



TriOptima AB

Application for exemption from registration as a clearing agency (Form CA-1)

EXHIBIT D

(Revised November 26, 2025)

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Exhibit Request:

Attach as Exhibit D a list of persons who directly or indirectly, through one or more intermediaries, are controlled by, or are under common control with, the clearing agency and indicate the nature of the control relationship.

Response:

Attached as Exhibit D-1 is an updated ownership structure chart for TriOptima reflecting the completion of a transaction in which Osttra Group was acquired by funds and other vehicles controlled by KKR. The updated chart includes the entities under its control and the entities that immediately control it. The ownership structure reflected in the chart is part of a broader group of companies with additional indirect levels of upstream ownership. The legal names of certain entities changed following the transaction but the legal name for TriOptima is unchanged.

TriOptima AB has two branches – one in the UK and one in Singapore. Neither of these branches has any involvement with the services that could constitute clearing activities.

TriOptima AB also has four subsidiary companies:

- TriOptima North America LLC
- TriOptima UK Limited
- TriOptima Asia Pacific Pte Ltd
- OSTTRA Japan KK

Each of these four subsidiaries provides services to TriOptima AB in the form of client relationship management, sales and marketing activities. The purpose of the four subsidiaries is thus to provide global coverage for the services provided by TriOptima via the so-called "follow the sun" model. All clients of TriOptima services enter into contractual arrangements with TriOptima AB only.