts.
100. The current Exchange Position Limits are set out at Schedule 3. The LME reserves the right to amend these Exchange Position Limits, and the LME will advise of any updates by Notice. In addition, Exchange Position Limits for other Contracts may be introduced from time to time, as advised by the LME by Notice.
101. When requested by the LME, Members or Person Subject to the Rules must provide the LME with certain information relating to a position. Notwithstanding the expectation placed on a Client to provide the requested information to the LME, Members shall take reasonable measures and reasonable steps to ensure that their Clients provide all relevant information to the LME. Where a Client provides the requested information directly to the LME the Member will be deemed to have responded to the LME's original request for information. The LME may also contact the position holder directly to obtain further information. The LME is aware that the information provided may include commercially sensitive information. Such information will be held in confidence in accordance with the provisions of Part 2 of the LME Rulebook (subject to the exclusions listed therein).

### **Enforcement of Position Management Arrangements**

102. Regulation 17 (Emergencies) of Part 3 of the LME Rulebook sets out the powers of the Special Committee in the event that it has cause to suspect the existence of or to anticipate the development or likely development of an undesirable situation or undesirable or improper trading practice which in its opinion has affected or is likely to affect the market.
103. For the avoidance of doubt, the Special Committee may, in its absolute discretion, take such steps as it deems appropriate to contain or rectify the situation under any of its powers in the LME Rulebook, irrespective of whether a Regulatory Position Limit or an Exchange Position Limit has been breached or whether a valid Exemption applies. This may include, without limitation, a direction to reduce a position to below the relevant Accountability Threshold and/or a Regulatory/Exchange Position Limit. Further, a direction to reduce a position may be issued even where the position is already below the relevant Accountability Threshold and/or Exchange Position Limit.



104. Without prejudice to any other Rule, under Regulation 29 of Part 3 of the LME Rulebook, the Exchange may take any steps or make any directions it deems appropriate in relation to any position held by any person in accordance with its powers stated therein.
105. The powers of the LME under Regulation 17 of Part 3 or under Regulation 29 of Part 3 of the LME Rulebook shall apply to positions held by Members, Persons Subject to the Rules, Clients and/or any other person. Notwithstanding the expectation placed on a Client to comply with any step taken or any direction made by the Special Committee or the Exchange, a Member shall be fully liable and responsible for ensuring that its Client comply with such step or direction. A Client who refuses to comply with any step taken or any direction made by the Special Committee or the Exchange may be declared a "Client of Concern" under the Rules.
106. Any Member or Person Subject to the Rules contravening or failing to comply with the Position Management Arrangements, including but not limited to any direction or instruction issued by the LME (directly or through the Special Committee) shall be in breach of the Rules and therefore an Act of Misconduct. Such breaches may be subject to an automatic penalty or subject to an Investigation and disciplinary proceedings as outlined in the Rulebook.
107. Members, Persons Subject to the Rules or Clients with queries regarding this policy should contact Market Surveillance at [market.surveillance@lme.com](mailto:market.surveillance@lme.com).



## Amendment and Change History

| Version        | Author              | Revisions                                         |
|----------------|---------------------|---------------------------------------------------|
| January 2025   | Market Surveillance | Update to Accountability Levels.                  |
| May 2025       | Market Surveillance | Update to Accountability Levels                   |
| June 2025      | Market Surveillance | Introduction of the Front Month Lending Rules     |
| October 2025   | Market Surveillance | Consultation                                      |
| February 2026  | Market Surveillance | Decision Notice                                   |
| February 2026  | Market Surveillance | Consultation relating to PS25/1                   |
| April 2026     | Market Surveillance | Decision Notice relating to PS25/1                |
| September 2026 | Market Surveillance | Exchange Position Limits - LME Steel HRC Shanghai |

## Schedule 1

### Reporting of Warrant Financing Arrangements (in Excel or CSV format)

| Field | Column Name          | Description                                                                                                                                                                                                                                  | Mandatory (M)<br>Optional (O)<br>Conditional (C) | Data Type                              | Sample Data                       |
|-------|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|----------------------------------------|-----------------------------------|
| 1     | Member Mnemonic      | The 3-letter code assigned to the Member submitting the financing arrangement                                                                                                                                                                | M                                                | CHAR-3                                 | 'XXX'<br>'YYY'                    |
| 2     | Warrant Holder       | The entity in possession of the Warrants under the financing arrangement. Note this does not necessarily have to be the Member, or the Effective Controller, it could be a Client of the Member who is financing Warrants for a third party. | M                                                | ALPHANUM-256                           | 'ABC TRADING LTD'<br>'JOHN SMITH' |
| 3     | Effective Controller | The entity, or natural person, that maintains effective control of the Warrants under the financing arrangement. See paragraphs 25 and 26 for further details.                                                                               | M                                                | ALPHANUM-256                           | 'ABC TRADING LTD'<br>'JOHN SMITH' |
| 4     | MiFID short code     | The MiFID short code that corresponds to the Effective Controller.                                                                                                                                                                           | M                                                | INTEGER                                | '123456789'                       |
| 5     | Start Date           | The date at which the financing arrangement began.                                                                                                                                                                                           | M                                                | ISO 8601 extended format<br>YYYY-MM-DD | 2019-03-01                        |
| 6     | End Date             | The date at which the financing arrangement is expected to end.                                                                                                                                                                              | O                                                | ISO 8601 extended format<br>YYYY-MM-DD | 2019-03-01                        |
| 7     | Metal                | 2 letter code identifying the metal                                                                                                                                                                                                          | M                                                | CHAR-2                                 | 'AH' – Aluminium<br>'CA' – Copper |
| 8     | Number of Warrants   | Number of Warrants held under the financing arrangement                                                                                                                                                                                      | M                                                | INTEGER                                | '150'                             |
| 9     | Additional Comments  | Any additional details the Member deems relevant to the LME with respect to the financing arrangement in place.                                                                                                                              | O                                                | ALPHANUM-256                           |                                   |



## Schedule 2

### Accountability Thresholds

| Contract Code | Spot Month Contracts Accountability Threshold (Lots) | Other Months' Contracts Accountability Threshold (Lots) | Max Cumulative Accountability Threshold (Lots) |
|---------------|------------------------------------------------------|---------------------------------------------------------|------------------------------------------------|
| AH            | 15,000                                               | 22,500                                                  | 22,500                                         |
| CA            | 9,000                                                | 12,500                                                  | 12,500                                         |
| NI            | 5,500                                                | 7,000                                                   | 7,000                                          |
| PB            | 3,500                                                | 4,000                                                   | 4,000                                          |
| SN            | 500                                                  | 550                                                     | 550                                            |
| ZS            | 5,000                                                | 6,500                                                   | 6,500                                          |



### Schedule 3

#### Exchange Position Limits (Lots)

| Contract Code        | Exchange Position Limits (Lots) |
|----------------------|---------------------------------|
| AN (US Midwest)      | 2,500                           |
| AS (South-East Asia) | 2,500                           |
| AE (East Asia)       | 2,500                           |
| AW (West Europe)     | 2,500                           |

| <u>Contract</u>               | <u>Exchange Position Limit in the Expiry Month* (Lots)</u> | <u>Exchange Position Limit in the Other Months** (Lots)</u> |
|-------------------------------|------------------------------------------------------------|-------------------------------------------------------------|
| <u>LME Steel HRC Shanghai</u> | <u>4,500</u>                                               | <u>60,000</u>                                               |

\*For the LME Steel HRC Shanghai Contract, compliance with the Exchange Position Limit in the “Expiry Month” must be determined on the basis of the number of Lots of the LME Contract which expire in the current calendar month.

\*\* For the LME Steel HRC Shanghai Contract, compliance with the Exchange Position Limit in the “Other Months” must be determined on the basis of the number of Lots of the LME Contract in expiries beyond the “Expiry Month”.