

CME Clearing & Global Operations Summary of Requirements and Guidelines for Clearing Event Contract Swaps and 24x7 Clearing October 2025

This document serves to outline the considerations and requirements that CME Group Clearing Members and clients must adhere to in order to clear event swap contracts. A document detailing 24x7 trading activity for Cryptocurrency futures and options on futures will be provided at a later date. In the event of any conflict between the Guidelines and the CME Rules, the CME Rules prevail.

24x7 Trading ("Supplemental Trading Hours") Overview

CME Clearing (or the "Clearing House"), in conjunction with the CME Group Exchanges, is planning to list certain event contract swaps for trading and clearing on a 24/7 basis. These products will trade continuously on CME Globex with at least a two-hour weekly maintenance period over the weekend. All holiday or weekend trading from Friday evening through Sunday evening will have a trade date of the following business day, with clearing, settlement and regulatory reporting processed the following business day. For the purposes of this document, Supplemental Trading Hours shall include, but are not limited to, the hours from 4:00 p.m. central time on Friday through 4:59 p.m. central time on Sunday ("Weekend Hours") and the hours, as determined by the Clearing House, that are impacted by amended trading hours for Exchange Holidays. Further, during certain hours within the Supplemental Trading Hours ("Advance Funding Hours") the Clearing House will monitor if a Clearing Member's exposure, as defined and published via an advisory by CME Clearing, during these hours exceeds, as applicable, the performance bond posted to the Clearing House by such Base Clearing Member and/or the available sources of liquidity, as determined by the Clearing House.

Since trades will have a date of the following business day, CME Clearing has established a framework whereby a Base Clearing Member's exposures during these hours will be managed relative to its performance bond posted to the Clearing House as of the most recent business day and its available sources of liquidity reported to the Clearing House, as applicable.

How it will work:

Certain contracts will be available for trading throughout the 7 day week, barring maintenance windows.

- There will be two weekly maintenance windows: 2 hrs Saturday & Tuesday mornings, (2 4am CT).
- CME Group reserves the right to communicate any other maintenance windows deemed necessary.
- There will still be only 5 Business Days; Monday Friday.
 - Each day, the Trade Date will switch over to the new Business Date (next logical Business Date) at 4pm CT. The market will close for one minute (from 4:00pm CT to 4:01pm CT) to accommodate this switch.
 - On Friday, the Business Date will switch to the next Business Date (i.e. Monday) at 4pm CT.
- Reference Data API will support 24/7 trading.
- No clearing settlement cycles will be run over the weekend.



- There will be an early Exercise & Assignment Cycle in the mornings, on Monday Friday, to account for events that have transpired since the previous cycle, including
 over the weekend.
- A Clearing Member must maintain risk management policies and procedures that are
 designed to limit instances, per origin, during Advance Funding Hours where its event
 contract swaps' exposure exceeds the performance bond it posts to the Clearing House
 (e.g., prefunded collateral on deposit). The event contract swaps' exposure of a given
 Clearing Member, per origin, is either the: i) performance bond required less any option
 premium due to be collected; or ii) the option premium due to be paid.
- Clearing Members must deposit collateral (Cash and/or any current collateral types currently accepted by the Clearing House) to cover weekend trading by Friday at 2pm CT
 - Collateral will be deposited into a separate weekend settlement account for each Clearing Member, per origin. These accounts will be suffixed with "ES".
 - On Sunday at 5:00pm CT, CME Clearing will sweep the collateral on deposit in the weekend settlement account back into the Clearing Member's regular (i.e., the settlement account utilized for business day activity that ends with an "E") settlement account, per origin.

Event Contract Swaps Overview

The Clearing House intends to clear event contract swaps that will be risk managed in the same manner as the existing event contracts launched in September 2022. The current event contracts and planned event contract swaps utilize a full value margin methodology, which is collected from the Clearing Member during normal clearing settlement cycles. In particular, for the seller of a contract, the full notional value is required as performance bond and the option premium is collected by the seller. For the buyer of a contract, the option premium is paid and the loss is limited to the premium paid. A detailed description of these swap contracts is included in Appendix A of this document.

Event Contract Swaps Classification and Treatment:

- All event contract swaps will behave like Binary Options with \$0 or \$1 payout. Min Tick = \$0.01, European Style Options.
- The positions will require full value margin.
- Event contract swaps that are not based on an underlying futures contract (i.e., Economic Indicator Swap-Based Event Contracts) are categorized as Swaps under CFTC regulations and require further operational considerations as detailed in the "Clearing Operations" section below.
- Trade Flow Example: Trade occurs at \$0.40
 - o Buyer pays & Seller collects \$0.40 premium. Seller deposits \$1 Initial Margin.
 - o If the event settles at \$1. Buyer collects, Seller pays \$1 Variation Margin. Seller \$1 Initial Margin is released.
 - o If the event settles at \$0. No Variation Margin is due. Seller \$1 Initial Margin is released.



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Considerations

CME Clearing Member Onboarding Requirements

For these initiatives there are two separate onboarding processes as it relates to existing Clearing Members. Firms that are not currently approved CME Clearing Members must go through the entire CME Clearing Member Onboarding and application process. Approved Clearing Members intending to clear the planned event contract swaps (those not based on underlying futures contracts) must get approval for Base OTC Derivative Membership in order to clear those products, if the firm is not already a Base OTC Derivative Member. Clearing Members seeking to clear any contracts during Supplemental Trading Hours must receive CME Clearing approval to do so. A general overview of each of the processes is included in the table below. Step-by-step detail is included in the "How-To" sections of this document.

Base OTC Membership (for Event Contract Swaps) & 24/7 Approval Process Overview				
	Firms not currently approved as a CME Clearing Member	Base OTC Derivative Membership	24/7 Trading Approval	
Approval Steps	Please reach out to clearingmembership@cmegroup.com to begin the onboarding process	 Intention Form Due Diligence/Operation al Review Credit & Liquidity Committee Approval 	1) Intention Form 2) Risk Questionnaire/Due Diligence Review/ Operational Review 4) Credit & Liquidity Committee Approval	

Clearing Risk Management

<u>Base OTC Clearing Membership:</u> Clearing Members seeking to clear the planned event contract swaps must affirm that the risk management program (e.g. policies, procedures and systems) currently utilized by the Clearing Member to support their current CME clearing membership will be utilized to support their OTC Derivatives (i.e. event based contract swaps) activity.

<u>Supplemental Trading Hours:</u> Clearing Members interested in clearing products during CME Clearing's Supplemental Trading Hours will be required to complete an Intention Form and Risk Questionnaire that is designed to address the considerations firms must take to clear products on weekends and CME Group Exchange holidays. Firms approved to clear during Supplemental Trading Hours must maintain risk management policies and procedures that are designed to limit instances, per origin, during Advance Funding Hours (e.g., Weekend Hours) where its event contract swaps' exposure exceeds the performance bond it posts to the Clearing House. The event contract swaps' exposure of a given firm, per origin, is either the: i) performance bond required less any option premium due to be collected; or ii) the option premium due to be paid.

On the last business day of the week, Clearing Members will be required to deposit funds to cover anticipated weekend activity. The funds will be deposited in separate weekend performance bond accounts.



<u>Margin for Event Contract Swaps:</u> Event contract swaps utilize a full value margin methodology. Since these contracts are full value margined, the buyer's loss is limited to the option premium paid and the seller's loss is limited to the full notional value of the contract (see Appendix A).

Financial and Regulatory Surveillance "FRS" COTC Reporting

The full value margin event contract swaps will be categorized as swaps under CFTC regulation, and as such, CME Clearing Members approved to clear these contracts will need to designate the positions and associated collateral in a distinct "cleared swaps customer" regulatory account class under Part 22 of CFTC Regulations.

JAC Regulatory Alert 12-03 (http://jacfutures.com/jac/jacupdates/2012/jac1203.pdf) provides a comprehensive overview of the regulatory reporting requirements for clients engaging in cleared swaps products. Key considerations include:

- Positions and collateral will need to be reflected in the clearing firm's books and records in "cleared swaps customer" accounts, and the clearing firm will be required to prepare a daily and monthly cleared swaps customer statement. Similar to segregation and secured 30.7 requirements, clearing members must maintain excess cleared swaps customer funds at all times.
- Firms are required to establish a Cleared Swaps Customer account with a CME approved depository institution, and must have an executed CFTC Acknowledgement Letter prior to clearing Event Contract Swaps.
- Analogous to the residual interest compliance calculation for segregation, the firm must perform a Legally Segregated Operationally Commingled ("LSOC") compliance calculation for the cleared swaps customer origin. However, unlike the 5:00 PM CST compliance deadline for the segregation and secured 30.7 residual interest calculations, Futures Commissions Merchants ("FCM")s must ascertain LSOC compliance prior to any end-of-day and intra-day payment cycle of initial and/or variation margin by the clearing house or a collecting FCM. If the clearing firm does not hold enough firm contributed assets to cover an LSOC margin deficiency, then the firm must deposit additional funds into a cleared swaps customer account to meet the shortfall before payment is made to Clearing or another FCM.

Clearing Operations & Banking

For Clearing Members intending to clear Base OTC Derivatives (event contract swaps) for customers, the contracts are subject to the customer protection regime for cleared swaps, specifically the LSOC regime, and these firms must be registered as FCMs. The "How-To" Section below details the account set up steps needed to comply with LSOC requirements.

Separate cleared swap bank accounts will need to be established with a CME approved settlement bank. CME Clearing will accept all approved acceptable collateral for Supplementary Trading Hours and Event Contract Swaps except for Letters of Credit and Gold Warrants.

FEC+ will be updated and made available to Clearing Members during weekend hours. Clearing Members will be able to log into FEC+ to view new trades that are entered during Supplemental Trading Hours.



Operational Technical Overview

Clearing Members wanting to use IBM MQ messaging will need to establish connectivity to CME's WAN infrastructure through one of the approved methods as described on https://www.cmegroup.com/solutions/market-access/globex/connectivity-options.html.

Those connections will need to accept the advertised subnets and allow connections to CME MQ listeners and from CME source IPs. For each environment there are two listeners and six source IPs. Only one listener per environment will be active/available at a time. The Firm will need to be able to connect to the active listener and re-connect if/when the active listener changes. Additional MQ information will be determined by CCS and CME MQ support.

UT Summary for MQ:

UT advertised subnets: <u>208.112.208.0/20</u>, <u>208.112.224.0/20</u> UT listeners: 208.112.208.7(1414), 208.112.224.7(1414)

UT source IPs: 208.112.209.3, 208.112.209.4, 208.112.209.5, 208.112.225.17, 208.112.225.18,

208.112.225.19

PROD Summary for MQ:

Prod advertised subnets: <u>208.112.144.0/24</u>, <u>208.112.145.0/24</u>, <u>208.112.160.0/24</u>,

208.112.161.0/24

PROD listeners: 208.112.144.6(1414), 208.112.160.6(1414)

PROD source IPs: 208.112.145.5, 208.112.145.6, 208.112.145.7, 208.112.161.5,

208.112.161.6, 208.112.161.7

Globex / Global Credit Control 2 (GC2)

CME Group is enhancing its internal credit controls to provide CME Clearing Members with realtime risk management tools to allow their customers to participate in Supplemental Trading Hour sessions.

A Q&A document addressing common questions related to credit controls is in Appendix B of this document.



"How-To" Sections

How to Obtain the Proper Clearing Membership to Clear Event Contract Swaps

Membership Requirements to clear Event-Based Swap Contracts: In order to clear event contract swaps, Clearing Members must adhere to the following membership requirements and onboarding process described below:

Firms not currently approved as a Base Clearing Member:

• Must go through the Clearing Member application process. Please contact <u>clearingmembership@cmegroup.com</u> for more information.

<u>Firms currently approved as a Base Clearing Member that is both a CME Clearing Member</u> and an OTC Clearing Member:

 No additional approval steps are required. Please see below regarding operational and reporting requirements.

<u>Firms currently approved as a Base Clearing Member that is a CME Clearing Member but not approved as an OTC Clearing Member:</u>

- 1. Firm must complete, and an Authorized Person of the firm must sign, CME Clearing's "Intention Form for Base OTC Derivative Clearing Membership".¹
 - Please note that the minimum Base Guaranty Fund requirement for OTC Clearing Members is \$2.5 million.

2. Due Diligence Call

CME Clearing will schedule a call with the firm to discuss operational set up and affirm
that the risk management program (e.g. policies, procedures and systems) currently
utilized by the firm to support their current CME clearing membership will be utilized to
support their OTC Derivatives activity; if the firm is intending to utilize a different risk
management program, CME Clearing will review the program as appropriate.

3. Governance

- CME Clearing's Credit & Liquidity Committee must approve an existing CME Clearing Member as an OTC Clearing Member. This approval will be brought to the Credit & Liquidity Committee after the firm demonstrates it is operationally ready to support OTC Derivatives activity, including:
 - o LSOC Compliant Reporting (see the "How to Set Up Accounts to be LSOC Compliant" section below)
 - Ability to send account numbers in CGM file for retail accounts
 - o Cleared swap bank accounts established at an approved CME Clearing Settlement Bank
 - o Ability to produce daily and monthly cleared swaps customer statements
 - o Connectivity to new queues for clearing confirm messaging

¹ See Intention Form for Base OTC Derivative Clearing Membership: <u>here</u>.



How to Obtain CME Approval for Supplemental Trading Hours

Membership Requirements to clear during Supplemental Trading Hours: Clearing Members will not be permitted to clear contracts on non-business days unless they are approved to do so by CME Clearing. CME Clearing's approval will be based on various factors, including, but not limited to, their ability to manage risk on non-business days (e.g., limit setting and risk controls). In accordance with CME Group Exchange Rule 982, "all clearing members must have written risk management policies and procedures in place to ensure they are able to perform certain basic risk and operational functions at all times (emphasis added). At a minimum, the following areas must be considered in the firm's policies and procedures, depending on the firm's size and its business and product mix.

982. Trade Submission and Account Monitoring. Clearing members must have procedures in place to demonstrate compliance in the following areas for trades executed through both electronic platforms and open outcry:

- 1. Monitoring the credit risks of accepting trades, including give-up trades, of specific customers.
- 2. Monitoring the risks associated with proprietary trading.
- 3. Limiting the impact of significant market moves through the use of tools such as stress testing or position limits.
- 4. Maintaining the ability to monitor account activity on an intraday basis, including overnight.
- 5. Ensuring order entry systems include the ability to set automated credit controls or position limits or requiring a firm employee to enter orders.
- 6. Defining sources of liquidity for increased settlement obligations.
- 7. Determining a risk profile for each account it carries, including whether such account presents a heightened risk profile."

In accordance with CME Group Exchange Rule 916 Base Clearing Members must have risk management policies and procedures in place as follows.

- 1. Base contracts that are not event contract swaps. In addition to its other obligations, a Base Clearing Member qualified to clear Base Contracts excluding Event Contract Swaps during Supplemental Trading Hours must have risk management policies and procedures designed to limit instances during Advance Funding Hours where its i)performance bond exposure in these base contracts exceeds its collateral and performance bond amounts posted to the Clearing House for the relevant account class; and ii) outstanding exposure in these base contracts exceeds its available sources of liquidity, as the Clearing House determines.
- 2. Base Contracts that are Event Contract Swaps. In addition to its other obligations a Base Clearing Member qualified to clear Base Contracts that are Event Contract Swaps during Supplemental Trading Hours must have risk management policies and procedures designed to limit instances during Advance Funding Hours where its exposure in these



Base Contracts exceeds its collateral and performance bond amounts posted to the Clearing House for the relevant account class.

Firms must adhere to the following requirements and onboarding process described below.

Firms currently approved as a Base Clearing Member:

1. Firm must complete, and an Authorized Person of the firm must sign, CME Clearing's "Supplemental Trading Hours Intention Form". The Firm must complete a Supplemental Trading Hour Due Diligence Risk Questionnaire and participate in a due diligence review.

2. Governance

- CME Clearing's Credit & Liquidity Committee must approve CME Clearing Members for Supplemental Trading Hours activity.
- This approval will be brought to the Credit & Liquidity Committee after the firm demonstrates it is ready to support Supplemental Trading Hours activity from an operational and risk management perspective.

How to Set Up Accounts to be LSOC Compliant

Event Contract Swaps:

- Base OTC Derivative Clearing Members must provide CME Clearing information sufficient
 to separately identify balances in customer accounts at least once per day. This
 requirement may be met through the following reporting options, which are determined by
 the net position capability (i.e., net long or net short) of their customers for event contract
 swaps:
 - Customers that will be restricted (as determined by the OTC Clearing Member) from holding a net short position in event contract swaps (e.g., likely to be retail customers)
 Option A:
 - Fully-disclosed (e.g., anonymized alphanumeric codes) LSOC accounts are permitted for customers that will be restricted from holding a net short position in event contract swaps.
 - OTC Clearing Members must have a process to prohibit these customers from entering a net short position (e.g., pre-trade controls).
 - OTC Clearing Members must provide CME Clearing a Customer Gross Margin ("CGM") file at least once per business day. This file may be separate from any CGM files provided for the firm's nonevent contract swap activity. The CGM file must break out individual customer accounts and the accounts need to be identified on an ongoing basis by name, numeric and/or alphanumeric codes.

Option B:

- OTC Clearing Members must register each customer account separately in Account Manager and select an individual PBA.
- These accounts are not subject to daily CGM reporting.



- OTC Clearing Members will choose a "Protection Regime" at the Settlement Account ("SA") level. There may be multiple Performance Bond Accounts ("PBA") under a single SA and all PBAs must be on the same Protection Regime.
 - LSOCU (i.e., without excess) client collateral value = client Initial Margin ("IM") requirement.
 - LSOCC (i.e., with excess) client collateral value >= client IM requirement.
 - Reporting Option 1: OTC Clearing Members can submit a Collateral Value Report ("CVR") multiple times a day to update collateral values for customer accounts and/or FCV. This is a FIXML file submitted via the OTC Clearing Member's SFTP directory.
 - Reporting Option 2: OTC Clearing Members can email <u>LSOC@cmegroup.com</u> to have CME Clearing update PBA values and/or FCV.
- PBA values can only be updated if the firm operates in LSOCC. FCV can be updated in either LSOCC or LSOCU.
- If OTC Clearing Members do not submit CVR or contact CME Clearing under Reporting Option 2, CME Clearing will assume client collateral value = client IM requirement after each cycle.
- CME Clearing cannot assume any value for FCV, thus, OTC Clearing Members must explicitly provide this value via CVR or email.
- Customers that will be permitted (as determined by the OTC Clearing Member) to hold a net short position in event contract swaps (e.g., market markers)
 - OTC Clearing Members must register each customer account separately in <u>Account Manager</u> and select an individual PBA.
 - These accounts are not subject to daily CGM reporting.
 - OTC Clearing Members will choose a "Protection Regime" at the SA level. There may be multiple PBAs under a single SA and all PBAs must be on the same Protection Regime.
 - LSOCU (i.e., without excess) client collateral value = client IM requirement.
 - LSOCC (i.e., with excess) client collateral value >= client IM requirement.
 - Reporting Option 1: OTC Clearing Members can submit a CVR multiple times a day to update collateral values for customer accounts and/or FCV. This is a FIXML file submitted via the OTC Clearing Member's SFTP directory.
 - Reporting Option 2: OTC Clearing Members can email <u>LSOC@cmegroup.com</u> to have CME Clearing update PBA values and/or FCV.
 - PBA values can only be updated if the firm operates in LSOCC. FCV can be updated in either LSOCC or LSOCU.



- If OTC Clearing Members do not submit CVR or contact CME Clearing under Reporting Option 2, CME Clearing will assume client collateral value = client IM requirement after each cycle.
- CME Clearing cannot assume any value for FCV, thus, OTC Clearing Members must explicitly provide this value via CVR or email.



Appendix

Appendix A: CME Group Economic Indicator Event Contract Swap Details

- Initial Listings may include: Federal Open Market Committee (FOMC) target rate range, Consumer Price Index (CPI), Gross Domestic Product (GDP), Non-Farm Payroll (NFP), Unemployment Rate, Personal Consumption Expenditures Price Index (PCE), Bitcoin, and Ether Real-Time Indices
- **General Specs:** Binary Option with a \$0 or \$1 Payout;
 - \$0.01 Min. Tick; European-Style Options
 - Positions are full value margined (Full maximum loss is posted by buyer/seller example below)
- <u>Swap Categorization</u> These instruments will be categorized as swaps under the CFTC definition.

FOMC Event Contract

"Will the lower bound of the Federal Funds target rate range meet or exceed [Strike] following the conclusion of the [Full Meeting Date] FOMC Meeting?"

100 = 5ettiernent of 50 . Long Call is 0.1 M. Yes $= 5$ ettiernent of 5.1 . Long Call is 1.1	Settlement of \$0; Long Call is OTM; Yes = Settlement of	\$1: Lona Call is I	TM
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	Rate		
Strike	4.00-4.25	4.25-4.50	4.50-4.75
5.00	No	No	No
4.75	No	No	No
4.50	No	No	Yes
4.25	No	Yes	Yes
4.00	Yes	Yes	Yes
3.75	Yes	Yes	Yes
3.50	Yes	Yes	Yes
3.25	Yes	Yes	Yes
3.00	Yes	Yes	Yes
2.75	Yes	Yes	Yes

Example: If the Fed cuts rates by 25 bps at the Sep. 17th meeting such that the Federal Funds target range lower bound becomes 4.00, all strikes above 4.00 will resolve to "No" and Settle to \$0; whereas all strikes at or below 4.00 will resolve to "Yes" and Settle to \$1.

Full Value Margin - How does it Work?

For example, assume a trade occurs at a level of \$0.40. A buyer will pay \$0.40, covering their max possible loss of \$0.40, with \$0.60 as the max possible gain.

The seller concurrently receives \$0.40 (their max possible gain) from the sale while also posting \$1 in margin to cover the potential for the contract to expire at \$1, a net outlay of \$0.60 for the seller at the time of the trade. This treatment covers the seller's max loss as well (\$0.60).



Appendix B: GC2 Limits and ICC Limit Q&A Doc

The below provides answers to common questions about the systems, processes, and credit policies for the initial launch of event contract swaps and Supplemental Trading Hours.

Q: What are the main credit enforcement policies for 24/7 trading?

A: GC2 (Global Credit Control) will be enforced for all accounts. An FCM can also use Product Restriction Policies (PRP) to selectively block certain products from trading at the execution firm level.

Q: How will FCMs disable trading over the weekend?

A: For the initial launch, an FCM will use a new "Disable Weekend Trading" flag in Risk Management Tools (RMT) to manage whether an execution firm can trade over the weekend. This flag defaults to "On", thus, disabling weekend trading and remains "On" unless the FCM disables it. This is a persistent setting and once the setting is toggled it gets carried forward week to week until the setting is changed.

To enable trading over the weekend, the FCM will need to set the "**Disable Weekend Trading**" flag to "Off" for a specific execution firm. Once the flag is "Off", at the start of each weekend session, the system will automatically enable the execution firm for weekend trading, with existing week day limits.

LIMITATION: This flag can only be turned "On" or "Off" during the week days (Monday-Friday), prior to the start of the weekend session. The flag cannot be toggled during the weekend session to enable or disable an execution firm.

Q: Can an FCM block trading in Event Contract Swaps?

A: Yes. An FCM can use Product Restriction Policies (PRP) to selectively block certain products from trading at the execution firm level. Help Link: https://www.cmegroup.com/tools-information/webhelp/entity-risk-management/Content/globex-product-restriction-policy.html

LIMITATION: This must be set or changed during the week (Monday-Friday) prior to the start of the weekend session. PRP cannot be changed during the weekend session. Limits must be set individually for each product.

Q: Can an FCM edit credit limits during the weekend session?

A: No. The user interfaces (UIs) for limit management will not be available for the initial launch, and thus, limits will not be editable during the weekend. UI access to enable limit editing during the weekend is planned for implementation in early 2026.

Q: How can FCMs monitor credit utilization during the weekend?



A: Utilization can only be viewed internally by the GCC (Global Command Center) team. UI access to reports is planned for implementation in early 2026.

Q: How will FCMs be notified about utilization thresholds?

A: Utilization threshold alerts will be sent via email based on the configured thresholds set by the FCM. The Clearing House and GCC will continue to receive these alerts as usual.

Q: What are the new default ICC values for Event Contract Swaps?

A: The default values have been updated.

- iccMinimumCalculatedMarginRate is now set to \$1 (previously \$20).
- iccMarginRateDefaultValue is now set to \$1 (previously \$100).

Systems & Platform Availability

Q: Which user interfaces (UIs) will be available?

A:

- AMS UI: Will not be available.
- **RMT**: Will be accessible, but all data is **test data only** and should **not** be relied upon.
- FEC+: UI will be accessible
- UI access is planned for implementation in early 2026.

Q: How are risk controls like Kill Switch and Block/Unblock managed for the new Event Contract Swaps?

A: Standard risk management features such as the Kill Switch, Block/Unblocks, and Access Manager features (any restrictions implemented via RIA) are not available for the new event contract swaps. This limitation applies to all trading sessions, including both weekdays and weekends.

To cancel orders or manage port access for these specific contracts, customers must contact GCC to have the action performed. To block a firm's access during a weekend session, a Firm Administrator must contact the GCC. UI access to kill switch is planned for implementation in early 2026.

Q: Will Firmsoft be available over the weekend?

A: Yes, Firmsoft will be accessible from the following link: https://firmsoftweekend.prod.cmegroup.com

Q: Are new entitlements required for Firmsoft weekend access?



A: Yes, new entitlements are needed app PROD- "Firmsoft Weekend PROD 7d"

Q: Is ClearPort available for 24/7 trading (Event Contract Swaps)?

A: No, ClearPort is out of scope for the initial launch.

Q: Can new accounts be created over the weekend?

A: No, account creation is not supported during the weekend session. Additionally, the simplified account creation API will not be available. Support for account creation is planned for implementation in early 2026.

Trading & Operations

Q: How is the weekend trading period structured?

A: The entire weekend is considered a single trading session. This means there will be no Endof-Day (EOD) trade reset on Saturday or Sunday.

Q: When will weekend trades and orders be reflected in utilization?

A: Utilization from all orders and trades from the weekend session will be measured in real time versus limits during the weekend session. Weekend utilization will be carried forward into the next business day.

Q: Will max position reporting be available?

A: No, max position reporting is out of scope for the initial launch.

Q: What is the policy for PRP configurations on weekends?

A: Any existing Product Restriction Policy (PRP) configurations will remain effective during the weekend.

Q: Are intra-day PRP updates supported during the weekend?

A: No. At this time, intra-day updates to the PRP during the weekend are out of scope. This functionality may be revisited once Account Manager support is available.

Q: How do Good 'Til (GT) orders from the week affect weekend risk calculations?

A: Non-event contract swaps GT orders from the prior week will not be applied to a firm's overall GC2 exposure for the weekend session. This exposure will only be calculated and applied on Sunday before the session opens.



Appendix C: Other Resources

SER: Initial Listing of Economic and Bitcoin & Ether Event Contracts

SER: <u>Initial Listing of Hourly Event Contracts on Certain CME Group Futures</u> Contracts

SER: <u>Amendments to the Contract Size and Minimum Price Increments of the CME, CBOT, NYMEX, and COMEX Event Contracts on Futures</u>

CHAN: Event Contracts on Economic Indicators

CHAN: Event Contracts on Bitcoin and Ether

CHAN: Event Contract Product Modifications

CHAN: Hourly Event Contracts on Futures

CHAN: Classification of Cash Flows for CME Event Contracts