

# International Incentive Program Application Form

International Incentive Program ("IIP")

APRIL 2025

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**Chicago Mercantile Exchange Inc. ("CME")**

**Board of Trade of the City of Chicago, Inc. ("CBOT")**

**New York Mercantile Exchange, Inc. ("NYMEX")**

**Commodity Exchange, Inc. ("COMEX")**

**Note to Applicant:** This PDF works best when completed using the application [Adobe Reader](#). Alternative PDF viewer software may not support fillable form fields.

## Section 1

### Information Summary

Thank you for your interest in CME Group Inc. ("**CME Group**")'s International Incentive Program ("**IIP**"). CME Group maintains the IIP to enable approved applicants that ("**IIP Participants**") are Proprietary Trading Firms located and incorporated outside of North America to receive discounted fees ("**IIP Fees**") for trading in Program Products. These incentives apply only to IIP Participants trading in certain CME, CBOT, NYMEX, and COMEX products ("**Program Products**") that are made by Qualified IIP Traders located outside of North America in accordance with applicable rules and regulations of the Exchanges including, but not limited to, Exchange Rule 195, the International Incentive Program Terms and Policy Document, and Exchange policies located on CME Group Inc.'s website at [www.cmegroup.com](http://www.cmegroup.com) including all amendments thereto. For more information and a list of complete requirements, please review the applicable IIP Questions and Answers Guides at <https://www.cmegroup.com/FAQ>.

Capitalized Terms used but not defined in this Application Form are defined in the International Incentive Program Terms and Policy Document. This Application Form should be read in conjunction with the International Incentive Program Terms and Policy Document, but in the event of any inconsistency between this Application Form and the International Incentive Program Terms and Policy Document, the International Incentive Program Terms and Policy Document prevails.

Please review and follow all directions contained in this application packet carefully. Please note incomplete information will extend the application review process. Prior to submitting the application, each applicant should ensure the following:

**1. Ensure ALL questions on the application have been thoroughly reviewed and completely answered.**

**2. ALL supporting documents listed in Section 5 of the application are submitted**

**3. Ensure the following forms are executed by authorized persons of the applicant:**

- Attestation, Authorization, and Agreement Form;
- CME Group Inc. Firm Trading Attestation Form; and
- Designated Spokesperson and Authorized Person Acknowledgment Form.

**4. Application Fees:**

- For IIP applicants, a non-refundable application fee of \$2,000 is required.
- For wire transfer instructions, please contact [conciergeteam@cmegroup.com](mailto:conciergeteam@cmegroup.com).

**5. Ensure a scanned copy of the application and all applicable supporting documentation is emailed to [conciergeteam@cmegroup.com](mailto:conciergeteam@cmegroup.com).\***

If you have questions or have submitted an application and have not received a confirmation email within three business days of submission, please contact our Concierge Team at +1 312 435 3555 or [conciergeteam@cmegroup.com](mailto:conciergeteam@cmegroup.com).

*\*Please note CME Group's incoming email attachment limit is 10 MB (10240 KB). As such, if the sum total of email attachments is greater than 10 MB, please send multiple emails attaching the required documents.*

## Section 2

### What to Expect - Application Flow

#### **Application received by Concierge Team**

Applicant will be assigned liaison from Concierge Team  
Review for completeness of Initial Required Documentation

Upon completion, applicant will receive e-mail indicating transfer of application for Committee Review



#### **Application will be Reviewed by Review Committee**

Upon Approval, applicant will receive e-mail indicating program approval



#### **Application returned to Concierge Team Liaison**

Applicant will confirm desired program participation start date  
(For incentive programs with volume requirement as applicable)

#### **Firm approved for Application Incentive Program Participation Status**

Applicant will receive e-mail indicating effective date of Incentive Program participation

Full Legal Name

Section 3

Applicant's details

1. About the applicant

Full Legal Name			Date Established		
Tax Identification Number			LEI (Legal Entity Identifier)		
			Country of Incorporation		
Main Address			Main Address Line Two		
City			Country/State/Province		
			Zip/Postal Code		
Phone Number			Website Address		
Local Address			Local Address Line Two		
City			Country/State/Province		
			Zip/Postal Code		

2. Type of organization:

- Corporation
- Limited Liability Company
- Limited Partnership
- General Partnership
- Other (please specify)

## Section 4

### General Questions

#### 1. Please respond to the below questions with respect to the following:

- The applicant firm itself;
- Each entity that has a direct or indirect ownership interest in the applicant firm;
- Each individual owner of the applicant firm (including individual owners of entities with a direct or indirect ownership interest in the applicant firm);
- Each individual listed as a Designated Spokesperson or Authorized Person in Section 8; and,
- Each trader of the applicant firm (Owners, Employees and Independent Contractors, as applicable)

Question	Yes	No
A. Have any of the above ever been denied registration, or had a registration suspended, revoked, or conditioned by a governmental or regulatory authority?		
B. Have any of the above ever been denied membership or clearing privileges by any commodity or securities exchange/clearing organization?		
C. Has any authority (e.g., criminal, federal administrative or regulatory or self-regulatory organization) penalized or sanctioned any of the above where findings were based on conduct, in whole or part, that: (a) Involved activity in a market maker or incentive program; (b) Required the payment of customer restitution; (c) Involved fraud or dishonest conduct; (d) Involved an act detrimental to the welfare or the interest of the exchange; (e) Involved market manipulation; or (f) Involved disruptive trading practices, including activity that is or is of the character of spoofing?		
D. Have any of the above ever been convicted, pleaded guilty, entered a plea of "no contest" or entered into a voluntary settlement or is currently the subject of a regulatory or legal proceeding or investigation for any felony or misdemeanor involving, arising from, or related to the purchase or sale of any commodity, security, futures contract, option or other financial instrument or involving, arising from, or related to fraud or moral turpitude?		
E. Are any of the above currently the subject of a regulatory or legal proceeding or investigation where the allegations, in whole or part, involve: (a) Activity in a market maker or incentive program; (b) Violations of duties owed to customers; (c) Fraud or dishonest conduct; (d) An act detrimental to the welfare or interest of the exchange; (e) Market manipulation; or (f) Disruptive trading practices, including activity that is or is of the character of spoofing?		

If your response is yes to any of the above, please describe below and provide supporting documentation.

## Section 4

### General Questions *(continued)*

2. Does the applicant engage in futures and options customer business? If so, please describe.  
  
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3. Is the applicant subject to any restrictions which would prohibit it from becoming an IIP participant?
4. Is the applicant registered in any capacity with a regulatory agency? If so, indicate the nature and country of the registration(s), the applicant's primary regulator(s) and the regulator's website(s).
5. List all commodity or security exchanges or clearing organizations at which membership or incentive program privileges are held or pending by the applicant. Please indicate the type of incentive program or membership held (e.g. clearing or non-clearing).
6. List all CME, CBOT, NYMEX and/or COMEX membership or CME Group Inc. incentive programs (including market maker incentive programs) held or pending by applicant. If applicable, please indicate the type of membership held (e.g. clearing or non-clearing).

Section 4

General Questions *(continued)*

7. Describe the nature of the applicant's anticipated firm trading activity:
- a. Please list CME, CBOT, NYMEX and/or COMEX products that the applicant intends to trade:

8. Indicate the CME, CBOT, NYMEX and/or COMEX clearing member(s) that will clear the applicant's trades and the Designated Proprietary Trading Account number(s).

FIRM NAME	ACCOUNT NUMBER

## Section 5

### Supporting Documents

*Please confirm that you have attached the following supporting documents to this application.*

#### A. General supporting documents for ALL applicants

Yes

No

- |    |  |  |  |
|----|--|--|--|
| 1. | Most current (including all amendments) Company Organizational Documents (e.g., Certificate of Incorporation) and Shareholders Registries as applicable.   |  |  |
| 2. | A copy of a recent day's trading account statement for all accounts at each of the applicant's CME, CBOT, NYMEX and/or COMEX clearing member(s) indicating that the firm's account is opened, funded and properly titled in the name of the incentive program applicant. |  |  |
| 3. | A completed CME Group Trader Listing found in Section 6 of this application.   |  |  |
| 4. | Signed Trading Firm Attestation.   |  |  |

**CME Group will not process the application unless all supporting documents have been provided. Please note that all supporting documents must be submitted in English, however, these do not have to be "official" translations.**

If the response is 'No' to any of the above questions, please further describe below why supporting document(s) were not attached:





## Section 6

## CME Group Trader Listing

Please complete the following CME Group Trader Listing for all Qualified IIP Traders that will be trading CME Group Program Products for the IIP Applicant. In addition, if the firm maintains a large number of traders, the firm may elect to attach a separate CME Group Trader Listing, which includes all of the required trader information noted below.

**Check the box if the answer is "Yes" to the columns below.**

[illegible]

## Section 7

### Attestation, Authorization and Agreement for Program Participation

By signing below, Applicant hereby submits this Application for participation in the IIP and acknowledges and agrees to the following:

1. If applicant is accepted as an IIP Participant, it will comply with and agrees to be bound by and subject to the bylaws, certificate of incorporation, and applicable rules and regulations of the Exchanges including, but not limited to, Exchange Rule 195.
2. Applicant represents and warrants that the information concerning applicant, its principals and all other information set forth in its application to become an IIP Participant (the **"information"**) is true, correct and complete as of the date set forth below and further acknowledges that submitting incorrect, incomplete or false Information may subject applicant to the Exchanges' disciplinary action, penalties and/or termination of IIP participation.
3. Applicant agrees to notify CME Group Inc. in writing of any material changes with respect to the Information that takes place after submission of its Application for the IIP and, if accepted into the IIP, for the duration of applicant's participation in the IIP.
4. The IIP and its terms are subject to all applicable regulatory processes and certification with the CFTC, and the completion of such processes and receipt of such approvals, are conditions precedent to the effectiveness of this application. The Exchanges shall have the right, in their sole discretion, but not the obligation, to monitor applicant's trading in the Program Products to ensure compliance with the terms of the IIP and this application. The Exchanges reserve the right to disqualify any trade that they deem inappropriate to include in the IIP from the rights and obligations of this application.
5. The Exchanges shall not have any liability to applicant or any third party with respect to its administration of the IIP, and the exclusive remedy of applicant for any claim under the IIP will be termination of this application and applicant's participation in the IIP. The Exchanges and its partners, directors, officers, employees, shareholders and agents shall not be liable to applicant or to any third party for any damages, whether actual, direct, indirect, incidental, special or consequential, of any type whatsoever, arising out of or relating in any manner to the administration of the IIP, this application, the termination of this application or the termination of the applicant's participation in IIP. For the avoidance of doubt, the liability of the Exchanges for any event not related to the administration of the IIP shall be limited by Rule 578 and any related dispute shall be subject to the arbitration requirements of Rule 578.
6. All personal information provided under this Application will be used, distributed, and maintained in accordance with [CME Group's Privacy Policy](#). If completing this Application on behalf of another individual, you will ensure that you have the required consent from the individual to whom the personal information relates, or you satisfy an applicable legal basis for doing so, in compliance with all applicable laws, to enable CME Group to process such personal information.
7. Applicant acknowledges and agrees that the Exchanges may modify or terminate the program, and any associated requirements and/or incentives thereunder, in the Exchanges' sole discretion for any reason whatsoever and at any time upon notice to applicant.
8. Applicant must ensure that their request for Program Participant status is lawfully made in accordance with the laws of the jurisdiction in which they are located. Should such a request be made unlawfully, the Exchanges shall have the right to terminate said Program Participant status.

**Acknowledged and agreed by a duly authorized representative (i.e. Authorized Officer, Managing Member, Partner or Director) of:**

Signature

Title

Print Name

Date

Firm Name

**Section 8**

**Designated Spokesperson and Authorized Person Form**

CME Group Inc. Exchanges require Applicants/IIP Participants firms to designate a Designated Spokesperson(s) and Authorized Person(s) who shall be authorized to deal with the Exchanges with respect to its participation in IIP and who shall be authorized to represent the firm before the Exchanges. Such authorized representatives shall be responsible to the Exchanges as if such person was a member as defined by Rule 400.

CME Group may only discuss the application and information provided pursuant thereto with those individuals designated by the firm as a Designated Spokesperson and/or an Authorized Person. Please provide a complete listing of the firm's Designated Spokesperson(s) and Authorized Person(s) below. Changes to the list of Designated Spokesperson(s) or Authorized Person(s) may only be made in writing by contacting CME Group's Concierge Team at [conciergeteam@cmegroup.com](mailto:conciergeteam@cmegroup.com). CME Group collects and uses personal information for the purposes for which it was obtained. For further information please reference CME Group's Privacy Policy or contact the Privacy Office at [privacy@cmegroup.com](mailto:privacy@cmegroup.com).

Name	Job Title	Phone Number	Email Address	Authorized Person <sup>1</sup>	Designated Spokesperson <sup>2</sup>

Firm Name

Section 8

Designated Spokesperson and Authorized Person Form (continued)

Name	Job Title	Phone Number	Email Address	Authorized Person <sup>1</sup>	Designated Spokesperson <sup>2</sup>

1 An Authorized Person shall be defined as an authorized representative who shall have the authority to make membership and/or incentive program related decisions on behalf of the firm including, but not limited to, applying, changing, or withdrawing membership and/or incentive program status, request to deposit or withdraw required seats and/or shares and the buying, selling, releasing or transferring of seats and shares. In addition, an Authorized Person shall have the same authority as the Designated Spokesperson noted below.

2 A Designated Spokesperson(s) shall be defined as an authorized representative whereby CME Group, at its sole discretion, may provide or discuss any membership and/or incentive program related information specific to the firm.

I attest that the information provided above is accurate and complete. This form shall supersede any previously submitted Designated Spokesperson and Authorized Person Form.

Signed: (on behalf of the applicant\*) Position

Name (printed) Date

\*Authorized Officer, Managing Member of an LLC or Partner. All signors within this application form should also be designated as an Authorized Person above.

## Section 8

CME Group Inc. policies require all its directors, officers, employees, consultants, and agents ("Representatives") to treat as confidential and to use a reasonable degree of care to maintain the confidential nature of all information received from an Applicant in conjunction with an Application for Program participant status on a CME Group Exchange (i.e., CME, CBOT, NYMEX, and COMEX). Such confidential information may only be disclosed to CME Group representatives who have a need to know such information and who are bound by these policies and who agree to protect the confidential information from unauthorized use and disclosure. CME Group collects and uses personal information for the purposes for which it was obtained. All personal information provided under this Application will be used, distributed, and maintained in accordance with CME Group's Privacy Policy. If completing this Application on behalf of another individual, you will ensure that you have the required consent from the individual to whom the personal information relates, or you satisfy an applicable legal basis for doing so, in compliance with all applicable laws, to enable CME Group Inc. to process such personal information. For further information, please reference CME Group's Privacy Policy or contact the Privacy Group at [privacy@cmegroup.com](mailto:privacy@cmegroup.com).

Due to the confidential and proprietary nature of the Program, Applicant and its affiliates or related entities will treat the Program Terms and Conditions including, but not limited to, the Program incentives, and all material correspondence or other information exchanged between the Applicant and the Exchange in connection with this application and the development of the arrangement between them ("Confidential Information") as confidential. The Applicant shall not disclose the Confidential Information other than in accordance with this application and shall use the same degree of care used to protect its own confidential or proprietary information of like importance, but in any case, using no less than a reasonable degree of care. Applicant may allow access to Confidential Information received hereunder to it and its affiliates and their respective directors, officers, employees, futures clearing merchants or other entities clearing Applicant's and its affiliate's trades who have a need to know, for the purpose of this Program, and who are directed to protect the received confidential information from unauthorized use and disclosure. Notwithstanding the foregoing, each party may disclose confidential information received by it to the extent required by a valid subpoena or other order of court, law, or other regulation, or to the extent required or requested by any governmental or regulatory authority with jurisdiction, provided that, in any such case, the receiving party shall use reasonable efforts to secure confidential treatment of the information so disclosed.