



Risk Notice 2025-021

Publication Date 6 May 2025
Enforcement Date 9 May 2025
Subject Position Limit
Clearing Service DigitalAssetClear
Classification PUBLIC

Pursuant to the Instruction n° IV.1-1, LCH SA sets the applicable Open Position limits on Digital Asset Derivative Contracts hereafter.

For Bitcoin Digital Asset Derivative Contracts, the Open Position limit is based on the overall underlying index rate exposure commingling Bitcoin future contracts (GFBTF) and Bitcoin option contracts (GFBTO, GFBT1, GFBT2, GFBT3, GFBT4) positions and applies to the total delta equivalent underlying index rate position at Position Account level:

The limit is set at **40% of the Open Interest¹** of the relevant futures contracts **with a materiality threshold at \$500m**.

The total delta equivalent underlying index rate position on a given underlying is the net Open Position coming from index future contracts and index option contracts referencing this index. For option contracts, the delta² of the option contracts is used to determine the equivalent index Open Position.

The Open Position limits and the thresholds set forth in this Notice apply to all Open Positions in the relevant Digital Asset Derivative Contracts registered in both House Position Accounts and Client Position Accounts for each Clearing Member.

LCH SA may at its own discretion, update the Open Position limits and the thresholds hereof or request additional information from a Clearing Member or call any extraordinary Margin to appropriately manage the risk related to the relevant Open Positions, in accordance with Articles 4.1.1.3 and 4.2.1.4 of the Digital Asset Derivatives Rule Book.

¹ Open interest is disclosed on LCH Portal

² The Delta of the options is provided in the Margins Parameters file



Example

For Bitcoin - GFOXBR - DE000A3EE6J0

Position Account	Equivalent Underlying Index position (including CVF, options and futures)	Underlying Index Price in Ccy	Net value of Equivalent Underlying Index position in Ccy	Ccy	Index Materiality Threshold in USD	Is materiality threshold reached?	Future OI in eq index rate (including CVF)	Ratios Pos delta abs/OI delta	Is Limit reached?	Breach
CMF1 - PA1	2 947	63 420,50	186 900 214	USD	500 000 000	NO	9 000	33%	NO	NO
CMF1 - PA2	3 856	63 420,50	244 549 448	USD	500 000 000	NO	9 000	43%	YES	NO
CMF2 - PA3	5 341	63 420,50	338 728 891	USD	500 000 000	NO	9 000	59%	YES	NO
CMF3 - PA4	7 976	63 420,50	505 841 908	USD	500 000 000	YES	9 000	89%	YES	YES

Customer Success Management team (DigitalAssetClear.csm@lseg.com) remains at your disposal for any additional questions.