COMMODITY TRADING ADVISOR DISCLOSURE DOCUMENT

OF

PEREGRINE COMMODITIES LLC

5626 NW 60TH Street Kansas City, MO 64151 (816) 728-2459

Commodity Futures Trading Programs

<u>The Strategic Growth: Elite (Formerly The December Corn Clip</u> <u>Program, and The Strategic Growth: Platinum</u>

THE COMMODITY FUTURES TRADING COMMISSION HAS NOT PASSED UPON THE MERITS OF PARTICIPATING IN THIS TRADING PROGRAM NOR HAS THE COMMISSION PASSED ON THE ADEQUACY OR ACCURACY OF THIS DISCLOSURE DOCUMENT.

No person or entity is authorized to give any information or make any representation not contained in this Disclosure Document in connection with the matters described herein, and, if given or made, such information or representation must not be relied upon as having been authorized by Peregrine Commodities LLC.

The effective date and date of intended first use of this Disclosure Document is September 21, 2024. This document is considered outdated after September 20, 2025.

This Disclosure Document should be read carefully and in its entirety by all prospective clients.

RISK DISCLOSURE STATEMENT

THE RISK OF LOSS IN TRADING COMMODITY INTERESTS CAN BE SUBSTANTIAL. YOU SHOULD THEREFORE CAREFULLY CONSIDER WHETHER SUCH TRADING IS SUITABLE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. IN CONSIDERING WHETHER TO TRADE OR TO AUTHORIZE SOMEONE ELSE TO TRADE FOR YOU, YOU SHOULD BE AWARE OF THE FOLLOWING:

IF YOU PURCHASE A COMMODITY OPTION YOU MAY SUSTAIN A TOTAL LOSS OF THE PREMIUM AND OF ALL TRANSACTION COSTS.

IF YOU PURCHASE OR SELL A COMMODITY FUTURES CONTRACT OR SELL A COMMODITY OPTION OR ENGAGE IN OFF-EXCHANGE FOREIGN CURRENCY TRADING YOU MAY SUSTAIN A TOTAL LOSS OF THE INITIAL MARGIN FUNDS OR SECURITY DEPOSIT AND ANY ADDITIONAL FUNDS THAT YOU DEPOSIT WITH YOUR BROKER TO ESTABLISH OR MAINTAIN YOUR POSITION. IF THE MARKET MOVES AGAINST YOUR POSITION, YOU MAY BE CALLED UPON BY YOUR BROKER TO DEPOSIT A SUBSTANTIAL AMOUNT OF ADDITIONAL MARGIN FUNDS, ON SHORT NOTICE, IN ORDER TO MAINTAIN YOUR POSITION. IF YOU DO NOT PROVIDE THE REQUESTED FUNDS WITHIN THE PRESCRIBED TIME, YOUR POSITION MAY BE LIQUIDATED AT A LOSS, AND YOU WILL BE LIABLE FOR ANY RESULTING DEFICIT IN YOUR ACCOUNT.

UNDER CERTAIN MARKET CONDITIONS, YOU MAY FIND IT DIFFICULT OR IMPOSSIBLE TO LIQUIDATE A POSITION. THIS CAN OCCUR, FOR EXAMPLE, WHEN THE MARKET MAKES A "LIMIT MOVE."

THE PLACEMENT OF CONTINGENT ORDERS BY YOU OR YOUR TRADING ADVISOR, SUCH AS A "STOP-LOSS" OR "STOP LIMIT" ORDER, WILL NOT NECESSARILY LIMIT YOUR LOSSES TO THE INTENDED AMOUNTS, SINCE MARKET CONDITIONS MAY MAKE IT IMPOSSIBLE TO EXECUTE SUCH ORDERS.

A "SPREAD" POSITION MAY NOT BE LESS RISKY THAN A SIMPLE "LONG" OR "SHORT" POSITION.

THE HIGH DEGREE OF LEVERAGE THAT IS OFTEN OBTAINABLE IN COMMODITY INTEREST TRADING CAN WORK AGAINST YOU AS WELL AS FOR YOU. THE USE OF LEVERAGE CAN LEAD TO LARGE LOSSES AS WELL AS GAINS.

IN SOME CASES, MANAGED COMMODITY ACCOUNTS ARE SUBJECT TO SUBSTANTIAL CHARGES FOR MANAGEMENT AND ADVISORY FEES. IT MAY BE NECESSARY FOR THOSE ACCOUNTS THAT ARE SUBJECT TO THESE CHARGES TO MAKE SUBSTANTIAL TRADING PROFITS TO AVOID DEPLETION OR EXHAUSTION OF THEIR ASSETS. THIS DISCLOSURE DOCUMENT CONTAINS, AT PAGE 14, A COMPLETE DESCRIPTION OF EACH FEE TO BE CHARGED TO YOUR ACCOUNT BY THE COMMODITY TRADING ADVISOR.

THIS BRIEF STATEMENT CANNOT DISCLOSE ALL THE RISKS AND OTHER SIGNIFICANT ASPECTS OF THE COMMODITY INTEREST MARKETS. YOU SHOULD THEREFORE CAREFULLY STUDY THIS DISCLOSURE DOCUMENT AND COMMODITY INTEREST TRADING BEFORE YOU TRADE, INCLUDING THE DESCRIPTION OF THE PRINCIPAL RISK FACTORS OF THIS INVESTMENT, AT PAGE 9.

THIS COMMODITY TRADING ADVISOR IS PROHIBITED BY LAW FROM ACCEPTING FUNDS IN THE TRADING ADVISOR'S NAME FROM A CLIENT FOR TRADING COMMODITY INTERESTS. YOU MUST PLACE ALL FUNDS FOR TRADING IN THIS TRADING PROGRAM DIRECTLY WITH A FUTURES COMMISSION MERCHANT OR RETAIL FOREIGN EXCHANGE DEALER, AS APPLICABLE.

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ABOUT THE ADVISOR

Peregrine Commodities LLC (the "Advisor") is a Missouri limited liability company that was formed in November 2006. On November 20, 2006, the Advisor became registered as an introducing broker with the Commodity Futures Trading Commission ("CFTC") and became a Member of National Futures Association ("NFA"). For the last ten years, Peregrine has solicited, serviced, and introduced customer accounts to Futures Commission Merchants ("FCM") and earned a for each commodity futures contract traded. Currently, Peregrine Commodities LLC is guaranteed by Straits Financial LLC, an FCM. CFTC regulations require that a guaranteed introducing broker only introduce customer accounts to its guaranteer FCM.

On August 17, 2022, the Advisor became registered as a Commodity Trading Advisor ("CTA") with the CFTC. From August 2022 through November 2023, the Advisor was inactive and did not take power of attorney over any customer accounts. In December 2023, the Advisor began to trade client accounts pursuant to power of attorney.

As of the date of this document, the Advisor maintained discretionary authority over 19 client accounts with total nominal assets under management of \$2,118,000. See PAST TRADING PERFORMANCE on page 19.

The Advisor offers two Programs, the Strategic Growth: Elite (formerly known as the December Corn Clip Program), and the Strategic Growth: Platinum. Although there is no guarantee that the Advisor's trading Programs will result in positive performance results, the Advisor's primary business is to provide capital appreciation to retail and institutional client accounts by managing their accounts pursuant to the Advisor's proprietary futures trading Programs.

Mr. Jason Peregrine is the sole member and sole trading principal of the Advisor. A biographical description is presented below under "About the Principal".

The Advisor's main business address is 5626 NW 60th Street, Kansas City, MO 64151. The Advisor's telephone number is (816) 728-2459. The Advisor's email is peregrinecommoditiesllc@gmail.com.

Although the Advisor does not currently trade commodities/futures for its own account it may do so in the future. Trading records along with any written policies related to such trading would be made available for clients' inspection, upon 30 days' advance written notice, at the office of the Advisor during normal business hours.

The effective date and date of intended first use of this Disclosure Document is September 21, 2024.

ABOUT THE PRINCIPAL

Jason Peregrine

Jason Peregrine was born in Hamburg, Iowa. He attended and graduated from Northwest Missouri State University with a Bachelor of Science degree in Business Management.

Jason Peregrine is the sole member and sole trading principal of the Advisor. He became a listed principal of the Advisor on November 9, 2006 and a registered associated person on November 20, 2006. For the last ten years, Mr. Peregrine's responsibilities related to the Advisor's operations as an introducing broker whereby Mr. Peregrine solicited customers to trade commodity futures and serviced those customers on a daily basis by monitoring positions and market movement, and providing customers with market conditions. In addition, in December 2023, Mr. Peregrine began Peregrine Commodities LLC's operations as a commodity trading advisor.

From July 2019 through January 2023, Mr. Peregrine was a senior account executive for Rewards Network. Rewards Network works with restaurants to help increase business by providing funding as well as sending business to the restaurant. Mr. Peregrine's responsibility was to find new restaurants to partner with.

Mr. Peregrine trades commodities and futures for his own personal account. Trading records along with any written policies related to such trading would be made available for clients' inspection, upon 30 days' advance written notice, at the office of the Advisor during normal business hours.

As of the date of this document, Mr. Peregrine did not maintain discretionary authority over any client accounts. See PAST TRADING PERFORMANCE on page 19.

TRADING PROGRAMS

Description of the Investment Programs

Although there can be no guarantee that trading will be successful and that Clients will not experience losses, the Advisor strives to consistently provide positive returns and to minimize draw downs on a monthly basis.

The following is a description of the Advisor's Programs (the "Programs"). The Advisor offers the following Programs:

- Strategic Growth: Elite (formerly known as the December Corn Clip Program); and,
- Strategic Growth: Platinum

The exact nature of the Programs is proprietary and confidential. The following description is intended to be general.

The Programs are approximately 85% systematic and approximately 15% discretionary. The Programs use a proprietary formula with technical research to establish short-term to mid-term positions looking to capture price trends in the corn futures market. Options on futures contracts may be used as part of the Programs. The Programs use stop entry and exits based on the Advisor's trading algorithm. It should be noted that stop-loss orders become market orders when activated and therefore, there is no guarantee that such orders will be filled at the stop points. Further, stop loss orders may not necessarily limit losses to the determined amounts in the event that market conditions make it impossible to execute such orders.

Futures traders basically rely on either of two types of analysis for their trading decisions, "technical" or "fundamental". Technical analysis uses the theory that a study of the markets themselves will provide a means of anticipating price changes. Technical analysis generally will include a study of actual daily, weekly, and monthly prices, trading volume variations, change in open interest, charts and other technical indicators for analysis. Such analysis may not in fact be applicable to the current markets (which many perceive as undergoing rapid and significant changes) and may be of little use when fundamental factors, particularly unexpected occurrences, such as certain governmental interventions, dominate the market. In contrast fundamental analysis relies on a study and evaluation of macro and micro economic forces which affect the price of a futures contract such as supply and demand, changes in money supply, weather, exchange control programs, and policies of various governments, national and international political analysis to make trading decisions and does not generally rely on fundamental analysis.

Trading programs are generally classified as either "systematic" or "discretionary" or a varying combination of the two. Systematic traders follow non-emotional sets of trading rules often based on mathematical models or market behavior. Discretionary traders, on the other hand,

apply judgment and intuition in making every trading decision. The Programs apply these principals in the form of proprietary indicators to the corn market. The Programs then calculate pivotal areas of price action, areas where prices are likely to accelerate in the direction of the current trend. Based on these price point calculations, trades are initiated in the appropriate futures contracts. The design of the Programs provide for both long and short positions. The Programs utilize cash for margin requirements and conservative risk management techniques to attempt to preserve capital.

The Programs trade only December corn contracts on the Chicago Board of Trade. Trading the December contract may begin as early as November in the preceding year (e.g., if December 2054 corn was to be traded, trading the contract could start as early as November 2024). Other futures markets may be added to the Programs at any time at the discretion of the Advisor. However, any material changes in the Programs would be conveyed to Clients within twenty-one days of the change as required by CFTC Regulations.

The Advisor performs ongoing research into the characteristics of the markets it trades in. Such research includes price cycles, momentum and breakout studies as well as accepted technical price indicators as they apply to price dynamics.

Margin to Equity

Generally, approximately 15% to 30% of a client's account size will be committed to margining positions in the Strategic Growth: Elite Program. Generally, approximately 10% to 20% of a client's account size will be committed to margining positions in the Strategic Growth: Platinum Program. These percentages are only estimates and can vary significantly depending on market conditions.

The Advisor generally trades 10 corn contracts per \$70,000 investment in the Strategic Growth: Elite Program, and 8 corn contracts per \$104,000 investment in the Strategic Growth: Platinum Program.

Margin to equity will be greater in terms of actual cash in the account in the event notional funds exist in the account.

NOTIONAL FUNDING

Clients must initially fund their trading account with actual cash of \$70,000 for the Strategic Growth: Elite Program. The Advisor does not permit accounts to be initially funded with notional funds in the Strategic Growth: Elite Program. Clients must initially fund their trading accounts with a nominal account size of \$104,000 for the Strategic Growth: Platinum Program. The Advisor permits notional funds in the Strategic Growth: Platinum Program.

Notional Funds are funds not actually held in the account, but which have been "promised" by a client, in writing, to the trading activity of the account. The total amount of notional funds and actual funds in a client's account are considered the "Nominal Account" size which the Advisor will base its trading decisions. The Advisor places trades and manages Client accounts based upon the Nominal Account size of \$70,000 for the Strategic Growth: Elite Program and \$104,000 for the Strategic Growth: Platinum Program regardless of profits and losses in the account. In order to increase the Nominal Account size, Clients would need to add funds in increments of \$7,000 for the Strategic Growth: Elite Program and \$13,000 for the Strategic Growth: Platinum Program.

For the Strategic Growth: Elite Program, should the net liquidating value of a Client's account at its Futures Commission Merchant fall below \$70,000 or rise above \$70,000, notional funds would be created. In fact, the amount of notional funds in an account would fluctuate as profits and losses are incurred.

Clients should be aware that trading with notional funding increases leverage, which has the effect of magnifying gains or losses, when calculated as a percentage of the actual cash in an account. Realized gains and losses in an account are always applied to the cash balance in the account, not to notional equity.

Special Performance Disclosure for Notionally Funded Accounts

All clients should request the Advisor to advise them of the amount of actual cash deposited in the margin account that should be deposited to the Advisor's trading Programs for the account to be considered "Fully-Funded". This is the amount upon which the Advisor will determine the number of contracts traded in their account and should be an amount sufficient to make it unlikely that any further cash deposits would be required from them over the course of their participation in the Advisor's Programs. You are reminded that the account size you have agreed to in writing (the "nominal account" size) is not the maximum possible loss that your account may experience. You should review the account statements received from your FCM in order to determine the actual activity in your account, including profits, losses and current cash equity balance. To the extent that the equity in your account is at any time less than the nominal account size you should be aware of the following:

- 1. Although your gains and losses, fees and commissions measured in dollars will be the same, they will be greater when expressed as a percentage of the actual account equity shown in the account.
- 2. You may receive more frequent and larger margin calls.

Notional Funding Performance Matrix

The following matrix is intended to enable a prospective client to convert any indicated Fully-Funded Rate of Return to an equivalent Rate of Return at the various funding levels of the Advisor's Program.

RATE OF										
RETURN ⁽¹⁾	RATES OF RETURN BASED ON VARIOUS FUNDING LEVELS $^{(3)}$									
50.00% (High)	50.00%	55.55%	62.50%	71.43%	83.33%					
10.00%	10.00%	11.11%	12.50%	14.29%	16.66%					
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
-10.00%	-10.00%	-11.11%	-12.50%	-14.29%	-16.66%					
-50.00% (Low)	-50.00%	-55.55%	-62.50%	-71.43%	-83.33%					
	100.00%	90.00%	80.00%	70.00%	60.00%					
LEVEL OF FUNDING ⁽²⁾										

Notes: (1) Represents a range in potential rates of return.

(2) Represents five levels of funding.

(3) Represents rate of return on actual assets in the account for different levels of funding.

PRINCIPAL RISK FACTORS

In addition to the risks inherent in trading commodity interests, other risk factors exist, including those described below, in connection with a client participating in the Programs. Prospective clients should consider all of the risk factors described below and elsewhere in this Disclosure Document before participating in the Advisor's Programs:

<u>A Participating Client's Futures Commission Merchant May Fail:</u> Clients are free to choose to open their accounts at any Futures Commission Merchant of their choice. However, if the Client does not choose an FCM, then the account will be opened with Straits Financial LLC as the Advisor has a relationship with Straits Financial LLC. Under CFTC Regulations, the FCM is required to maintain client funds in a segregated account. If the FCM fails to do so, the client may be subject to a risk of loss of funds on deposit in the event of bankruptcy. In addition, under certain circumstances, such as the inability of another customer's account to satisfy a margin call, the client may be subject to a risk of loss of its funds on deposit with the FCM, even if such funds are properly segregated. In the case of any such bankruptcy or customer loss, the client might recover, even in respect of property specifically traceable to the client, only on a pro-rata share of all property available to all of the FCM's customers. It is possible that a client may not be able to recover any of his funds.

<u>Commodity Futures Trading is Speculative and Volatile:</u> Commodity prices are highly volatile. Historically, prices for commodity futures contracts were highly volatile at times (i.e., prices either increase or decrease rapidly based upon various occurrences). Price movements of financial futures contracts are influenced by, among other things, government, fiscal and monetary programs and policies, national and international political and economic events, and changes in interest rates. None of these factors can be controlled by the Advisor and no assurance can be given that the Advisor's advice will result in profitable trades for a participating client or that a client will not incur substantial losses.

<u>Commodity Futures Trading is Highly Leveraged:</u> The low margin deposits normally required in commodity futures trading permit an extremely high degree of leverage. The higher the leverage the higher the risk. The Trading Advisor employs a subjective approach to determine the client's leverage based upon the size of the account and current market conditions. A relatively small price movement in a commodity futures contract may result in immediate loss, in excess of the amount invested, or profit to the investor. Under the Advisor's Strategic Growth: Elite Program, the average amount of funds invested for margin purposes at one time will generally be approximately 15% to 30% (for the Advisor's Strategic Growth: Platinum Program approximately 10% to 20%) of the nominal trading level (which is the trading level used by the Advisor to determine which trades to execute), however, the percentage may be substantially higher or lower based upon the current market conditions.

<u>Commodity Futures Trading May Be Illiquid:</u> Most United States commodity exchanges limit fluctuations in commodity futures contract prices during a single day by regulations referred to as "daily price fluctuation limits" or "daily limits." The Trading Advisor only conducts trading on the Chicago Board of Trade ("CBOT"). In the past, futures prices may have

reached the daily price limit for the commodity futures traded by the Advisor. During a single trading day, no trades may be executed at prices beyond the daily limit. Once the price of a futures contract for a particular commodity has increased or decreased to the limit point, positions in the commodity can be neither taken nor liquidated unless traders are willing to effect trades at or within the limit. Commodity futures prices have occasionally moved the daily limit for several consecutive days with little or no trading. Similar occurrences could prevent the client from promptly liquidating unfavorable positions and subject the client to substantial losses, which could exceed the margin initially committed to such trades. Under very unusual circumstances, the client may be required to accept or make delivery of the underlying commodity if the position could not be liquidated prior to its expiration date.

<u>Clients Personally Liable for Losses in Their Accounts:</u> Clients are directly and personally liable for the losses in their trading account. Potential loss is by no means limited to the amount of assets which the Client deposited into the trading account. For example, in a market in which the Advisor is unable to liquidate positions, the Client could lose well in excess of the maximum amount that was committed in the trading account.

<u>**Commissions:**</u> Frequent trading in an account by the Advisor could make it more difficult to achieve profits since gross commissions charged can substantially deplete profits.

<u>Speculative Nature of Commodity Trading:</u> Commodity futures contracts, unlike many securities, do not pay any dividends or interest. Profits can be made in commodity trading only by selling a contract at a higher price than that at which it was bought or by buying a contract at a lower price than at which it was sold.

<u>Charges to a Client's Account:</u> A Client is obligated to pay brokerage commissions, management fees, and exchange and NFA fees, regardless of whether the Client realizes profits.

<u>Changes in Trading Approach</u>: No assurance is given that the Advisor's performance will result in successful trading for clients under all or any conditions. The Advisor may alter its trading methods, commodity futures traded, or money management principles, without prior approval by, or notice to clients, if the Advisor determines that such change in policy is in the best interest of clients. However, all material changes to the Programs will be communicated to clients within twenty-one days of the change.

Futures Trading is non-Correlated to other Asset Classes: Generally, assets invested in futures accounts have been non-correlated to the performance of other investment asset classes such as stocks and bonds. As a result of this non-correlation, a futures account managed by the Advisor should not be expected to automatically profit during unfavorable periods or vice versa. The futures markets are fundamentally different from other markets, therefore, making any comparison inherently limited.

Notionally Funded Accounts: Notional Funds are funds not actually held in the account, but which have been "promised" by a client, generally in writing, to the trading activity of the account. The total amount of notional funds and actual funds in a client's account are considered the "Nominal Account" size which the Advisor will base its trading decisions. Therefore, Notional

funding allows a client to trade the account at a level higher than the cash actually held in the account. Notional equity creates additional leverage in an account relative to the cash in such account. This additional leverage results in a proportionally greater risk of loss (and opportunity for gain). While the possibility of losing all the cash in an account is present in all accounts, accounts that contain notional equity have a proportionately greater risk of loss.

Electronic Order Entry: The Advisor may place trades via electronic order platforms for its Programs. In such instances, trading through an electronic trading or order routing system exposes you to risks associated with system or component failure. The risk exists that a trade may not be placed, a trade may be placed at a later time than originally desired, or a trade may not be able to be cancelled. These occurrences, which are beyond the Advisor's control, could result in losses to a client's account.

Stop Orders: The Advisor may use "Stop Loss" or "Stop Limit" orders. A prospective client should be aware that placing such orders will not necessarily limit losses to the intended amounts since market conditions may make it impossible to execute such orders at the requested price.

<u>Services of the Advisor's Principal:</u> The Advisor is dependent on the services of Jason Peregrine, the sole trading principal. If the services of Mr. Peregrine were not available, or were interrupted, the continued ability of the Advisor to render services to clients would be subject to substantial uncertainty, and such services of the Advisor could be terminated completely.

Speculative Position Limits: The CFTC and the commodity exchanges have established limits on the maximum net long or net shorts futures positions which any person or group of persons acting together may hold or control. Any commodity accounts managed by the Advisor, or owned by the Advisor or its principal, must be combined for position limit purposes. The Advisor believes that the current limits will not adversely affect its trading. However, it is possible that the Advisor's trading decisions may have to be modified and positions held by Clients may have to be liquidated in order to avoid exceeding such limits.

<u>Competition</u>: The Advisor engages in investment and trading activities that are highly competitive with other investment and trading programs. The Advisor competes for trades with mutual funds, investment banks, broker/dealers, commercial banks, insurance companies, pension funds and other financial institutions, all of which may have investment objectives similar to the Advisor's and substantially greater resources or experience than the Advisor.

<u>Uncertainty Concerning Future Regulatory Changes</u>: In addition to possible changes in the regulation of the commodity futures markets, other regulatory changes could have a material and adverse effect on the prospects for profitability. The commodity futures markets are subject to ongoing and substantial regulatory changes, and it is impossible to predict what statutory, administrative, or exchange-imposed restrictions may become applicable in the future.

Diversification: The Advisor's Programs are not diversified amongst asset classes such as stocks, bonds, real estate, etc. and only trades December Futures Corn contracts on the Chicago Board of Trade so it does not diversify into any other commodity/futures complexes. Such a lack of diversification could result in significant losses.

Incentive Fee: The Advisor's entitlement to an incentive fee may cause it to take greater risks in its investing than it would if its only compensation was a management fee and/or commissions.

The Advisor receives incentive fees on a monthly basis. An incentive fee may be made even though the trading results for a longer time period may be unprofitable. Once an incentive fee is made, the Advisor retains the allocation regardless of subsequent performance.

Trading in Options on Commodity Futures: The Advisor generally does not trade options on futures; however, the Advisor may enter into options on futures trading if market conditions warrant for potential profitability or to provide additional risk management. Options trading involves risks substantially similar to those involved in trading commodity futures contracts in that options are speculative and highly leveraged. Option prices are very volatile and influenced by many of the same factors as futures contracts. A seller of an option is subject to the risk of loss resulting from the difference between the premium received and the price of the underlying futures contract which the seller must purchase or deliver upon exercise of the option. Option sellers have unlimited risk. The purchaser of an option may lose his/her entire premium plus commissions and fees. Moreover, the ability to invest in or exercise options may be restricted in the event that trading on U.S. commodity exchanges is restricted by either the CFTC or any such exchange.

THE FOREGOING LIST OF PRINCIPAL RISK FACTORS DOES NOT PURPORT TO BE A COMPLETE EXPLANATION OF THE RISKS INVOLVED IN THE ADVISOR'S PROGRAMS. POTENTIAL INVESTORS SHOULD READ THIS ENTIRE DISCLOSURE DOCUMENT BEFORE DECIDING TO INVEST IN THE PROGRAMS.

BROKERAGE ARRANGEMENTS

Futures Commission Merchants

To hold money and trade for the account of another, a person must be registered with the Commodity Futures Trading Commission ("CFTC") as a clearing or non-clearing Futures Commission Merchant ("FCM") and must be a Member of NFA. Accordingly, clients will be required to have, or to open an account with, an FCM prior to commencing activities with the Advisor. Clients are free to choose the FCM of their choice. However, if a Client does not choose an FCM of choice, then Clients' accounts will be opened at Straits Financial LLC ("Straits") as the Advisor, in its capacity as a registered introducing broker, operates pursuant to a guarantee agreement with Straits.

Straits is a Commodity Futures Trading Commission (CFTC) licensed registered Futures Commission Merchant (FCM) since March 16, 2011, a Swap Firm Approved since May 2, 2013, a Forex Firm Approved since July 23, 2020, and a Member of National Futures Association (NFA) since March 16, 2011. On October 2, 2024, Straits became registered as a Forex Dealer Member.

Straits is a full clearing member of the Chicago Mercantile Exchange (CME), the Chicago Board of Trade (CBOT), the New York Mercantile Exchange (NYMEX), the Commodity Exchange (COMEX), the Options Clearing Corporation (OCC), the CBOE Futures Exchange (CFE), and the Dubai Mercantile Exchange (DME). All of Straits' assets and capital are devoted to its FCM operations which includes execution, brokerage, and clearing of futures contracts and options thereon. The Designated Self-Regulatory Organization of Straits is Chicago Mercantile Exchange.

Straits is owned by US-based holding company, Straits (USA) Inc., a subsidiary of Straits Financial Group Pte. Ltd. which is the brokering division of CWT International Limited, a publicly traded company located in Hong Kong.

Straits charges commissions, clearing and exchange fees, and NFA fees on the commodity interest transactions. These charges are reflected on the daily confirmations and purchases/sales statements sent to the client. A participating client is directly responsible for the payment to the FCM of all margins, brokerage commissions and fees incurred in connection with transactions effected for such client's account. A client will be required to pay brokerage commissions regardless of the account's profitability.

Introducing Brokers

The Advisor is also registered as an introducing broker that is guaranteed by Straits Financial LLC. As a guaranteed introducing broker, all introduced customer accounts must be carried and cleared at Straits.

Other

In addition to the execution of the Advisor's account documentation, each Client will be required to execute various FCM account forms for new customers such as a power-of-attorney, risk disclosure document, authorization to cross trade transactions, and the FCM customer agreement.

ADVISOR'S FEES

Upfront Fee

The Advisor will not charge an upfront fee upon the opening of client accounts.

Management Fee

The Advisor does not charge a management fee in the Strategic Growth: Elite Program, but does charge a management fee in the Strategic Growth: Platinum Program.

The Advisor, as compensation for advisory services, will charge a monthly management fee of up to 1/12th of 2% (2% per annum) of "Assets under Management" at the beginning of each month. "Assets under Management" is defined as the nominal account size which the Advisor bases its trading decisions (i.e., determines the number of trades to execute), and which remains constant unless changed via written agreement signed by the Client and acknowledged by the Advisor. The nominal trading level is not increased by additions or profits, and is not decreased by withdrawals or losses. Additions and withdrawals during the month are pro-rated for management fee calculations.

Management fees are charged regardless of the profitability in the client's account and are calculated prior to incentive fees.

The Advisor accepts accounts that are notionally funded. Notional Funds are funds not actually held in the account, but which have been "promised" by a client, in writing, to the trading activity of the account. The total amount of notional funds and actual funds in a client's account are considered the "Nominal Account" size which the Advisor will base its trading decisions. A client's monthly management fee will be calculated on "Assets under Management", as defined above, which means that the nominal account value will be used. As a result, a client's management fee as a percent of actual funds may be determined by dividing the management fee computed on assets under management by the actual funds in the account. For example, using an annual management fee rate of 2%, an account which is funded 50% with actual funds (e.g., \$50,000) and 50% with notional funds (e.g., \$50,000), for total assets under management/nominal trading level of \$100,000, will be charged a management fee of \$2,000 on an annual basis (\$100,000 X 2%). As a result, the management fee as a percent of actual funds is 4% (\$2,000/\$50,000).

The Advisor may share a portion of its management fees with third parties in accordance with regulatory standards.

Incentive Fee

The Advisor does not charge an incentive fee in the Strategic Growth: Elite Program, but does charge an incentive fee in the Strategic Growth: Platinum Program.

The client will pay the Advisor a monthly incentive fee, of up to 20% based on New Net Trading Profits for the month. The incentive fee will be calculated and accrued on a monthly basis for net performance and rate of return purposes. New Net Trading Profits for the month shall include: (i) the net of realized profits and losses on futures and options positions (i.e., less commissions, clearing fees, exchange fees, brokerage fees, give-up fees, and NFA fees) resulting from all trades closed out during the month, plus (ii) the change in unrealized profit or loss on open futures and open options trades as of the close of the month as compared to the prior month end; minus: (i) the change in accrued commissions on open trades as of the close of the month as compared to the prior month end, (ii) the monthly management fees, and (iii) other expenses incurred during the month directly relating to the trading profits must overcome cumulative Net Trading Losses carried forward from prior months. For example, if the Advisor had Net Trading Losses from the prior month and Net Trading Profits for the current month, the Advisor would combine the Net Trading Profits and Losses for the two months to determine the base of the incentive fee.

All open futures positions in a client's account are calculated at their fair market value at the end of each business day and at the end of the month. The market value of an open position is determined by the settlement price as determined by the exchange on which the transaction is completed, or the most recent appropriate quotation provided by the FCM as supplied by the exchange. If any payment is made to the Advisor with respect to New Net Trading Profits experienced by the account, and the account thereafter incurs a net loss for any subsequent month, the Advisor will retain the amount previously paid with respect to such New Net Trading Profits regardless of whether any New Net Trading Profits were/are earned.

Losses shall be carried forward from the preceding Periods and not carried back. If Trading Profits for a period are negative (thus a Trading Loss), it shall constitute a "Carryforward Loss" for the beginning of the next period. If a client withdraws funds from the account at a time when the account has a Carryforward Loss, the Trading Loss that must be recovered before there will be New Net Trading Profits will be reduced. The amount of the reduction will be determined by dividing the value of the account immediately after such withdrawal by the value of the account immediately before such withdrawal and multiplying that fraction by the amount of the unrecovered Trading Loss at the time of the withdrawal. If Trading Losses occur in more than one calendar month in the account without an intervening payment of an incentive fee, and the value of the account is reduced in more than one calendar month because of withdrawals, then the Trading Loss in each such calendar month shall be reduced in accordance with the above formula, and only the reduced amount of Trading Loss will be carried forward to offset future Trading Profits.

The Advisor may share a portion of its incentive fees with third parties for capital introduction, in accordance with regulatory standards.

Commissions

The Advisor does not share in commissions charged to Clients' accounts in the Strategic Growth: Platinum Program. In the Strategic Growth: Platinum Program, round turn commissions are approximately \$5. However, in the Strategic Growth: Elite Program, as compensation for advisory services, the Advisor charges a \$50 per round-turn commission (\$25 will be deducted from the Client account upon entering a trade and \$25 will be deducted upon exiting a trade). It is estimated that the FCM will retain approximately 10% of the commissions and the Advisor approximately 90%.

In addition to commissions, Clients will be charged clearing and exchange fees, and NFA fees.

Although no current agreements exist, the Advisor may share a portion of its commissions with third parties for capital introduction, in accordance with regulatory standards.

CONFLICTS OF INTEREST

Prospective clients should be aware that these, and other, potential conflicts of interests are frequently inherent in the position occupied by a CTA. Clients should be aware that normal marketplace factors may cause the results of various accounts to differ.

Speculative Position Limits: The Advisor may trade commodity futures for its own account. The Advisor's principal trades commodity futures for his own account. The trades in these accounts may compete with a client's account for the same or similar positions in the commodity markets. The Advisor expects to manage the commodity accounts of various clients. All of these accounts plus the accounts of the Advisor and the Advisor's principal will be combined for purposes of speculative position limits (restrictions imposed by U.S. commodity exchanges and the CFTC on the size of the commodity positions that a person may hold or control), so that the number of commodity positions that the Advisor establishes for any one client may be restricted by the number of positions held for these other accounts. Also, these other accounts might compete with a client's account for the same or similar positions in the commodity markets. To the extent that position limits restrict the total number of positions that the Advisor may establish for any one client and those of other accounts, the Advisor will allocate commodity transaction orders equitably between the client's account and such other accounts on a pro-rata basis, if possible. If pro rata allocation is not possible, then the Advisor will rotate the accounts that receive fills. The Advisor and/or the Advisor's principal may receive a fill price and the client may not.

Investments in Other Accounts: The Advisor may have investments in other accounts, which could create an incentive to favor those accounts over any one client's account. Although no such favoritism is intended or expected to occur, there can be no assurance that the performance of the proprietary accounts will be similar to those of a client's account.

Testing New Trading Concepts: The Advisor and/or its trading principal may, at times, test new trading concepts and techniques in their own accounts. As such, trading in these accounts may be more aggressive than client accounts, trading in these accounts may involve trades which are opposite to clients' trades, and trading proprietary accounts may create an incentive to trade ahead or against client accounts.

<u>**Time Management**</u>: The Advisor intends to continue to actively solicit and manage other client accounts The Advisor may have conflicts of interest in allocating management and advisory time, services, and other functions.

<u>Third Party Account Raisers</u>: The Advisor may pay people or firms who introduce accounts to the Advisor, a portion of the fees the Advisor receives from such accounts. As a result, persons or firms that introduce your account to the Advisor may have an incentive to do so based on the payments they will receive from the Advisor and not necessarily on how the Advisor's Programs fits into the client's overall investment objectives.

Bunched Orders/Partial Fills: The Advisor will generally place orders in a fashion generally known as "bunched orders". With this type of trading method, the Advisor will combine the order for one client along with the orders of other clients as well as for the accounts of the

Advisor, the Advisor's principal, and/or affiliates of the Advisor or Advisor's principal, and place the entire order simultaneously as one trade. In this manner of trading, the Advisor attempts to trade client accounts in parallel, making trades for accounts and apportioning the number of each commodity interest ratably among the accounts based on the equity in each account. In the event of a partial fill, allocations will be made on a pro-rata basis. Each client would receive, if possible, a portion of the bunched order. If pro rata allocation is not possible, then the Advisor will apportion the fill using the high to low method. This method begins apportioning the higher fill prices to the higher account numbered clients for both buys and sells, and apportioning the lower fill prices to the lower account numbered clients for both buys and sells until the entire fill is allocated. In the event a partial fill occurs, the Advisor's accounts could receive a position and a client's account could not.

Bunched Orders/Split Fills: In the event a bunched order results in a split fill (i.e., more than one price), the Advisor attempts to have the trade apportioned according to the average price system ("APS") so that each customer receives the same fill price. In the event APS is not available, the Advisor's procedure for allocating bunched orders resulting in split fills will be accomplished pursuant to a high-low method. This method apportions the higher fill prices to the higher account numbered clients for both buys and sells, and the lower fill prices to the lower account numbered clients for both buys and sells. This method is one of the industry standards and results in a fair and equitable method of order allocation. Any accounts of the Advisor, its principal, or affiliates of the Advisor or the Advisor's principal would take the worst fill price.

Proprietary Trading: The Advisor may trade proprietary futures accounts. The Advisor's principal trades futures for his own personal account. Trading in such accounts may be based upon similar or identical strategies employed by the Advisor for clients. Orders for such accounts may be entered in advance of orders for clients for legitimate reasons (e.g., a higher level of trading risk, a different trading program, etc.). Furthermore, the Advisor is obligated to use its best efforts to provide clients investment opportunities consistent with their investment objectives; however, the Advisor is not required to present to the trading Programs every investment opportunity that comes to its attention and therefore clients may not be given the opportunity to participate in certain investments made by the Advisor or its principal. There is the potential for these accounts to trade ahead or against client accounts and may receive preferential treatment.

<u>**Commissions</u>**: In the Strategic Growth: Elite Program, the Advisor shares in the commissions charged to the clients' accounts. As such, the Advisor has an incentive to trade accounts more actively, thereby increasing commission income. Furthermore, frequent trading in an account by the Advisor could make it more difficult to achieve profits since gross commissions charged can substantially deplete profits.</u>

Futures Commission Merchant ("FCM"): The Advisor is a guaranteed introducing broker of Straits Financial LLC ("Straits"). The Advisor sets the Client's commission rate for Clients that choose to open their account with Straits. If a client opened an account with an FCM other than Straits, establishing a lower commission rate may be possible, or a different FCM could be in the best interest of a Client based upon operational considerations.

LITIGATION

There have been no material civil, administrative, or criminal actions, pending, concluded or on appeal against the Advisor or its principal in the last five years.

There have been no material civil, administrative, or criminal actions, pending, concluded or on appeal against Straits Financial LLC or its principals in the last five years.

PAST TRADING PERFORMANCE

Jason Peregrine, the sole trading principal has not previously directed any accounts.

The performance presented in the following Capsule represents the trading results for accounts traded pursuant to power of attorney provided to the Advisor under the December Corn Clip Program which is now the Advisor's Strategic Growth: Elite Program. The performance is net of commissions charged at approximately \$50 on a round turn basis. The performance results are also net of all clearing, exchange, brokerage, and NFA fees. No management or an incentive fee were charged to the accounts. The TRADING PROGRAM described in this document on page 5 was used to make all trading decisions.

The monthly performance returns were compiled by an independent third-party consulting firm, Compliance Supervisors International Inc., located in Keyport, New Jersey, utilizing customer month end statements obtained directly from the FCM. In the opinion of the Advisor, the returns are accurate and fairly stated in all material respects.

Since past performance is not necessarily indicative of future results, the results set forth herein may not be indicative of the results that may be achieved by the Advisor in the future. No representation is being made that any account will or is likely to achieve profits or incur losses similar to those shown.

The unaudited Rates of Return represented and all performance data relating to the Rates of Return have been calculated on an accrual basis of accounting in accordance with Generally Accepted Accounting Principles, Commodity Futures Trading Commission Regulations, and National Futures Association Rules.

Upon request, the Advisor will make available to prospective and existing clients, a composite performance table in columnar format, which includes at a minimum, beginning equity, additions, withdrawals, net performance, ending equity, and rate of return.

PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

	<u>Jan</u>	Feb	Mar	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	Oct	Nov	Dec	<u>YTD (1)</u>	
2023												8.43%	8.43%	
2024	13.70%	22.76%	-9.13%	-6.88%	12.96%	38.54%	-19.30%	02%					52.64%	
Trading Advisor: Trading Program: Inception of Trading for the Advisor: Funds began trading in Program:								Peregrine Commodities LLC Strategic Growth: Elite Program (Formerly the December Corn Clip Program) December 1, 2023 December 1, 2023						
Total Number of Accounts: Number of Accounts in this Capsule:								19 19						
Total Nominal Assets under the Advisor's Management: Total Nominal Assets in this Capsule:								\$2,118,000 \$2,118,000						
Accounts opened and closed in Program with positive performance: Range in returns accounts opened/closed with positive performance: Accounts opened and closed in Program with negative performance: Range in returns accounts opened/closed with negative performance:								e: 39.15% e: 0						
Worst Monthly Drawdown (2): Worst Peak to Valley Drawdown (3):										ıly 2024 ıly 31, 20)24 to Au	1gust 31, 202	.4	

- (1) Year to Date represents the cumulative rate of return for each year or portion of the year presented. It is computed by adding the respective Monthly Rate of Return beginning with the first month of that year. The calculation does not assume a continuous investment throughout the period as the beginning nominal trading level remains constant each month.
- (2) Draw-Down is defined as losses experienced by an account or trading program over a specified period.
- (3) Worst Peak-to-Valley Draw-Down is defined as the greatest cumulative percentage decline in month end net asset value due to losses sustained by a trading program during any period in which the initial month-end net asset value is not equaled or exceeded by a subsequent month-end net asset value.
- (4) Monthly rates of return are calculated pursuant to the Only Accounts Traded Method ("OAT"). Under this method, rates of return are computed by dividing the aggregate net performance by the aggregate beginning equity for only those accounts which traded during the entire month and which had no material additions or withdrawals. It excludes new accounts, accounts that were open for only part of the month, and accounts which had material (i.e., 10% or more of beginning equity) additions or withdrawals, and other factors that may possibly distort rate of return.

SUPPLEMENTAL PAST TRADING PERFORMANCE

The performance presented in the following Capsule represents the actual trading results for Peregrine Commodities LLC as depicted in the performance capsule under PAST TRADING PERFORMANCE on page 19. However, the following returns have been adjusted for monthly pro-forma management fees, incentive fees, and commissions. The pro-forma adjustments have been made to demonstrate what the actual rates of return would have been given the current fee structure in the Strategic Growth: Platinum Program. The current fee structure in the Strategic Growth: Platinum Program is a monthly management fee of 1/12th of 2%, a monthly incentive fee of 20% of new net profits, and round turn commissions of approximately \$5. The Strategic Growth: Elite Program (formerly the December Corn Clip Program) does not charge any management or incentive fee but does charge commissions at approximately \$50 per round turn trade.

PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

	<u>Jan</u>	Feb	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	Oct	Nov	Dec	<u>YTD (1)</u>	
2023												7.29%	7.29%	
2024	11.17%	18.76%	-6.14%	-7.04%	13.58%	30.94%	-16.73%	0.65%					45.18%	
Trading Advisor:									ne Comn					
Trad	ing Prog	ram:										(Formerly th		
												ith pro-form		
												ns would hav		
Inco	ation of 7	Frading fo	with a Ad	vicor				under the Strategic Growth: Platinum Program December 2023						
-	•	trading in							ber 2023					
1 une	is oegan	trading in	Tiogram	1.				Decem	501 2025					
Tota	l Numbe	r of Acco	unts:					19						
Num	ber of A	ccounts ir	n this Ca	psule:				19						
T	1	1.4						#3 110	000					
		al Assets u			r's Manag	gement:		\$2,118,000						
Tota	I Nomina	al Assets i	in this Ca	apsule:				\$2,118,000						
Acco	ounts ope	ened and c	closed in	Progran	n with pos	sitive perf	ormance:	1						
Accounts opened and closed in Program with positive performance: Range in returns accounts opened/closed with positive performance:								: 36.39%						
Accounts opened and closed in Program with negative performance:														
Range in returns accounts opened/closed with negative performance:								e: Not Applicable						
Wors	st Month	ly Drawd	own (2):					-16.73%	6 Ju	ly 2024				
Worst Peak to Valley Drawdown (3):										•	24 to July	31, 2024		
(1) Year to Date represents the cumulative rate of return for each year or portion of the year presented. It is computed by adding the respective Monthly Rate of Return beginning with the first month of that year. The calculation does not assume a continuous investment throughout the period as the beginning nominal trading level remains constant each month.										nat				

- (2) Draw-Down is defined as losses experienced by an account or trading program over a specified period.
- (3) Worst Peak-to-Valley Draw-Down is defined as the greatest cumulative percentage decline in month end net asset value due to losses sustained by a trading program during any period in which the initial month-end net asset value is not equaled or exceeded by a subsequent month-end net asset value.
- (4) Monthly rates of return are calculated pursuant to the Only Accounts Traded Method ("OAT"). Under this method, rates of return are computed by dividing the aggregate net performance by the aggregate beginning equity for only those accounts which traded during the entire month and which had no material additions or withdrawals. It excludes new accounts, accounts that were open for only part of the month, and accounts which had material (i.e., 10% or more of beginning equity) additions or withdrawals, and other factors that may possibly distort rate of return.

OPENING AN ACCOUNT

The FCM will provide each Client with account documentation necessary to establish the Client's account at the FCM.

The Advisor only trades December Corn Futures Contracts. Trading starts in November of the previous year. As such, Clients should be able to invest funds in the Advisor's Programs for a period of at least one year, although Clients may remove funds from their account at any time. As with any investment, profits as well as losses in commodity trading can and will occur. The Programs are therefore only for those clients who are able to both appreciate and bear the financial risks described in this disclosure document.

The Programs are not intended for investors seeking short-term results because the Advisor will manage a client's account with the objective of long-term capital appreciation and therefore a suggested minimum time horizon of three years or more would be most appropriate to allow the Programs to trade in a diverse range of market cycles and volatility.

The Advisor's Program requires a minimum investment of \$70,000 for the Strategic Growth: Elite Program, and \$104,000 for the Strategic Growth: Platinum Program. Generally, there is no maximum amount of funds the Advisor can manage for its clients pursuant to the Programs.

BEFORE SIGNING ANY AGREEMENTS WITH THE ADVISOR, YOU SHOULD CAREFULLY READ THIS ENTIRE DOCUMENT AND DISCUSS WITH THE ADVISOR THE VARIOUS RISKS WITH TRADING COMMODITY FUTURES.

ADDITIONS AND WITHDRAWALS TO EXISTING ACCOUNTS

Clients are free to withdraw their funds at any time. However, the Advisor recommends that if clients desire to withdraw capital from their accounts that ten business days advance written notice is provided in order that the Advisor may adjust the trading account accordingly (i.e., exit any existing trades in the account). If the Client does not provide advance notice, the Client's account could suffer unanticipated losses.

The Advisor requires that the Client does not withdraw funds below the initial amount invested for trading (i.e., \$70,000 for the Strategic Growth: Elite Program, or \$104,000 for the Strategic Growth: Platinum Program). If a Client makes a withdrawal of funds that brings the Client's account value below the initial amount invested for trading, the Advisor has the right to cease trading the Client's account.

If a client expresses an interest in the Advisor to continue trading the account even at a Nominal Trading Level that has fallen below the minimum trading level due to a withdrawal by the Client, the Client should understand that trading gains or losses in the Client's account can be significantly greater than those in the accounts that have met the minimum investment requirement. Furthermore, the Advisor may not be able to trade accounts under the minimum required investment amount similarly to those over the minimum requirement and therefore, the performance in the smaller accounts can be significantly different than the accounts that met the minimum investment requirements. As a result, such accounts may be kept separate from the larger accounts for reporting performance purposes. In the event separate capsules are warranted, Clients should not compare the performance between the capsules because account sizes and costs may be different and as a result, performance may vary.

The Client may add capital to the Account at any time, but it would be prudent to first obtain the prior approval of the Advisor of any such intended action.

For the Strategic Growth: Elite Program, \$70,000 (and for the Strategic Growth: Platinum Program, \$104,000) is required in actual funding to trade a Client's account. Clients should note that any additional actual cash additions to the account as well as any profits made in the account will not increase the Nominal Account Size (which is the trading level used by the Advisor to determine which trades to execute, i.e., \$70,000 or \$104,000). As such, any actual funds above the \$70,000 or \$104,000 will not be used in the determination of the account management. Actual cash withdrawals made from the account as well as any losses incurred in the account will not reduce the Nominal Account Size (which is the trading level used by the Advisor to determine which trades to execute, i.e., \$70,000 or \$104,000). The Advisor bases trading decisions on a fixed nominal account size (i.e., \$70,000 or \$104,000). In the event actual funds in the account fall below \$70,000 or \$104,000, the Advisor continues to trade the account as \$70,000 or \$104,000. Therefore, additional leverage would be created. This additional leverage results in proportionately greater risk of loss.

The Nominal Account Size (i.e., \$70,000 or \$104,000) may only be changed through a written agreement signed by both the Client and the Advisor.

TAX ASPECTS

The laws relating to the taxation of commodities and futures are too complex to be dealt with in this Disclosure Document. Prospective investors should consult with their own tax advisor.

PRIVACY POLICY

The confidentiality of client information is of the utmost importance to the Advisor.

The Advisor collects nonpublic personal information about its clients from information provided by the clients on account applications and forms and through transactions that occur in the clients' trading accounts.

The Advisor does not disclose any nonpublic personal information about its clients to anyone, except as permitted or required by law. At times, the Advisor may be required to furnish complete client records to regulators, legal counsel, courts of competent jurisdiction, or other entities as required by law. In addition, the Advisor may be required to furnish tax information to the Internal Revenue Service.

The Advisor enters into agreements with external compliance/accounting firms to compile performance data for the Advisor's Trading Programs. The performance calculations are required to be compiled in accordance with CFTC Regulations and NFA Rules. The Advisor would provide clients' records (e.g., month end commodity statements generated by the FCM) to the external compliance firm for the purpose of compiling the performance data. The Advisor has obtained reasonable assurance that the external compliance firm will not share the clients' information with third parties.

The Advisor will not sell clients' personal information to anyone, and no client will be permitted to review other clients' records.

The Advisor maintains physical, electronic, and procedural safeguards to protect clients' nonpublic personal information.

ACKNOWLEDGMENT OF RECEIPT OF PEREGRINE COMMODITIES LLC'S **DISCLOSURE DOCUMENT**

Peregrine Commodities LLC 5626 NW 60th Street Kansas City, MO 64151 (816) 728-2459

I/we. acknowledge reading and fully , understanding the Peregrine Commodities LLC Disclosure Document dated September 21, 2024. I/we am/are aware of the risks involved with the Advisor's Trading Program and represent that I/we have sufficient risk capital.

For Entity Clients:

Client Name

By (Print Name)

Title

Authorized Signatory

Second Client Name (Joint Account)

Second Client Signature (Joint Account)

Date (Joint Account)

Client Name (Print)

For Individual/Joint Clients:

Date

Signature

Date